



**Winchester**  
City Council

**Development  
Management**

City Offices  
Colebrook Street  
Winchester  
Hampshire  
SO23 9LJ

tel 01962 840 222

fax 01962 841 365

telephone calls may be recorded

website [www.winchester.gov.uk](http://www.winchester.gov.uk)

Mr Hefin Jones  
Case Manager  
National Infrastructure House  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN  
GL5 3BY

Enq to: Mr Stephen Cornwell  
Direct Dial: 01962 848 485

Sent by email only.

31 March 2020

**Your Reference:** EN010085

Dear Sir

**Planning Act 2008 – Section 88 and The Infrastructure Planning (Examination Procedures) Rules 2010 – Rule 6**

**Application by AQUIND Limited for an Order Granting Development Consent for the Aquind Interconnector Project.**

**Notice of appointment of the Examining Authority and the date, time and place of the Preliminary Meeting.**

**Town and Country Planning (General Development Procedure) Order 1995**

I acknowledge receipt of your letter dated 5 March 2020 together with the attached annexes, in which you invite interested parties to register to speak at the Preliminary Meeting. I note the suspension of the Preliminary Meeting that was scheduled to take place on 22 April 2020 and we aware any further developments. However, we are submitting this response in accordance with the original deadline of 1 April 2020.

Please accept the following as the formal response of Winchester City Council.

Officers do wish to attend and speak when the Preliminary Meeting takes place.

Those wishing to speak or have the option to speak will be the following:

**Simon Finch** BSc (Hons) Lond, DipTP, MSc, MRTPI **Head of Planning Management**

printed on recycled paper



Catherine Knight (Councils Solicitor)

Stephen Cornwell (Planning Officer)

It is also intended for two other colleagues to sit in and observe. They will not speak. I have made reference to them should you wish to know general numbers for laying out the chairs behind the speakers.

Your letter also invites comments on the provisional agenda and an indication of the issues to be raised. In response I have set out the following.

**Index:**

- 1 General Approach to Preliminary Meeting
- 2 Venue and Agenda Detail
- 3 Principle Issues
- 4 Additional Topic Issues
- 5 Request for Site Inspections

**1 General Approach to Preliminary Meeting**

- 1.1 It should be noted that this response has been limited to addressing the specific issues around the Preliminary Meeting and should not be interpreted as outlining the full extent of the matters WCC wishes to comment on during the Examination Stage. This will be outlined at the appropriate stage in the Local Impact Report.

**2 Venue and Agenda Detail**

- 2.1 Winchester City Council (WCC) has read the draft examination timetable that was attached as annex C to the letter of 5 March 2020. WCC notes and fully supports the possibility of there being more than one location for Issue Specific Hearings (ISH) or Open Floor Hearings (OFH). Some of the topics do lend themselves to such a north/south division and WCC would ask the Examination Panel to move forward on this basis. WCC is aware that this will depend on the identification of an appropriate venue and it has over past months offered Aquind a number of possible locations.
- 2.2 In the event that no suitable northern venue is identified and all the hearings take place at one central location, WCC asks that there is a clear separation in the agenda for consideration of north and south topics where such a distinction is relevant.
- 2.3 Winchester City Council requests clarification on where the opportunity exists within the hearing procedure for it to raise with Aquind the issue of the degree to which the practicalities of laying the two cable circuits in the highway has been examined. Will this arise in ISH2 under the Transport and Traffic topic?
- 2.4 Winchester City Council requests clarification that the issues around the trans border implementation of the scheme will be addressed during discussion of the Draft Development Consent Order. It would clearly not be appropriate for work to

commence on UK side of the Channel if approval has not been obtained on the French side.

2.5 Winchester City Council has noted the recent Court of Appeal Ruling regarding the Heathrow runway expansion and the issue of the government's climate change commitments. National Policy Statement EN-1 is central to the applicant's case

2.6 Winchester City Council invites the Examination Panel and Aquind to make a statement of the status of EN-1 and how it will be interpreted during this application and the recommendation which has been central to the applicant's case.

### **3 Principle Issue 1**

#### **3A Consideration of Alternatives**

3.1 The applicant has indicated that they have voluntarily committed to submit an Environmental Impact Statement (EIS) in support of the application (6.1.4.1.3). In doing so, it follows on that they will adhere to the requirements of the regulations governing the submission of any EIS. Schedule 4 of the EIA regulations 2017 relates to the consideration of alternatives.

3.2 From the details submitted, there is considered to be a lack of evidence to suggest that the applicant has considered in sufficient detail the option of taking the cables up through the open countryside west of the A3 corridor. In the view of Winchester City Council (WCC) this oversight must be corrected by both a more thorough review of the merits of the two routes (pros and cons of the countryside and road routes) and also through a limited consultation exercise to allow public views to shape the decision.

3.2 In discussing the cable route, WCC makes no judgement on the merits of Eastney as a landfall point. The discussion also assumes that Aquind have been able to more clearly justify the choice of Lovedean as the connection point to the grid.

### **Principle Issue 2**

#### **3B Lack of Consultation with local Community**

3.3 WCC responded to the letter dated 15 November 2019 which sought confirmation that the applicant has complied with the relevant 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. WCC accepted that Aquind had complied with the requirements of Section 42 and 48. This response is recorded in the acceptance folder under the “Adequacy of Consultation Representations”.

3.4 However, questions were raised regarding Aquinds compliance with Section 47 of the Act, specifically how Aquind had reached out to those sections of the community that live within the area potentially affected by the presence of the

converter station and those whose use of the Hambledon Road may be disrupted by the cable laying operations.

- 3.4 WCC has read the Planning Inspectorate response to its concerns which is set out in the Section 55 Acceptance of Application Checklist. This is not felt to directly address what are considered to be the shortfalls in the applicant's actions. Whilst noting the concerns of WCC, the response or rather justification for seeking no further action by Aquind is that they undertook their consultation of the local community as they said they would in accordance with the actions set out in the SoCC. On the basis WCC was challenging the adequacy of the measures set out in the SoCC this response is difficult to accept. Simply put, WCC had concerns that the measures to reach out to the local community were inadequate. From the WCC perspective the assessment by the Planning Inspectorate appears to be stating that whilst the SoCC may have been deficient, on the basis Aquind followed it, they have complied with Section 47.
- 3.5 WCC intends to raise this matter at the PM and seek clarification on whether it should be considered at this point in time or at a later date in the examination process.

#### **4 Additional Topics**

- 4.1 Winchester City Council Winchester City Council requests that the following issues are considered for discussion at Issue specific hearings:
- Socio Economic Effects of the scheme and its benefits to the local community.
  - Climate Change and the Carbon balance of the scheme.

#### **5 Requests for Site Visits**

- 5.1 Winchester City Council notes the unaccompanied site inspections undertaken by the Examining Panel to date.
- 5.2 Winchester City Council wishes to attend the site inspection regarding the main site for the Converter Station and the access roadway. A request is made as to whether the four corners of the Converter Station compound can be defined on the ground using marker posts during any site visit.
- 5.3 A request is made that WCC attend the site visit to Kings Pond. Furthermore that if circumstances allow, this visit is timed to reflect the presence of the orchids and that the proposed compound is defined on the ground. This is the period May through to July.
- 5.4 The ExPanel is requested at some time in the Examination Stage to undertake an unaccompanied site visit to view the site from Portsdown Hill to the south. The visit may be an opportune time to note the general characteristics associated with the cross country route.

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