

PROPOSAL	Request for Scoping Opinion - Installation of HVDC converter station	
LOCATION:	Land south and West of Lovedean Electricity Sub Station, Broadway Lane, Lovedean, Waterlooville	
REFERENCE NO:	██████████	PARISH:Horndean
APPLICANT:	WSP	
CONSULTATION EXPIRY DATE:	23 March 2018	
APPLICATION EXPIRY DATE:	29 March 2018	
COUNCILLOR(S):	██████████	
SUMMARY RECOMMENDATION: ENVIRONMENTAL IMPACT ASSESSMENT REQUIRED		

Site and Development

The development proposed for which a Scoping Opinion from this Authority is sought is part of a project proposing an Interconnector providing a High Voltage Direct Current (HVDC) power cable transmission link between France and England. The project has a nominal rating of 2,000MW intended to significantly increase cross-border capacity between the UK and France. The project would comprise HVDC subsea and underground cables, linking to converter stations in the UK and France; the converter stations would connect to existing sub-stations by underground High Voltage Alternating Current (HVAC) cables.

Within the East Hampshire District Council (EHDC) area, the project would comprise the underground HVDC and HVAC cables and the converter station. At this stage, the proposal includes reference to two converter stations as they are presented as options (referred to as Option A and Option B) and it is understood the applicants are currently undertaking work to finalise which of the options would be taken forward. Option A is within the EHDC area and option B is within the adjoining Winchester City Council area. This Scoping Opinion considers the likely impacts of the cable route and the converter station within the EHDC area.

The Council agrees that development does not constitute either Schedule 1 or Schedule 2 Development as set out in the Environmental Impact Assessment (EIA) but due to the environmental and human sensitivities in the area, the applicant is voluntarily proposing to submit an Environmental Statement with a subsequent planning application.

Option A is agricultural land in a generally open, rural landscape situated approximately 400m to the south of Lovedean electrical substation and approximately 300m west of Boundary Lane. The site is approximately 1.2km north west of Lovedean/Horndean and 1.6km north east of Denmead. The boundary of the South Downs National Park is approximately 500m to the north. Public footpaths run east-west along the southern and northern edges of the site. The boundary of East Hampshire and Winchester City Councils is to the immediate west of Option A. The area is within a Groundwater Source Protection Zone.

Option B is situated on agricultural land approximately 200m west of Lovedean electricity substation. The substation is contained by trees in the landscape, including Crabdens Copse, which is a small woodland and a designated Site of Importance for Nature Conservation.

Landscaping would be necessary around the perimeter of the site to integrate the development in the landscape and in view of the topography, some ground levelling works would be necessary. An optioneering exercise in respect of Options A and B is ongoing to determine the most environmentally suitable location for the converter station.

A new vehicular access would be necessary from either Broadway Lane or Old Mill Lane dependent upon which option is pursued. Once operational traffic would be limited to maintenance traffic only. Some ground levelling 'cut and fill' would be necessitated due to the topography of the site. Mitigation landscape planting would be provided to screen the building in the landscape.

Consultations and Town/Parish Council comments

EHDC Arboricultural Officer - See comments contained within the main body of this report.

EHDC Conservation Officer - See comments contained within the main body of this report.

EHDC Environmental Health, Pollution - See comments contained within the main body of this report.

EHDC Environmental Health, Contamination - See comments contained within the main body of this report.

EHDC Drainage Consultant - See comments contained within the main body of this report.

EHDC Landscape Officer - See comments contained within the main body of this report.

EHDC Planning Policy - No comments received.

HCC - County Archaeologist - See comments contained within the main body of this report.

HCC - Countryside Services - No comments received.

HCC - County Ecologist - See comments contained within the main body of this report.

HCC - Highways Officer - See comments contained within the main body of this report.

Natural England - See comments contained within the main body of this report.

Environment Agency - See comments contained within the main body of this report.

Historic England - See comments contained within the main body of this report.

Ministry of Defence - No comments received.

Civil Aviation Authority - No comments received.

Portsmouth Water - See comments contained within the main body of this report.

Crime Prevention Officer - No comments received.

South Downs National Park Authority - See comments contained within the main body of this report.

Royal Society for the Protection of Birds - No comments received.

Hampshire and Isle of Wight Wildlife Trust - See comments contained within the main body of this report.

Horndean Parish Council - The Environmental Impact Assessment should be a very extensive document bearing in mind the implications of the development. It is hoped that the statutory consultees identify any shortcomings in the proposed scope of the assessment. Matters of concern to residents include the following (but not by way of limitation) :-

Landscape concerns, noise and vibration, risk to water resources, heat generation at the site, light pollution, air quality, dealing with an emergency situation, access of emergency vehicles to and from the site, problems of construction and installation in a rural location like this, the effect on properties in the area, the impact of the installation of the cabling from Eastney to the site.

The Applicant should also pay close attention to the Local Plan under which the application will fall to be determined.

Scoping of the Environment Statement

Town And Country Planning (Environmental Impact Assessment) Regulations 2017 Scoping Opinion Request

The prime purpose of the scoping process is to achieve a consensus of opinion over potentially significant environmental impacts and the content of an Environmental Statement. The following sections expand upon some of the areas set out in the Scoping Report regarding the impacts that the Council feels should be covered in the Environmental Statement (ES).

This is the Scoping Opinion of East Hampshire District Council in respect of the Aquind Scoping Report (February 2018). In accordance with Regulation 15(4) of the EIA Regulations, the Council has consulted the above list of statutory (and non-statutory) consultees and their responses have been taken into account in adopting this Opinion. The Local Planning Authority is satisfied that the proposed scope for the EIA, as set out in 3.8 of the Scoping Report

encompass the appropriate various environmental impacts arising from the proposed development. The applicant's attention is drawn to the following general comments and detailed comments in respect of each topic area.

General comments

Planning policy

The Scoping Report identifies the relevant national and local planning policy and guidance framework against which a subsequent planning application will be considered. There should be analysis of the proposal against the relevant planning policies demonstrating how the proposal is policy compliant. The South Downs National Park Authority is progressing its Local Plan and submitted the 'Submission' version of the Local Plan at the end of April 2018. NB. a number of policies referred to in Appendix 3 within the East Hampshire Local Plan are not applicable as not all policies were not 'saved' by the introduction of the Joint Core Strategy. Policies CSWB2 and CSWB10 of the JCS are not applicable as they apply specifically to the development of the Whitehill Bordon new town.

Cumulative effects

The Assessment of Cumulative Effects (3.11) are noted. One scheme that should be included as part of a cumulative assessment in the ES is the energy storage system (our planning ref: 57524/001 and included at the top of table 3.4) now has planning permission. This will have implications for construction traffic and particularly on landscape impact, including landscape capacity. It will also likely have cumulative implications for amenity of nearby residents through noise, outlook, electric and magnetic fields, ecological impacts and ground water. Cumulative effects should also include the solar farm at Day Lane, Lovedean.

In addition to the schemes identified in Tables 3.4 and 3.6 and the development at land to the West of Waterlooville, the following existing developments should be included in the assessment of cumulative impact and form part of the baseline study.

- The existing Lovedean Electricity substation.
- The existing solar farm at Day Lane.

A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

The ES should include an impact assessment to identify, describe and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment, (subject to available information):

- a. existing completed projects;
- b. approved but uncompleted projects;
- c. ongoing activities;
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and

e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

The cumulative impacts section should also consider impacts on ecologically sensitive receptors such as designated sites, non-designated priority habitats and species, protected species etc. In relation to point (e), Natural England would advise that the Environmental Statement should also consider known forthcoming planning applications in close proximity to the development application, where there are potential impacts on key ecological interests.

For example, a scoping report has been submitted for the redevelopment of the Fraser Range site at Eastney, Portsmouth and a Coastal Defence scheme is being progressed for the Southsea frontage. All of these developments will potentially impact on the of this issue is necessary.

Design

It is understood that a hybrid application is proposed with details of the design of the converter building 'reserved' for detailed consideration at a later stage, but that details of scale will be included in the initial application. The absence of details of design make a full assessment of the impact on the landscape more difficult even where indications of scale are provided. It also makes an assessment of how the building/infrastructure would sit within the site and how any material arising from the development would be used to create new screening/landform's (as mentioned at 8.3.15). the absence of landscaping details also has the potential to undermine the Landscape and Visual Impact Assessment.

Consideration of alternatives

In accordance with Schedule 4 of the EIA Regulations, it is rightly stated that the ES will contain reference to alternatives. Reference is made (3.10.2) to a summary being provided in the ES of reasons for the selection of the final development design and a description of design alternatives. This is welcome, but it underplays the need for fully evidenced reasoning for site selection and reasonable alternative sites. It is understood that the Lovedean substation offers a technically available connection option in terms of a strategic location in the south of England, but the option sites as presented comprise generally open countryside on elevated ground in close proximity to the South Downs National Park and within a Groundwater Source Protection Zone. Evidence must be submitted demonstrating what alternative sites for the converter have been considered that may have a less sensitive impact on the environment, particularly on groundwater, landscape and visual impacts. This issue is particularly important in relation to the setting of the South Downs National Park.

It is understood a position close to the substation is required so as to reduce the length of DC cables between the converter and the substation (due to efficiency and trench requirements of DC cables), however, similar systems at Daedalus (Fareham) and the FAB Link at east Devon comprise much greater lengths of DC cables (approximately 5km in the case of the FAB Link)

and that raises the question of whether alternatives further south of Lovedean may be more suitable.

Mitigation measures

Various mitigation measures are referenced within the different topic areas, however, mitigation measures should not be developed in isolation as they may have implications for other topic areas. Mitigation should be clear and effective to 'avoid; reduce; compensate or enhance' and must be demonstrably deliverable and agreed with the relevant consultees.

Detailed topic areas

Traffic and Transport

As outlined in section 5 of the Scoping Report a Transport Assessment/Statement will be required to support an application with the main environmental impacts arising during the construction phase. Key routes to the proposed Lovedean site have been identified, although further details regarding the routes will need to be provided together with full details of construction traffic. The cable routing is shown and outlined in paragraph 5.1.6 this will need to be discussed with the Highway Authority in more detail. Information regarding cable laying proposals, carriageway widths are required and appropriateness of routes should be provided to support any application. Consideration must also be given to committed development in the area and measures taken to ensure service information and highway layout is up-to-date.

The Scoping Report appropriately sets out the areas in which the ES should consider impacts and it is noted that discussions are on-going with the County Highways Office in respect of potential mitigation and these should be developed and incorporated in the ES.

Air Quality

No further comments to add.

Noise and Vibration

The Scoping Report is considered to adequately address matters relating to noise and vibration impacts, which should be incorporated in the ES. Please note that noise and vibration implications should also be assessed in terms of ecologically sensitive receptors (see below) and should be scoped into the EIA.

Noise and vibration impacts must also be assessed in terms of implications on groundwater eg. increased turbidity of drinking water as the Groundwater Source Protection Zone feeds the Bedhampton Springs. See further comments on groundwater below.

Landscape and visual impacts

The Scoping Report correctly identifies the national, county level and local landscape character assessments and the main receptors are agreed. A detailed baseline needs to be carried out as part of the LVIA. This should be robust enough to enable it to guide constraints and opportunities for the site and steer the design and appropriate mitigation/enhancement approaches. The SDNPA recommend that the baseline study responds to the site's location close to the National Park boundary and clearly explores, using evidence, how the site contributes to the setting of the National Park, both in visual and landscape character terms. The inclusion of the South Downs Integrated Landscape Character Assessment (2011) is supported as part of the baseline evidence. Additionally, the following evidence should also be considered in order to inform the baseline assessment:

- Historic Evidence - maps, historic landscape characterisation (Hampshire Historic Landscape Characterisation 2013)
- South Downs National Park Viewshed Characterisation and Analysis (2015)
- South Downs National Park Tranquillity Study (2017)
- South Downs Green Infrastructure Framework

Table 8.1 sets out the issues to be scoped in / out of the LVIA. It proposes to scope out visual receptors beyond 3km of the site boundary, and this should be scoped in. It is noted work is still ongoing to determine the Zone of Theoretical Visibility (ZTV) and this should be used to inform receptor points that are beyond 3km but which may be sensitive to change. It is noted (8.3.5) that it is intended to include three sites beyond the 3km zone (Old Winchester Hill Downs, Windmill Hill and Ports Down Hill), however, there may be other locations that should be incorporated in the LVIA rather than being scoped out by a more arbitrary 3km zone. Winchester Hill is a Scheduled Ancient Monument with the South Downs Way National Trail crossing it, so should be assessed in that context.

The LVIA should not be limited to assessment of the building in isolation, but should, as identified (Para 8.2.3), include all associated elements (eg lighting columns, perimeter fencing, access roads, signage). As mentioned above, there is a conflict here with the suitability of an outline application to suitably assess detailed elements such as fencing, roads, parking areas associated infrastructure and landscaping proposals against any generalised reference to it in the LVIA.

The method used to assess the likely significance of effects needs to be set out within the LVIA.

The SDNPA recommend that the baseline study responds to the site's location close to the South Downs National Park boundary and clearly explores, using evidence, how the site contributes to the setting of the National Park, both in visual and landscape character terms. This will be a fundamental element of the Baseline Studies as it will help to determine the significance of any effects upon the National Park and its Purposes.

The development site is adjacent to and within the setting of the South Downs National Park, which is also designated as an International Dark Skies Reserve. Natural England's particular

interest is in people visiting / enjoying / experiencing the countryside and especially natural beauty / special qualities of the designated landscapes. This might include people using open access land, Natural Trails, the England Coast Path, promoted routes and other rights of way, as well as publicly accessible countryside and wildlife sites.

Consideration should be given to the direct and indirect effects upon this designated landscape and in particular the effect upon its purpose for designation within the environmental impact assessment, as well as the content of the relevant management plan for South Downs National Park. Detailed consideration of sequential effects should also be included and Natural England would also recommend the inclusion of long distance views from within the National Park where people are affected, such as Old Winchester Hill.

Natural England require details of local landscape character areas mapped at an appropriate scale to the site as well as any relevant management plans or strategies pertaining to the area. The ES should include assessments of visual effects on the surrounding area and landscape together with any physical effects of the development, such as changes in topography. The European Landscape Convention places a duty on Local Planning Authorities to consider the impacts of landscape when exercising their functions.

Natural England supports the publication *Guidelines for Landscape and Visual Impact Assessment*, produced by the Landscape Institute and the Institute of Environmental Assessment and Management in 2013 (3rd edition). The methodology set out in this document is almost universally used for Landscape and Visual Impact Assessments.

In order to foster high quality development that respects, maintains, or enhances, local landscape character and distinctiveness, Natural England encourages all new development to consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting local design characteristics and, wherever possible, using local materials. The ES should detail the measures to be taken to ensure the building design will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.

The method used to assess the likely significance of effects needs to be set out within the LVIA.

Lighting

As acknowledged in the Scoping Report, the South Downs National Park is a designated International Dark Skies Reserve. Reference is made to consideration of visual lighting impacts within the Landscape and Visual chapter of the scoping report. However, it is recommended that a lighting assessment is also scoped in to consider potential environmental pollution impacts. Lighting impacts should be assessed in accordance with best practise guidelines from the Institute of Lighting Professionals and should consider the operational phase of development. Consideration should also be given to temporary effects during construction for example, light pollution from flood lighting of the construction site. The lighting assessment should detail the baseline conditions, and consider the cumulative impact from any existing/approved developments.

Landscape Mitigation

The design and siting of the building must be landscape led. The need for landscape mitigation implies the development will have a visual impact on the surrounding area. Any mitigation is to be informed by a detailed assessment of the specific impacts of a development which should be designed and sited to limit any adverse visual impacts. Given the outline nature of the application there are concerns that the proposal will lack a genuine visual impact assessment to inform a landscape-led siting and design process.

Landscape mitigation proposals must be informed by an Ecologist to ensure the landscaping has mutual benefits to enhance biodiversity and improves wildlife connectivity and networks and foraging corridors. Mitigation must also be informed by the LVIA.

Heritage and Archaeology

The Council's Conservation Officer supports the approach taken to address above ground heritage. In line with the advice in the NPPF, the Environmental Statement should contain a thorough assessment of the likely effects which the proposed development might have upon those elements which contribute to the significance of heritage assets, including non-designated heritage assets.

The assessment should clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed. An arbitrary radial search is unlikely to accurately reflect the impact of the development on heritage assets in the wider area and a more tailored approach would be required, in particular with regards to assessing impacts to setting.

With regard to designated heritage assets, there needs to be an understanding of what makes these assets 'special, Significance can be harmed or lost through alteration or destruction of the heritage asset, or through development within its setting, so it needs to be demonstrated how these proposals would impact on significance.

The assessment should also take account of the potential impact which associated development activities (such as construction, servicing, and maintenance) might have upon perceptions, understanding, and appreciation of any heritage assets in the area. The assessment should also consider the likelihood of alterations to drainage and ground water patterns that might lead to in-situ decomposition or destruction of below ground archaeological remains and deposits, and can also lead to subsidence of buildings and monuments.

Archaeology

The County Archaeologist comments that the site is in an area of good archaeological interest with evidence of a Bronze Age cemetery and a round barrow in the immediate area together with isolated Iron Age and medieval finds recorded in the vicinity. It is confirmed that the archaeological Desk Based Assessment (DBA) should address the below ground archaeological potential of the site and the route of the cables. The DBA must set out (as

proposed by the submitted Scoping Report) the nature of the archaeological potential and the impact of the proposals on that potential as well as a mitigation strategy.

Ecology

The cable route option through Denmead Meadows has been identified for its nature conservation value and is currently being considered by Natural England for designation as a SSSI and detailed consideration of this will be required.

Species information should include a data search from the Hampshire Biodiversity Information Centre. Potential impacts of species to consider should include direct habitat loss, habitat fragmentation, population isolation, disturbance (light, noise, visual), and hydrological impacts. The scope of the ecological assessments currently underway are considered appropriate. Where the ecologist considers that the very rare Bechstein's bat may occur (the woodlands around the upper sections of the route are within the potential 'Bechstein's zone' in both East Hampshire and Winchester districts), bat surveys should be suitable for that species i.e. the species is not likely to be detected without trapping surveys. Whilst it is a woodland specialist, surveys in the area over many years have shown that important roosts are often situated well-away from woodland blocks and that key commuting routes and foraging habitat take bats across seemingly unsuitable habitat.

Hazel dormouse is highly likely to occur within hedgerows in the agricultural land within the area, and there is a recent record from woodland immediately adjacent to the Lovedean substation. Dormice may be persisting at low densities and therefore a negative result from a tube survey should be treated with appropriate caution.

Noise and vibration impacts on ecologically sensitive receptors are to be included in the ES.

Natural England advise that the ES be supported by a Biodiversity Mitigation and Enhancement Plan (BMEP) to include measures for mitigating impacts on protected species and habitats and include biodiversity compensation measures for residual biodiversity losses that cannot be mitigated on-site. This may include provision of off-site replacement habitats or a financial contribution for biodiversity improvements elsewhere. In the recent 25 Year Environment Plan, there is a drive to ensure net gains in biodiversity from development so the ES should demonstrate how the development will meet the duty set out in Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006.

Protected species

The scoping report sets out the protected species ecological surveys being undertaken as part of the EIA. The area in the vicinity of the Converter Station is sensitive with respect to Bechstein's bats and hazel dormouse. Detailed consideration of these issues within the EIA is required with mitigation strategies, as appropriate.

In terms of habitat impacts within the National Park, Catherington Down SSSI (calcareous grassland) is within 2Km of the site and also adjacent to one of the potential traffic routes.

Although the scoping report includes this within Table 10.3 (Nationally Designated Sites), it does not appear to be included within the Scope of Assessment (Section 10.2).

In the recent 25 Year Environment Plan, the Government has committed to making sure the existing requirements for net gain for biodiversity in national planning policy are strengthened and the current trend of biodiversity loss is halted. This approach is likely to be supported by the forthcoming planning policy guidance. Currently most developments still result in biodiversity loss. Natural England therefore advises that each development reverse this trend and deliver net gains in biodiversity.

Natural England strongly recommends that this proposal achieves a net gain for biodiversity and we advise that a biodiversity metric is used that would be relevant to each local authority. This approach would ensure that your authority will have met its duties under Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 which states that 'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.

Where residual biodiversity losses are considered unavoidable, Natural England recommends that further advice on these aspects is sought through our Discretionary Advice Service (DAS).

Arboriculture

An Arboricultural Implications Assessment would identify the impact of the development on existing trees and Crabdens Copse and identify suitable protection/mitigation. The ES should assess the implications for the cable routes between the converter station and Lovedean Substation in view of the trees that surround the Substation. Direct drilling should be used as opposed to works that may result in loss of any hedgerow/trees.

Socio-economics

No additional comments.

Water Resources and Flood Risk

The proposed technical approach is considered acceptable subject to the following comments being incorporated in the ES and catchment-specific characteristics are considered including concerns over increased turbidity, solution features, contamination pathways and impacts on groundwater. Specific comments from Portsmouth Water are detailed in light of the Groundwater Source Protection Zone. Comments are referenced using the Scoping Report's nomenclature for ease of reference.

Noise and Vibration

The noise and vibration assessment must include any anticipated vibration impacts on groundwater i.e. increased turbidity, on Portsmouth Water's supply. Vibrations caused during

development works must form part of this assessment to understand potential risks associated with turbidity.

Mitigation of vibration causing increased turbidity is challenging therefore it is best dealt with during the design phase.

Water Resources and Flood Risk

12.1.1 The study area should encompass ground and surface water features within at least 1000m when reviewing baseline conditions. There are potential impacts on groundwater abstractions due to solution features and rapid transit times between the proposed site and drinking water sources.

The proposed cable route has solution features present. These features contribute to a karstic environment with rapid transit times therefore pollution prevention is key. Consideration of the solution features must form part of the scope of work particularly in key areas i.e. close to the Lambeth Group and Chalk boundaries and Clay with Flints and Chalk boundaries.

12.1.37 The route of the cable lies on Superficial Geology overlying Bedrock and, in places, directly on Bedrock that is classified as Principal Aquifer. This must be reflected in the study along with karstic hydrogeology and solution features.

12.2.1 Surface-borne and subsurface pollutants should be considered in the study to account for legacy contamination derived from historic land use.

General Comments

2.2.6 The Source Protection Zones (SPZ) must be identified in any future reporting to ensure the appropriate level of risk is assigned to the risk assessments and design/operations.

2.5.5 Confirmation should be provided as to the proposed cooling options at the converter station, eg. do they involve the use of oils?

2.5.7 Details of temporary laydown areas will be required, the applicant should ensure these are low permeability and that pollution prevention measures are in place prior to use such as spill kits and incident management systems.

2.5.14 Details of Horizontal Directional Drilling (HDD) locations and methodology will be required for approval prior to commencement to understand the pollution prevention methodologies employed to mitigate potential impacts on groundwater. The potential land contamination risks must be addressed prior to commencement.

2.5.19 Construction details of the proposed joint bays should be provided for approval.

2.6.2 The specification and location of all oil filled cables, existing and proposed, should be provided to understand the potential risks posed to groundwater in the catchment.

2.7.2 Environment Surveys and Inspections must include consideration of soils, potential contamination, geology, superficial cover, bedrock, hydrogeology, solution features, source protection zones and nearby abstractions.

2.7.9 Details/method statement for trenchless techniques for the installation of cable ducts should be provided.

2.7.35 All imported soils material must be clean and inert and not pose a contaminant threat to the underlying aquifer.

2.9.1 The risk assessment must consider the risks posed to groundwater associated with leaving the cable in-situ at the end of the cable's 40 year design life.

Table 3.1 Hydrological Receptors - Effects of and on solution features, aquifer, water quality including turbidity must be included.

3.11.2 The assessment must be designed to understand the potential for pathway creation through impacted soils and/or long-term spill and incident management if preferential pathways are created.

3.13.3 Portsmouth Water would like to guarantee consultation via the LPA.

5.3.17 Traffic routes should be directed away from Source Protection Zones where feasible to reduce risk of collision and/or spills during construction and operation.

18.3.20 The preparation of a Construction Environmental Management Plan (CEMP) is supported.

Ground conditions / Contamination

Comments in respect of ground conditions should be read in conjunction with the above section on water resources.

13.1.1 The study must incorporate information on solution features and cavities due to potentially rapid transit times in the catchment posing a risk to Portsmouth Water's public drinking water supply.

13.1.2 The Ground Conditions chapter is proposed to include water quality therefore due the nature of the catchment being karstic in places the 250m study area is considered too narrow and should be extended to at least 500m.

13.1.14 The proposed route passes within SPZs for the Havant & Bedhampton Springs, the study must reflect this.

13.2.1 Sites of geological interest should include solution features.

13.2.6 The Conceptual Site Model (CSM) should also look at the development phase as well as legacy contamination and how mitigation measures can be deployed to prevent pollution occurring during the pre-development, during and operational phases. Table 13.1 - Where Secondary A Aquifers overlie Principal Aquifers this should have a receptor assessment of High due to the potential connectivity of the aquifer and the presence of solution features. Secondary A and B Aquifers should lie in Moderate Risk and it is recommended that Unproductive Strata is present in Low Risk.

13.3.15 Operational sources of contamination should consider new preferential pathways and, if relevant, Oil filled cables.

Appropriate attention is given to addressing potential contamination issues.

No further comments are made in respect of the remaining issues covered in the Scoping Report:

Carbon and Climate Change

Human Health

Soils and Land Use

Electric and Magnetic Fields

Waste and Material Resources

Conclusion

The Council has reviewed the topic areas and conclude that generally they adequately address the subject areas under which the development proposals may have significant environmental effects, subject to the above comments being addressed and incorporated into the EIA.

The following plans and specifications were considered when making the above decision:

Scoping report

1.1 - Site boundary

1.2 - Local Authority boundaries

3.1 - committed Developments

9.1 - Converter station options

9.2 - Designated Heritage Assets 1 of 3

9.3 - Designated Heritage Assets 2 of 3

9.4 - Designated Heritage Assets 3 of 3

Aerial photograph indicating trees

Aerial photograph indicating Crabdens Copse