From:

•: Aquind Interconnector

Subject: FW: Adequacy of consultation request Date: 28 November 2019 17:03:58

Attachments:



I have noted an error in the heading on the previous response letter sent earlier today. I now send a corrected version with all the appendices. Please delete the earlier email and attachment taking those above as a replacement.

Thank you Steve Cornwell Winchester City Council.

From: Stephen Cornwell Sent: 28 November 2019 15:04

To: 'aquind@planninginspectorate.gov.uk' **Subject:** Adequacy of consultation request

Your reference EN020022

Planning Act 2008 (as amended) – Section 55
Application by Aquind Limited for an Order Granting Development Consent for the Aquind Interconnector

Please find attached the response from Winchester City Council regarding the Adequacy of consultation request as set out in your letter of 15 November 2019.

Regards

Steve Cornwell

Winchester City Council

This email and any files transmitted with it are intended solely for the addressed individual. The information in this email may be confidential; if you have received it in error, please accept our apologies and notify the sender as soon as possible, and delete it from your system without distributing or copying any information contained within it. Under UK Data Protection and Freedom of Information legislation, the contents of this email might have to be disclosed in response to a request. We check emails and attachments for viruses before they are sent, but you are advised to carry out your own virus checks. Winchester City Council cannot accept any responsibility for loss or damage caused by viruses.





City Offices Colebrook Street Winchester Hampshire SO23 9LJ

Mr Robert Ranger Case Manager National Infrastructure Planning Temple Quarry House 2 The Square Bristol BS1 6PN

Your Ref: EN020022

Our ref:

Contact: Mr Stephen Cornwell

Direct Line:

Email:

Sent by email only

Please quote 18/02021/NSIP on all correspondence

28 November 2019

Dear Sir

Planning Act 2008 (as amended) Section 55

Application by Aquind Limited for an Order Granting Development Consent for the Aquind Interconnector

Subject: Adequacy of Consultation Request

I acknowledge receipt of your letter dated 15 November 2019 which indicates that the above application has been submitted and that you are seeking confirmation that the applicant has complied with the following sections of the Planning Act (as amended):

Duty to consult – section 42 Duty to consult the local community – section 47 Duty to publicise–section 48

Winchester City Council (WCC) is one of the 5 host authorities associated with this project. The South Downs National Park boundary lies in close proximity to the northern end of the site and as such, is also registered as a neighbouring authority.

The proposal relates to a linear project which extends from Eastney which represents the landfall point for the cables up to Lovedean near Denmead. The proposal is to bury the cables in the highway up through Portsea island, and up the A3 to Waterlooville. From there, the cable route will follow the Hambledon Road (B2150) before striking off across the countryside up to Lovedean where the

Julie Pinnock Service Lead Built Environment

Interconnector Station will be located. This will facilitate the connection to the national grid via the adjacent Lovedean sub station. The elements of the scheme that fall within the administrative area of WCC are sections of the cable route (road and cross country) and the Interconnector Station. The following comments are focused on the exercise of the consultation duties with regard to these elements of the scheme that lies in the WCC area.

I have reviewed the submitted documents and specifically the Consultation Report that has been submitted with multiple appendices. The disjointed nature of some of the appendices (1.4C) has not made any useful assessment easy.

Duty to Consult- Section 42

Aquind first approached Winchester City Council in March 2018. Since that date, there have been multiple contacts by email, tele conferences and face to face meetings. The meetings have covered a range of issues and included both one to one meetings between Aquind and WCC and joint meetings attended by more than one authority. Attendance at one to one meetings have included both officers and more recently elected members. Through these opportunities, the views of the district council have been offered and points of clarification obtained.

Whilst it is true to say there are differences of view between the council and Aquind on matters relating to this scheme, dialogue has been extensive. On that basis, Winchester City Council has no concerns in relation to the duty to consult as set out in Section 42 of the Planning Act 2008

Duty to consult local community – Section 47

It is noted that clear guidance on how an authority should measure the "adequacy" of a consultation exercise is absent from the legislation and the guidance notes. It is therefore appropriate to outline the approach the council has taken in reaching the view which are set out below.

At a basic level, community engagement needs to relate to people who live, work and use the area for leisure and recreation. Whilst acknowledging that a scheme is evolving before submission, there also need to be an adequate level of detail so that people can obtain a sufficient understanding of the proposal. However, beyond this basic statement, there is a need to consider what type of development is being put forward and whether the nature of a scheme calls for a more thoughtful approach. In this instance, the project relates to sections of underground cabling and the construction of a very large building in an open countryside location. The cable laying will impact on road users over the installation period, whilst the building will be a continuous presence in the area. These factors need to influence the audience that any consultation is directed towards.

There is a need to recognise that the application extends across an area that is not uniform in nature. The southern part is a dense urban area whilst the Winchester section is open countryside with scattered properties and one main settlement at Denmead (population approximately 6,700). This difference is also reflected in the presence of facilities such as public libraries where materials relating to a project may be publicised. Consequently, what may be an appropriate consultation method in one location may not work elsewhere. The "one size fits all "approach can be true within a scheme just as much as it applies between different schemes. Where traditional venues such as libraries do not exist, it will be necessary to "thinking outside the box" about suitable and even unconventional venues and how to reach out to the community and hard to reach groups.

Winchester City Council was consulted on the draft Statement of Community Consultation (SoCC) in late 2018. A response was sent back in return. In January 2019, the local planning authority obtained sight of the plan showing the Zone of Theoretical Visibility (ZTV). A copy of this plan dated 17 December 2018 is attached as appendix A to this letter. This presented a greater potential impact of the scheme over a wider area than originally envisaged. Consequently, further emails where sent to Aquind expressing a view that the scale of the public consultation should be extended to reflect the greater degree of impact. As part of these comments views where expressed about what was seen to be the limited opportunities to alert people to the proposal. I attach as appendix B a copy of the emails sent.

One element of concern related to the lack of opportunities for local people from the Denmead/Hambledon areas to be made aware of the proposal and then to view hard copies of the details. The nearest location to view the actual documents was Waterlooville library. This is 3.3 miles away. I attach as appendix C a copy of a plan dated February 2019, showing the red lined boundary with the venues for public exhibitions shown in green and static deposit locations where the documents could be viewed shown in blue. The concern was the lack of a location serving Denmead and Hambledon. The extent to which both Denmead and Hambledon village centres as used to accommodate multiple events for local people was noted and both of these locations where proposed to Aguind as document locations over the consultation period. The high footfall of visitors to the centres was viewed as an ideal opportunity to reach out to residents of the area Instead of placing material in the centre. Aguind appears to have sent the organisers of these diverse groups individual consultation leaflets. It is noted that the copy attached as appendix 1.4H does not explain to that recipient how they are being asked to disseminate the information about the project. A more specific targeted letter was required for this contact to prove useful. Whilst Aquind did include some of the groups suggested by WCC in its consultation, the attempt outlined above cannot be viewed as

anything other than a failure. Consequently, the effectiveness of the consultation of non statutory groups/individuals is questioned.

It is acknowledged that a 4 hour public exhibition was held in Denmead on Friday 5 April 2019. Unfortunately, there are no figures available for the level of public involvement at that event. Aquind have presented figures that show a total of 709 people attended all of the nine events and that a total of 155 people returned comments on the scheme. As these figures are aggregated from all the venues, they offer no indication of the success of each location. The information from Aquind appears to show approximately 20 respondents live in the Denmead area. This seems a low figure for such a significant proposal. With the higher population, there is a concern that more people may have attended the venues in the Portsmouth area.

The potential exists for significant delays resulting from the cable laying. However, the degree of engagement directly targeted towards the business community around Denmead and Hambledon who will be impacted by this work is unclear. The suggestion of contacting the Denmead Business Club does not seem to have been acted upon as the name could not be found in appendix 1.4F.

It is also unclear if the Newsland Parish Council which was established on 1 April 2019 and hosts a small section of the cable route near Waterlooville was notified. Prior to 1 April they existed as a shadow authority. They do not appear in Appendix 1.4B. I attach as appendix D a copy of a plan showing the Newlands PC area which includes the roundabout at the B2150/A3 junction and then a further section of the Hambledon Road.

One indicator that there may have been a lack of engagement with the local community are the 28 August 2019 Denmead Parish Council Planning Committee minutes. They record a concern that local people do not know about the proposal. Minute 164/20P. A copy of the minutes is attached as appendix E

The restriction to consider only the merits of the consultation exercise in this letter is noted. However, the following is raised as it does go to the heart of consultation. Specifically, whether the information placed in front of the public was clear and reliable. In the response to the PEIRR, the WCC letter dated 29 April 2019 noted that the applicant had potentially confused the public by using different methods to set out the timetable for the installation of the cable on the Hambledon Road. The figures presented in the consultation document needed to be doubled to give a true level of the delay that would be experienced. It was unclear if this true figure was understood by any member of the public and whether they might have responded differently if the full implications where known. I attach as appendix F a copy of that letter.

At present time there are unanswered questions on how appropriate and adequate the consultation exercise has been.

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Duty to publicise – Section 48

Winchester City Council has no comment to make on the applicants compliance with Section 48 of the Planning Act 2008.

Conclusion

Overall, Winchester City Council considers that the applicant has complied with its duties under Sections 42, & 48 of the Planning Act 2008 (as amended). Regarding Section 47, the council has concerns over the extent of the engagement with the local community which it feels could have been more inclusive.

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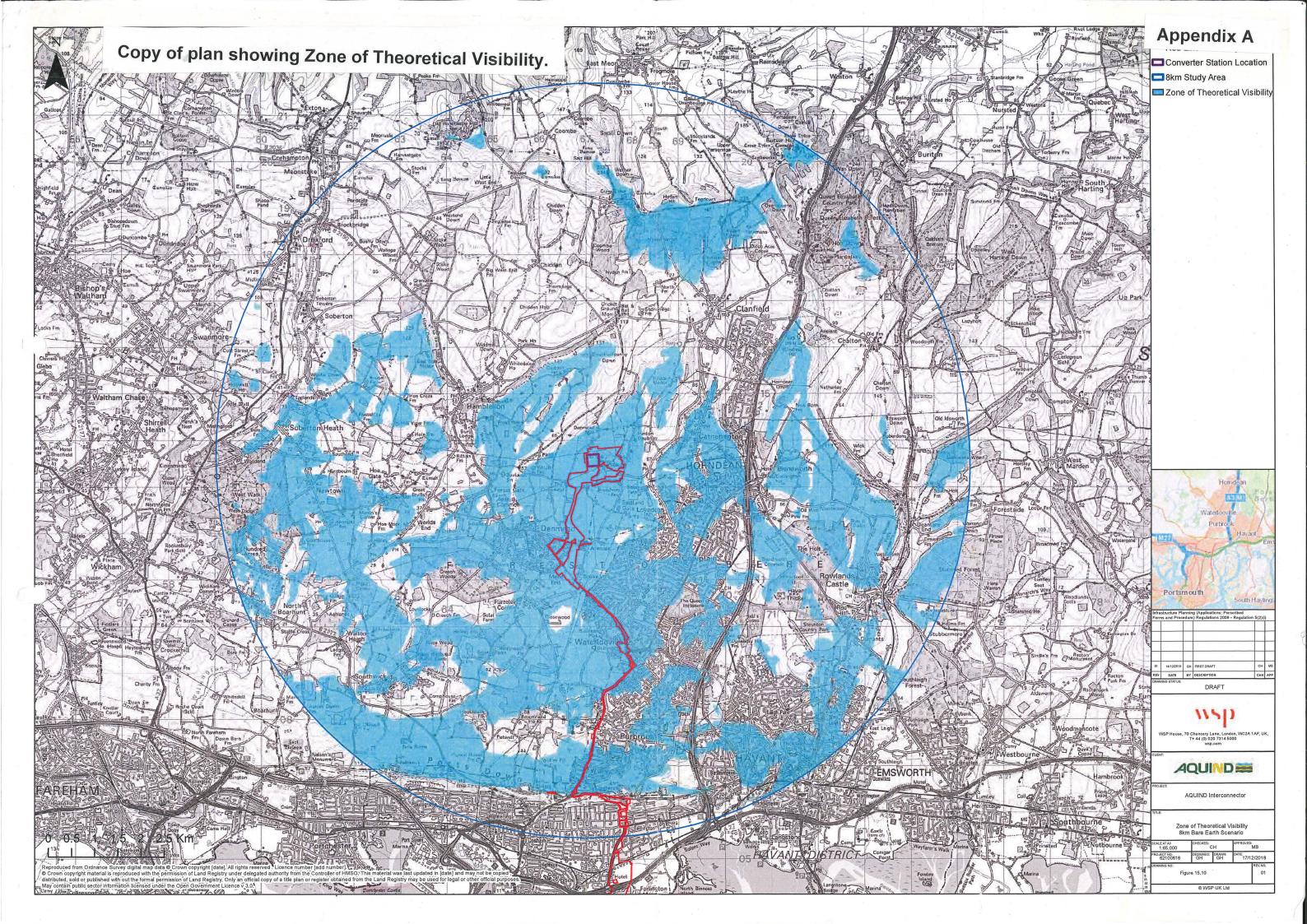
If you have any queries or require further information, please do not hesitate to contact the Case Officer, Mr Stephen Cornwell on 01962 848 485.

Yours faithfully

Yours sincerely,

Julie Pinnock BA (Hons) MTP MRTPI Service Lead - Built Environment

Appendices attached



WCC emails to Aquind.

Stephen Cornwell

Subject:

FW: SoCC consultation list

From: Stephen Cornwell **Sent:** 07 February 2019 15:12

To:

Cc: 'Ayles, Duncan'

Subject: SoCC consultation list

Will,

To set this in context, this message following three previous emails dated 18 December 2018, 14 January 2019 & 24 January 2019. These all sought some clarification on the extent of the SoCC and in part raised concerns over the scope of the proposed exercise as outlined in version 2 of the SoCC dated 10 December 2018 and on the number of names that where on the list of non statutory groups.

The following comments should be read in conjunction with those previously submitted, as the points raised in those emails are considered relevant. For ease of reference I have attached those emails at the bottom of this message.

I have confined my comments to groups/bodies that are active within the Winchester CC administrative area.

I have sought views from the elected members and will pass on any comments that are made.

I have also spoken to colleagues within the council who have offered some suggestions. Again if further comments are received then I will pass these on.

I have not seen your Section 42-44 statutory consultees list. I assume that list covers parish councils. Can you please ensure that the parish councils listed below are on it. These are the ones I have identified that lies within the WCC administrative area and within the ZTV. The list errs on the side of caution as this is felt the better approach.

Denmead Parish Council Clerk

Hambledon Parish Council Clerk

Southwark & Widley Parish Council Clerk

Newlands Shadow Parish Council Clerk

Soberton Parish Council Clerk

Boarhunt Parish Council Clerk

I also attach a list of the relevant elected members that reflects this area.

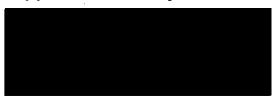
Denmead Ward



Central Meon Valley Ward



Upper Meon Valley Ward



Southwark & Wickham Ward



FYI, I am sending out the occasional briefing note to these PC and elected members.

Finally, relating to the statutory list have you considered consulting the South East Counter Terrorism Unit. They where consulted on a similar scheme by Fareham BC.

Non Statutory List

Turning to the non statutory list, I am grateful for the clarification at the meeting on 31 January 2019 confirming that it is not the responsibility of any LPA to provide the full list of groups that should make up the non statutory list.

Based on that statement and my previous emails to Becg I hope that they have triggered further reflection and investigation which have lead to more groups being added to the non statutory list. I am still of the opinion that more effort needs to be applied to reaching out to people who may use the surrounding area where the presence of the facility may be noticed.

The groups outlined below may need further research before being committed to the list.

It is considered that the Hambledon Parish Council hall should be added to the list of exhibition venues. It was not in table 1 in the December 2018 SoCC. Whilst Denmead is there and might be considered close by, this ignores the large number of groups/people who appear to use Hambledon Village hall and could therefore be reached by the presence of an exhibition. Both Hambledon and Denmead PC halls/community centres accommodate a wide range of groups which are evident from the links below.

https://www.denmeadca.com/regular-activities.html

http://www.hambledon-pc.gov.uk/Local_Directory/Clubs_and_Groups.aspx

Some of the participants in these activities may well fall into the hard to reach category such as the young or old.

Whilst most seem to use the buildings, some clearly use it as a post box or meeting point for activities in the surrounding area. One such group appears to be the Hambledon Village Walks group.

I consider that you should seek to have a display of sufficient prominence to be noticed by people using the respective buildings and also contact **directly** those

groups whose address base may be the hall/community centre but who clearly use the surrounding area.

My information leads me to believe that there is a Denmead Business Club denmeadbf@gmail.com In the general context of the project but thinking specifically of the implications of the cable laying on the B2150 Hambledon Road it would be advantageous to add them to the list

I am not sure how typical a situation it is, but when I was up looking at the site and its surroundings it seemed to me that there where a good number of people working on the existing sub station site. I assume the grid operator is on your consultation list?

The following list of groups focuses on people who may live in the area but mainly focuses on people who may visit the area:

NFU

https://www.nfuonline.com/about-us/our-offices/south-east/hampshire/

Young Farmers (potentially containing people who may fall within the hard to reach category.

seh.hantsyfc@gmail.com

CLA

southeast@cla.org.uk

If you can be absolutely assured that the Hampshire Ramblers group will pass on any information to their sub groups whose interests include that part of the county where the project site lies then fine. If not, (and I doubt it) then I suggest you approach the local groups directly. For example the SE Hants Ramblers & Havant Walking to Health.

https://www.ramblers.org.uk/south-east-hants

https://www.walkingforhealth.org.uk/walkfinder/havant-walking-health

I have struggled a little with the cycle groups. There seem to be a number in this part of the county who are not based specifically in the immediate area but who clearly ride through the area based on observing their typical ride routes. They should be considered just as walkers are:

For example:

Denmead Glow Rides

South Downs MB club based in Havant

Fareham Wheelers Cycling Club

Portsmouth CTC.

Cycling UK are apparently the successors to the CTC. Their web site lists 6 cycling groups within 5miles of Waterlooville.

Following on the theme of people who may use the area I wondered about horse riders and came up with the British Horse Society

http://www.bhs.org.uk/bhs-in-your-area/south/hampshire/hampshire-committee

I did not find an immediate contact for the four by four clubs. I am not sure this means they are inactive in the area or not. Possibly the opportunities to get off road are just not there.

If you need any clarification just ask.

If any additional one arise I will let you know.

Regards

Steve Cornwell

WCC

18 December 2018

Thank you for the opportunity to comment on the revised draft SoCC. Please accept the following observations which I have discussed with Nick Parker:

Notwithstanding that the earlier request for a 13 week consultation period within which WCC would formally comment on the scheme was rejected, this timescale is still considered the most practical to work within. Therefore we repeated the request again.

Paragraph 6.1.9 would be improved if there was a commitment to updating the Aquind web site at specific intervals. Looking at the Aquind web site it is only apparent in the News/Events folder that there are any dates to given a sense of a the last time the site was updated and any chronology to actions.

We question if the Primary Consultation Zone referred to in paragraph 7.2.2 as set out in appendix 2 fully reflects the zone of theoretical Visibility (ZTV) particularly as referred to in the PINS Scoping response of 7 December 2018. This has implication as set out below.

Paragraph 7.3 does not refer to the use of radio and TV as parts of the media to be used to reach out to people. They are considered to have a role if only to help raise consciousness that the project is under consideration.

At the end of section 7.5 you should set out how the comments you receive will be used. Will they eventually form part of the background information in the submission to PINS. You should also specifically set out how you intend to store and deal with peoples personal details and finally how long you will hold this information. I assume your actions are governed by the Data Protection Legislation?

Section 8 Public Exhibitions: By restricting exhibitions to libraries this seems to limit the availability to view the details in an arch across the northern part of the ZTV. The closest location proposed is Horndean. There needs to be some attempt to reach out to this area by some combination of individual letters or via existing bodies such as Parish Councils (letting them hold a copy for people to view) or by setting up temporary drop in exhibitions at chosen locations (Clanfield and Hambledon and possibly other venues depending on how extensive the ZTV is). In addition to the resident population, there is also a need to reach out to people who

might only visit the area periodically (tourists & walkers who are not members of formal organisations).

Section 9 indicates only electronic versions of the proposal will be available to view at libraries. 9.1.4 says hard copies are only available at a cost. Whilst this may fall within the limits of the requirements, one hard copy should be sent to each location. When you are looking at plans on a screen, its is hard to view anything meaningful given the scale they appear at. When you enlarge and focus in you loose the wider appreciation.

| Regar | ds |
|-------|----------|
| Steve | Cornwell |
| WCC | |

14 January 2019

James,

I just wanted to drop you a line regarding the SOCC and the short discussion we had last Thursday during the teleconference.

I do not think the draft minute fully reflects what I was seeking to get across. The minute refers to an "update" once the SOCC consultation responses have been reviewed. I was actually looking for a direct response to the concerns raised that the consultation exercise you are proposing is not extensive enough specifically in reaching out to the community north of the application site. There where also genuine concerns that a simple electronic paperless consultation exercise was not the best way to positively engage. I would not wish to see a response that rests on the view that the requirements of the act have been satisfied. The need to engage with the residents and bodies that live, work and use the land north of the site is a very important issue for us. Consequently, I am not sure that limiting the extent of any actions just to satisfy the requirements of the Act will suffice.

I note that the SOCC consultation period has closed but having undertaken some background reading I am wondering if there is not a missed opportunity here to engage directly with those parish councils and ward members for the area which lies north of the site in both the Winchester and East Hants areas and ask them to use their unique local knowledge and assist in identifying the channels that you can use at the appropriate time to reach out to the local community and the hard to reach groups in the area.

| Is there not time for you to do this now? | |
|---|--|
| Regards | |
| | |

24 January 2019

Tom,

Thanks for the note.

Having done further reading on the matter that took in the Sept 2009 Guidance on pre application consultation and having looked up a number of SoCCs relating to other projects it seems to me that there is more here than just me or anyone else providing a list of people that should be added to your list. As a starting point there needs to be agreement on the extent of the consultation zone (ZTV?) and whether that is split between an inner area and an outer area.

As a first principle, how can we decide which groups etc should be approached if the extent of the consultation area is not agreed?

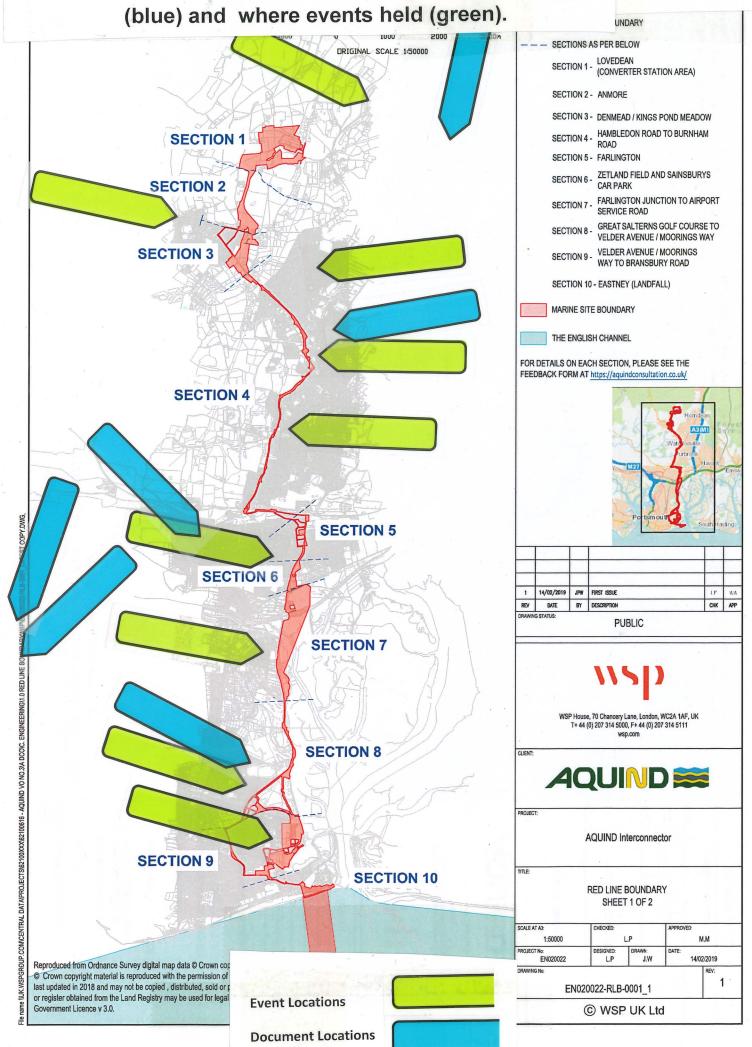
I am not clear if the LPAs are expected under the process to provide all the contact names or whether the applicant is expected to provide the majority with the LPAs just filling in the odd gap. It would be preferable if we worked together on this. Hence my thought that we should discuss the SoCC at the next face to face meeting.

I am happy to discuss this on James return but see a meeting as the best way to resolve this.

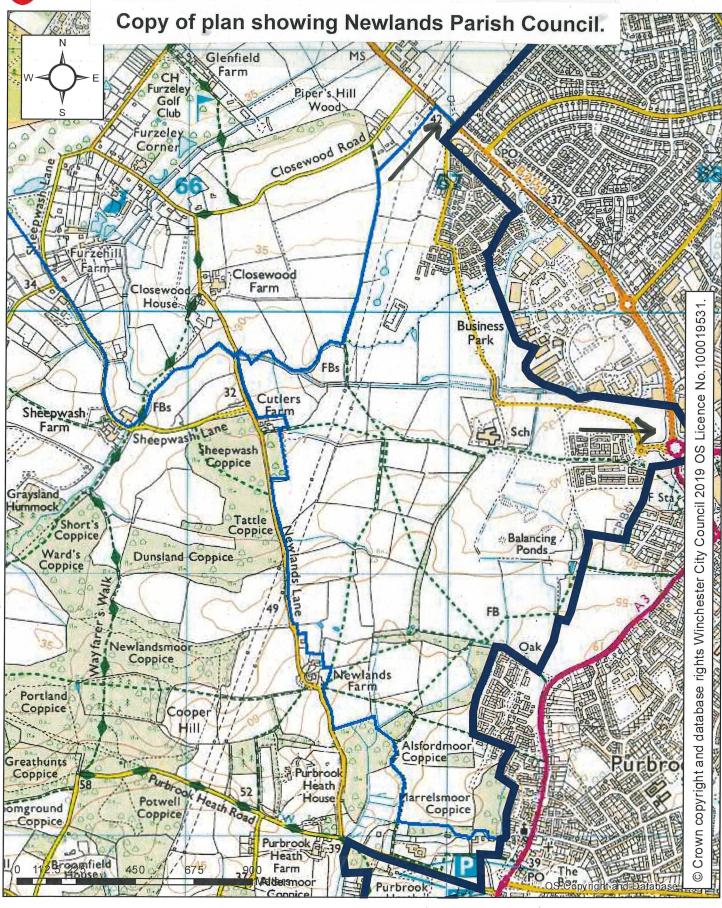
| Steve | | | |
|-------|---|---|-------|
| | | | |
| | • | • | ••••• |
| | ••••• | | |

Plan showing locations where copies of documents held

Appendix C



Winchester Winchester City Council Web Map



Date: 28/11/2019

Scale: 1:14,454.15

Author: Winchester City Council

Map Notes

Notes go here



minutes 29 August 2019.

PARISH COUNCIL OF DENMEAD





Members:

Also present:

154/20P Apologies: Apologies were received from Noted.

155/20P <u>Declarations of Interest:</u> declared a personal interest in item 10, of the AQUIND Interconnector. Noted.

156/20P Minutes of Previous Meeting: The Minutes of the meeting held on 7th August 2019 were submitted for approval. It was RESOLVED that the Minutes be accepted as an accurate record and were duly signed by the Chairman of the meeting.

Public Participation: At 7.35pm the meeting recessed into open forum to allow questions and comments from members of the public. The meeting re-convened at 7.41pm.

158/20P <u>Planning Application:</u> It was RESOLVED that the following comments be forwarded to Winchester City Council.

(1) Denmead Press advert date:

Comments by: 29 August 2019
Date Valid: 17 July 2019
Decision due: 11 September 2019
Team: Case Officer: LEGAL

Applicant:

Proposal: Use of land to station a mobile home/family annexe for use incidental to the main dwelling. Location:

The Parish Council of Denmead expressed its view that the Lawful Development Certificate for proposed use, should have been submitted as a planning application. The Parish Council of Denmead, by a unanimous decision, raised an **OBJECTION** to the position of the mobile home/family annexe, which would be nearer to the neighbours' boundaries rather than the dwelling and therefore it was considered to be detrimental to the amenity of all the neighbours.

(2) Denmead
Ref No: Not Available Press advert date:
Comments by:

Comments by: 3 September 2019
Date Valid: 24 July 2019 Decision due: 18 September 2019
Team: Case Officer:

Applicant:
Proposal: Conversion of garage into

Conversion of garage into habitable room, including new window to south elevation in lieu of up/over

door and new (repositioned) garden shed to rear of garage.

Location:

The Parish Council of Denmead, by a unanimous decision, raised NO OBJECTION to this proposal.

| (3) | Denmead | |
|-------------|----------------------------------|--------------------------------------|
| | | Press advert date: |
| | | Comments by: |
| Date Valid: | 29 July 2019 | Decision due: |
| Team: | | Case Officer: |
| Applicant: | | |
| Proposal: | | Date of Decision: 10/06/2019 |
| | Condition(s) Number(s): 2 | |
| | Condition(s) Removal: | |
| | Variation of condition 2 to allo | w habitable rooms in the roof space. |
| T /! | | or a second Production |

Location:

(4)

The Parish Council of Denmead, by a unanimous decision, raised a STRONG OBJECTION to this proposal and cited the following reasons:

- The officer's report advises for the permission already granted that "The dwelling is of a size appropriate to the productivity of the holding (120-150 sqm) including office space)" and "The dwelling that has permission would introduce a smaller dwelling to a countryside location which is considered acceptable."
- The dwelling that has permission was 120 sqm with no office space, as this is accommodated in another of the numerous buildings on site.
- This application takes the dwelling to 171 sqm with no office space and is therefore contrary to Winchester District Local Plan Part 2, Policy DM11 and in conjunction with Winchester District Local Plan Part 1, Policy MTRA 4 for Development in the Countryside.
- This application introduces a large dwelling in a countryside location along with the undesirable domestic clutter associated with a 3-bedroom house rather than a 1-bedroom bungalow.
- There is no justification provided for this application.

Denmead

Should there be a conflict of views between Members comments and the Case Officer, Members would wish for this matter to go to the Development Control Committee.

| Ref No: | | Press advert date: | | |
|---------------|-----------------------------|----------------------------------|--|-----|
| Case No: | | Comments by: | 10 September 2019 | |
| Date Valid: | 30 July 2019 | Decision due: | 24 September 2019 | |
| Team: | | Case Officer: | | |
| Applicant: | | | | |
| Proposal: | Single storev side extens | on. | | |
| Location: | | | | |
| The Parish Co | ouncil of Denmead, by a una | animous decision, raised NO OB | JECTION to this proposal. | |
| | | | | |
| (5) | Denmead | | | |
| Ref No: | Not Available | Press advert date: | | |
| Case No: | | Comments by: | 18 September 2019 | |
| Date Valid: | 1 August 2019 | Decision due: | 26 September 2019 | |
| Team: | | Case Officer: | The state of the s | |
| Applicant: | | | | |
| Proposal: | Demolition of existing s | ide and rear lean-to conservator | ry. Erection of new day room and kitch | hen |
| | extension to side and rear | | | |
| Location: | | | | |

The Parish Council of Denmead, by a unanimous decision, raised NO OBJECTION to this proposal.

(6)

Denmead

Ref No:

Case No:

Date Valid:

Team: Applicant: 12 August 2019

Press advert date:

Comments by: Decision due:

Not Available 7 October 2019

Case Officer:

Proposal:

The work is to two ash trees located to the rear of

Tree 1 – Crown reduction by 3m to 3 lowest lateral limbs to clear neighbour's property and to let in more light.

Tree 2 – Crown reduction by 3m to 2 lower lateral limbs and to remove dead limbs to improve health of tree. This tree has previously been reported for suspected Ash tree dieback.

Location:

The Parish Council of Denmead, by a unanimous decision, raised NO OBJECTION to this proposal.

Decisions Received: A list of decisions by Winchester City Council had been received and copied to 159/20P members for their information. Noted.

Appeals:

160/20P

(a) Appeal Reference:

The Chairman informed members that the Appeal Hearing, which she had attended, had taken place on 28th August 2019. It was noted that the Applicant had a planning officer and barrister present, although no legal representation had been provided by WCC. The Applicant's barrister referred to the fact that there would be no-where for the Applicant to locate if the Appeal were to be dismissed because there is not a five-year supply of land available in the District. This is despite the fact that Winchester District Gypsy, Traveller and Travelling Showpersons Development Plan had been adopted in February 2019.

commented that he was disappointed that WCC was unable to defend its own Traveller DPD policy. Furthermore, he felt that poor representation was provided by WCC at the Hearing. stated that DPC had been told that there would be no opportunity to speak at the Hearing, although permission had been granted from the previous Inspectorate in January 2019. Two

District Cllrs, local associations and neighbours were all given the opportunity to speak with the exception of The Chairman. It was therefore unanimously RESOLVED that a letter should be sent to WCC to express DPC's concerns. It was further RESOLVED that this matter should also be addressed with the Enforcement Officer, who was due to attend the Planning Committee meeting on 9th October 2019.

Outstanding Matters and Matters Arising: There were no outstanding matters or matters arising to be 161/20P considered. Noted.

162/20P Correspondence: There was no separate correspondence to consider. Noted.

163/20P **AQUIND Interconnector:**

(a) Recent Surveys Undertaken on Parish Council Land: Correspondence, in the form of a memo, had been received from AQUIND in relation to the procedures used to carry out all the surveys on Parish Council land at Goodman Fields. The results of the Arboricultural survey undertaken in May 2018, are now advertised on the AQUIND Consultation website. The other surveys which had included Ecology, Aquatic Ecology, Great Crested Newt, Agricultural Soil and Archaeological are still under analysis but official results would be presented within the Environmental Statement, as part of the DCO Application for the AQUIND Interconnector. Noted.

164/20P

(b) Meeting with AQUIND: A meeting with AQUIND had been held on 19th August 2019 with District Councillors and members of Denmead Parish Council. The Chairman had challenged AQUIND in relation to the methodology used for informing local residents during the consultation process. She had stated that Denmead was not given sufficient involvement in the process, and that AQUIND's claim of extensive consultation to 90,000 people was misleading. She continued that Denmead should be receiving some kind of benefit from the Nationally Significant Infrastructure project (NSIP). One of the District Councillors questioned why the countryside route was not being considered for the installation of the cables, as there was a concern that residents would experience a high level of disruption, with the potential of one-way traffic only being permitted along the Hambledon Road for a six-month period. Informed members that unfortunately AQUIND did not address any of their concerns adequately but she concluded that the Parish Council would strive towards obtaining a more positive outcome on behalf of Denmead residents. Noted.

having previously declared a personal interest in the above item, took no part in the

165/20P

debate.

Matters Relating to Building Developments within the Parish:

<u>Carpenter's Field Development:</u> Correspondence had been received from the Senior Development Planner, in which an update had been provided in his absence.

- The 278 Agreement is in the process of being finalised so that the new access and road can commence.
- The first release of properties to be delivered in Phase 1 of the development have now been advertised on the Charles Church website. This includes descriptions and costings of 2 bedroom bungalows and 3 bedroom detached houses.
- The contract with the affordable housing provider has now been completed.

166/20P

<u>Denmead Neighbourhood Plan:</u> The Chairman confirmed that DPC would be updating Denmead Neighbourhood plan in readiness for publication by 2021. She stated that copies of DNP had been distributed by herself and other Cllrs at the recent Denmead Summer Horticultural Show. To obtain early feedback by residents as part of Community Engagement, individual residents were encouraged to provide ideas of their desired changes and improvements by amending their own copy of the DNP with a red pen. Once copies had been returned to the Deputy Clerk at the Parish Council Office, all results would be collated and then considered by Council in preparation for the update of the DNP. **Noted.**

167/20P

New Planning Applications: There was one new application received. Noted.

168/20P

Exempt Business: It was RESOLVED, that in accordance with the Public Bodies (Admission to Meetings) Act 1960, to exclude the public and press for the discussion of the following matters where publicity might be prejudicial to the special nature of the business namely Enforcement Matters, Listed Buildings, Confidential Discussions and Tree Preservation Orders.

The meeting closed at 8.40pm.

The next scheduled meeting of this Committee will be held in The Old School, School Lane, Denmead at 7.30 pm on Wednesday 18th September 2019

| Signed: | Date: | |
|---------|-------|--|
| | | |

PUBLIC SESSION ~ Planning Committee Meeting 28th August 2019

| (1) Case No: Date Valid: Ref No: Applicant: Proposal: Location: | Denmead 17 July 2019 Use of land to station a mobile ho | Comments by: Decision due: Case Officer: ome/family annexe for use | 29 August 2019 11 September 2019 LEGAL incidental to the main dwelling. |
|---|---|--|---|
| The Chairman sproceeded to re | stated that four comments of objead. | ction from local residents | had been received, which she |
| the neighbouring there could be a | enificant inconvenience to the clo | sest neighbours, particula also expressed their conce oner purchased the proper | ern in relation to the fact that ty and therefore there may not |
| the amount of s | ars living at in their privacy from the positioning sunlight from their gardens and all sell their properties in the future. | ng of the mobile annexe. | xpress their concerns in relation They said that it would reduce I have a potential impact on |
| | | | |
| (2) Case No: Date Valid: Ref No: Applicant: Proposal: | Denmead 24 July 2019 Not Available Conversion of garage into halieu of up/over door and new | Comments by: Decision due: Case Officer: abitable room, including repositioned) garden shee | 3 September 2019 18 September 2019 new window to south elevation in the to rear of garage. |
| Location: Comments of s | support had been received by a ne | | |

Comments of support had been received by a neighbour living next door, in relation to the Applicant's agreement to install obscured glass only in the UPC window which is proposed to be installed at the side of the garage conversion.



Copy of Response letter to PEIR

Appendix F

Winchester

Development Management

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telephone calls may be recorded

website www.winchester.gov.uk

Aquind plc

Case No:

19/00522/NSIP

Your Ref:

Eng to:

Mr Stephen Cornwell

Direct Dial:

Please quote 19/00522/NSIP on all

29 April 2019

correspondence

Dear Sir

Subject: National Strategic Infrastructure Project to be considered under Planning Act 2008 (as amended) by Aquind plc consisting of cross channel electricity connection, with landfall at Eastney, underground cable routed along highway to converter station adjacent Lovedean sub station Broadway Lane Waterlooville.

I refer to the above mentioned project which is currently in the pre-application stage for consideration as a National Strategic Infrastructure Project. This letter contains the formal response of Winchester City Council (WCC) to the Preliminary Environmental Impact Report (PEIR) and the Consultation Document which where put out as part of a consultation exercise running from Wednesday 27 January 2019 to midnight on Monday 29 April 2019.

Introduction

Winchester City Council (WCC) is the host authority with regard to the proposed location for the interconnector station. Whilst the comments will focus on this element of the scheme, sections of the proposed cable route also fall within the WCC administrative area and comments will also be made on the information provided in relation to this aspect of the scheme.

The local planning authority (LPA) notes the status of the proposal and the following comments have been framed to reflect the current stage in the pre application process. In that context, the majority of the comments below are encouraging the applicant to present greater clarity on specific issues and undertake further engagement with the interested local planning authorities. WCC remains committed to working with Aquind in accordance with the spirit that the guidance note recommends.

Two aspects that are outlined below do raise a question of whether the proposal can move on to the next phase without a pause to address outstanding procedural issues. Firstly, the failure to consider alternatives for the cable route and assess them against the chosen route set out in the documents. Secondly, the inconsistent and incorrect use





of terminology and data relating to the duration when sections of the local road network will be impacted by the cable laying operations.

The comments below relate to the PEIR and are structured under the appropriate chapter headings. Where appropriate, references will be made to the Consultation Document. The comments have drawn on views from other colleagues within the authority. In accordance with the planning committee resolution of 19 April 2019 this response has been discussed with the Portfolio Holder for Built Environment.

Chapter 2 Alternatives

The interconnector station

Within an environmental statement the applicant is obliged to include information on the main alternatives they have studied and the reasons for their choice. This is considered to apply to both the choice of the location for the interconnector station and the cable route.

Paragraph 5.9 of the Overarching National Policy Statement for Energy (EN-1) (ONPS EN-1) notes that National Parks should have the highest protection (5.9.9) and that there is a duty to have regard to the purposes of nationally designated areas regarding schemes for locations outside a national park that may have an impact upon them (5.9.12).

The choice of Lovedean as the location for the interconnector station needs further explanation so it is an open and transparent process. The proximity of Lovedean to the South Downs National Park and its impact when viewed from within the park, does not appear to have been a factor in the decision to choose this site over Chickerill in Dorset. The technical requirements appear to hold primacy above everything else. The first indication that any consideration has been given to the National Park designation is in the choice between the various site location options at Lovedean (2.5.2.1).

The onshore cable route

The final section of the cable route past Waterlooville (excluding a short section of the Hambledon Road) lies within the administrative area of WCC. However, WCC feels it is entitled to review the choice of the A3 up to Waterlooville as this route dictates the position where the cable route enters the WCC administrative area. In this review no preference is given to the merits of Eastney as the landfall point or of the choice of the cable route up through Portsea Island. The concern of WCC is that the PEIR document does not appear to show that any consideration has been given to any alternative other than the A3 route once past its junction with the B2177 (Portsdown Hill Road).

The only assessment of cable routes within this chapter is made in the context of the alternative land fall points and how they might lead to Lovedean. Once Eastney was identified as the preferred landfall point the cable corridor seems to have become fixed in so far as the section up the A3 is concerned. It is considered that the review of alternatives such as that applied to the location of the interconnector station, should have equally applied to the cable route. The 2017 Regulations require an Environmental Statement to include "a description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an

indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects."

This has not been undertaken in so far as the cable route up the A3 is concerned.

The need for such a review is necessary as a potential and realistic alternative may exist. This is the "countryside route" running northward through land to the west of the built up area of Widley and Purbrooke. A plan is attached to this comment showing an indicative route. Whilst the countryside route may have some constraints, the road route is not without its complications. The benefits of the road route appear to favour the applicant, with all the negatives aspects falling on the public and public bodies. These constraints are not simply confined to the delays that road users will suffer, but will also extend into the future as the presence of the cable hinders road infrastructure improvements over the next 40 years (the life of the cable). Measures by Aquind to address these concerns such as laying the cable at depth are likely to increase costs and installation time with the consequential additional delays to road users. The difference in the installation speed with more rapid progress across open ground than on the highway is a factor already acknowledged by Aquind.

Without an open assessment of the merits of the alternative cable routes, it is difficult to see how the applicant can show that a meaningful evaluation of the options (as required by the regulations) has taken place. This applies even if the outcome where to support the road option. Accordingly, the project should pause so that the options can be assessed in close discussion with the relevant local planning authorities (LPAs). Within that process, the constraints and benefits of the alternative routes can be fully reviewed.

Building Design

Whilst the converted station consists of a range of buildings and items of plant, the most prominent in terms of size, are the two convertor halls. Overarching National Policy Statement for Energy EN-1 acknowledges that the nature of a facility can limit the extent of good design (4.5.1). However, it also states that applicants need to demonstrate how the design process has been conducted and how the design evolved (4.5.3).

The PEIR does not appear to contain any detail regarding the design approach for these buildings. The only reference to the design is in the Consultation Document under 2.4.13 Design Parameters. WCC has previously expressed a view that in the context of the sensitive rural location, the building design should be a specific section in its own right within the Environmental Statement. That view is maintained in this response.

In the view of WCC the scheme continues to lack a clear justification for the design approach that is being followed which is shown as a simple box shape building. Consideration appears to have moved onto the cladding options without any consideration of the basic outline form that the building should adopt in the context of its surroundings. WCC continues to seek engage in discussions on the overall design of the converter halls. This should include consideration of reducing ground levels and screen planting at various positions (near distance, middle distance and far distance).

A review of several Development Consent Orders provides no confidence that this issue can be left to the design code for a resolution. In the view of the LPA, it must be considered now and established before the examination stage. Accordingly, for there to

be any meaningful engagement it must form part of the pre application discussions between the applicant, WCC, East Hampshire BC and the South Downs National Park authority.

The views of the Urban Design Officer have been sought and the following is taken their comment:

It was clarified during the process, on a meeting with representatives officers of all councils involved, how much the building design of the Converter Station are constrained by its operational requirements. Therefore it was explained that the design inspiration for the proposed building is the SDNP with its distinctive colour palette and undulations. And the applicant believes that through creative treatment of the façade, the building could seemingly blend into its surroundings.

It doesn't seem a good approach to reduce all the design process of such a large building to a simplistic exercise of how the elevations should be 'dressing up'.

In terms of building form it doesn't seems to have been explored or demonstrated other options that could address better the surrounding context or that would help to minimise the visual impact such as, partial burring the building into the ground supported by a robust landscape treatment strategy.

As well, in order to have an opinion of how much the building should be perceived from distant or close views, the proposed should be supported by a robust character and context studies to illustrate how that has informed the design including the site plan, massing, heights and the buildings' character and appearance.

Therefore, from a design perspective it is not clear how the design principles informed the building form and why the design should comply with defined parameters.

It is considered that a more holistic approach in terms of setting and design should be taken in consideration in order to achieve a greater landscape-led design concept. Good design should be take place whether a building can be seen or not from public view

The process to date has also constrained wider public engagement in the design question which is considered a negative step. Opportunities to present the public with options have not been taken. The ability of the applicant to show genuine engagement risks being lost.

Any new planting to screen the site will take a substantial time to develop into any meaningful feature. This means that the buildings will be in view for a long period of time before they are screened and from some locations, the building will always be open to view. Accordingly, its design and how it fits into the rural landscape is a significant issue.

Based on the above, WCC wishes to see further discussion on the design issue in conjunction with other related elements.

Chapter 15 Landscape & Visual Impact Assessment

The sensitivities of the site are well known and recorded. The landscape officer has provided the following comments:

At 2.4.18 of the Consultation Document it is stated that 'Landscape mitigation will be provided in order to screen the building as effectively as possible'. And yet at Figure 11, where a view is shown from Viewpoint B at '20 Years Post Construction', the buildings are not 'screened' at all.

The draft mitigation plan at figure 10 on page 36 shows the proposed converter station taking out a substantial belt of woodland. If the footprint were moved just 25m further east this existing 'screening' could be retained.

If a decision is taken to screen the building as far as possible, as a principle of design from the outset of the project, given the environmental sensitivity of it's location, then considerably more effort will be required, both to retain existing woodland and conceal the building using planted bunds or earthwork. There is still an expectation that the footprint could be set at a lower level. There is nothing in the soils or groundwater chapters to show why this is not feasible with the resultant material then used as part of any landscaping scheme.

If on the other hand a design decision is taken that efforts to 'screen' the building will be futile, then the design and appearance of the building assume greater importance, particularly as it will be viewed from within the National Park.

2.4.13 of the Consultation Document discusses how the building will appear in the landscape. It is stated that the architect's approach has been to draw design inspiration from the colour palette of the South Downs with the intention of the building blending into its surroundings.

However, I remain unconvinced that the colours chosen will ever 'blend' with a constantly changing landscape. The colours in the landscape change with different weather conditions, different seasons, different lighting conditions and even different times of day. Attempts to blend with the landscape by mimicking its colours are rarely successful. It is recommended that instead, Aquind choose visually recessive tones or darker colours which have the effect of reducing the apparent bulk of the building, for example

- RAL3007 Black Red
- RAL 5008 Grey Blue
- RAL 6009 Fir Green
- RAL 6015 Black Olive
- RAL 7021 Black Grey
- RAL 8019 Grey Brown.

The landscape impact needs to be considered as part of the overall design issue and WCC will continue to respond positively to any invitation to discuss this further.

Within the Consultation document there is an annotation on Figure 15.9 (Landscape Mitigation Plan) to planting beyond the red lined application site but no indication how this is to be achieved. In a similar vein, the photomontages from the viewpoints rely on vegetation to screen the view, but offer no indication of how that vegetation will be retained and maintained. An opportunity exists for the applicant to adopt the concept of the Environment Fund which has been raised at a previous meeting. This would be a mechanism to achieve or retain the off site planting referred to above.

Chapter 16 Onshore Ecology

The level of comments on this section has to reflect the fact that the applicant is still formulating the information on biodiversity.

The evidence base that is outlined gives the impression that it has recorded evidence of animal species as static features and no consideration in the predicted impacts appears to have been given to the implications of the compound acting as a barrier to the movement/migration of species across the land, or the use of the "airspace" by birds or bats. This applies to both the construction phase when the affected area will include the compound/laydown area and during the operational phase when the site will be secured by wire mesh fencing.

No consideration is outlined regarding the implications on biodiversity of constructing the access road which is to be retained during the operational phase. A 7.3m concrete road will form quite a barrier severing movement from the open land to the south and west towards Stoneacre Copse which is an the ancient woodland. This applies to both the construction phase and the operational phase.

WCC considers that the scheme should incorporate a greater degree of mitigation work and is open to working with Aquind in identifying the extent and scope of that work before the formal submission stage. As part of that position, WCC considers it would seem sensible to "future proof" the analysis by factoring into the proposal some biodiversity net gain. This is referring to the proposal to require all development to result in a positive improvement in biodiversity. This goes beyond any mitigation proposed. It seems this requirement is likely to be in force when the examination stage is reached following changes to regulations which are currently being reported in the press.

Chapter 20 Heritage

I offer the following comment which draws heavily on the view of the Archaeological Officer:

Most of the greenfield areas lie in Winchester district and you are proposing to undertake GS over these areas as previously discussed, so this is fine. Just one query, when you say First Stage GS (blanket magnetometry), are you proposed detailed survey or just scanning?

Regarding the JB areas, JBs 45 and 46 also lie in Winchester district and not within Havant.

Re the exclusion of JBs 38 & 44 from the proposed GS, I agree that these can be excluded (JB38 - as this has been subject to previous GS and evaluation trenching in connection with the Waterlooville MDA and no further archaeological mitigation work has been required in this area. JB 44 is excluded as it is currently a car park /

unsuitable for survey; this area could be looked at during a later stage of this iterative programme of evaluation work.

I look forward to receiving a WSI for the GS in due course.

Has the archaeological monitoring of geotechnical SI works which we corresponded on in April last year been completed yet? I assume that this report will be made available in due course, to consider together with the GS results?

The engagement between the applicant's archaeologist and the Councils officer will continue.

Chapter 21 Traffic & Transport

The site access lies within the EHBC administrative area and comments on the approach are left to EHBC and Hampshire County Council.

Cable Route

Whilst fully supporting the position that questions the alternative cable routes as outlined above, the LPA makes the following observations on the cable route as shown in the Consultation Document and as set out in the PEIR.

At the A3 (London Road) and B2150 (Hambledon Road) roundabout the cable route crosses into Winchester District before exiting part way along the Hambledon Road and then re-entering the district for the reminder of its route up to the interconnector station.

The Hambledon Road B2510 is the main link into and out of Denmead from the east and the most direct route from Hambledon to the A3. No other practical alternative exists. The degree of disruption in the event that the road is excavated with traffic light controlled flow cannot be underestimated. It is surprising that Aquind do not have full data on projected traffic delays arising from shuttle working that could be extrapolated into how long a vehicle might be delayed.

Section 3.6 of the Consultation Document sets out the current alternatives for the route through/past Denmead.

The option of running a single circuit (one group of cables) down each of Mill Road and Martin Road with all the implications that has for residents is not favoured. Some practical alternative has to be found.

Of greater concern is the presentation of the data relating to the level of disruption that will occur (worst case scenarios). The figures presented in Section 3.6 of the Consultation Document are inconsistent in their use of the terminology. In places they refer to all the work within the road but elsewhere they only refer to the installation of one circuit and in other sections carry no clarification. The full installation will involve two circuits. Consequently, the figures given should be doubled. On page 61 it states:

The estimated worst case traffic disruption associated with the trenching of **each circuit** (my emphasis) on this route is approximately:

• B2150 Hambledon Road between Soake Road and Milton Road - 66 days shuttle working.

- B2150 Hambledon Road between Milton Road and Maurepas Way 28 days single lane closure
- A3 Maurepas Way 17 days single lane closure
- Forest End 9 days full road closure A3 London Road between Maurepas Way and Ladybridge Road 44 days bus lane closure, 28 days shuttle working and 1 day full closure north of Ladybridge roundabout
- A3 London Road between Ladybridge roundabout and Portsdown Hill Road 61 days bus lane closure and 18 days shuttle working
- · Boundary Way slip road 4 days shuttle working

All the above figures should be doubled to show the correct period of time when the roads are subject to some work (worst case). The consequence of a corrected assessment means that a regular traveller driving from the centre of Denmead to Waterlooville (worst case scenario) would encounter a delay at some point on that road over a period of 9.4 months. Not the 4.7months that is implied in the document. It is a concern that members of the public may not have understood the full implications of the duration of the work programme when they have been engaged in the most recent consultation exercise.

As concerning as the above point is, there is a more fundamental issue that this data has been used in it uncorrected form in the PEIR to arrive at the information in Appendix 21.2 Traffic Delays on Cable Corridors. This analysis sets out the magnitude of the impacts arising from the installation work. Link 4.1 refers to the section of the Hambledon Road and uses the 66 day construction period that appears in the extract from the Consultation Document that is copied above. The impact for this section of road is rated as "Moderate Adverse". If the correct duration was displayed (132 days) the rating may have been greater.

There are other examples where only half the time period has been used in assessing the significance of the effect on road users. WCC has not reviewed any of the data in Table 21.2 south of the A3 and B2510 roundabout but the question must be asked whether other results are also based on the use of only half the true disruption period. If so, this is a significant flaw in the data which all interested bodies including members of the public have read and used to make up their view on this element of the scheme.

For some people the traffic implications may have been the most important consideration. This matter is not something which can be casually passed over and corrected at the next stage of the process. Whilst WCC and the other authorities will be in contact with Aquind, for the public the next opportunity to view and comment would be the examination stage. It is questioned if Aquind can reasonably present people with corrected figures at that stage in the process when no options or alternatives are available. Aquind does not know how many people may have viewed the details and not responded based on the incorrect figure. Had the true level of disruption been presented it is possible a higher number of people would have responded.

The other implications of underestimating the traffic disruption are on the other sections of the PEIR and most significantly on how it might affect the balance in weighing up the merits or otherwise of the alternative countryside route. It should be noted that if

adopted, that option would have no direct impacts on Denmead and only a marginal short term impact on Hambledon Road as it was crossed or drilled under.

The use of part of the site at Lovedean as one of the two temporary compounds (paragraph 21.4.12.11) to support the cable laying should be clarified in more detail specifically regarding the traffic implications of importing and then exporting the cable drums and the route that would be adopted to reach the northern edge of Denmead. The identification of an alternative temporary compound should be sought.

Chapters 22 (Air Quality) and 23 (Noise and Vibration)

The Environmental Health & Licensing Officer has made the following comment:

I have no adverse comment to make on the issues and scope identified in either of these chapters. With regards to noise and vibration this is recognised as a potential adverse impact. However, the detailed modelling and mitigation proposals will not be provided until the plant design criteria have been finalised. These will be available in the final Environmental Statement, so detailed assessment cannot be provided at this stage.

Chapter 24 Socio Economic

The range of mitigation measures needs to be more expansive.

Chapter 27 Carbon and Climate Change

Notwithstanding the mitigation measures set out in paragraph 27.7 there will still be a net increase in the carbon footprint resulting from the development. It is considered that the applicant should broaden the scope of the mitigation to include more innovative measures relating to works both within the red lined site and off site.

Conclusion

Winchester City Council stands ready to engage with Aquind in discussing all the issues identified above.

The most immediate action is to address the two procedural concerns outlined above in the introduction. Firstly, the alternative route for the cable run and secondly, the reliability of the data on road disruption. It is worthy of note that if the former proves to be a viable option then it could ease or virtually eliminate the latter north of the B2177. It is noted that the scheme is still within the formative pre application stage. However, both of the elements identified above have implications not only on the views and responses of the statutory consultees but also on the involvement of the general public and how they view the scheme and participate in the process. These are not matters than can be simply acknowledged as the scheme moves on to the next stage. Engagement in the pre application stage and the recording of that contact must count for something. If elements of the pre application work are procedurally flawed then they need to be addressed before the scheme advances. Progress into the next phase should be paused to review how to remedy the situation. This discussion should involve the applicant and the local planning authorities so that confidence in the process is maintained.

Action is also required in terms of site recording to address the ecological concern that the development may act as a migratory barrier to the movement of wildlife and also restrict air space for birds and bats.

In addition, WCC wishes to engage in meaningful discussions on a range of community benefits which a scheme of this nature should bring forward. Whilst some references have been made to circumstances where such action offers opportunities, a more extensive outline will be prepared in a separate position paper.

If you have any queries or require further information, please do not hesitate to contact the Case Officer, Mr Stephen Cornwell on 01962 848 485.

Yours faithfully

Julie Pinnock BA (Hons) MTP MRTPI Head of Development Management