

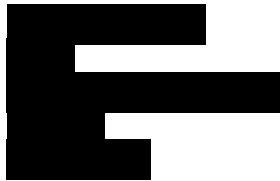


Havant
BOROUGH COUNCIL

Public Service Plaza
Civic Centre Road
Havant
Hampshire PO9 2AX

T 023 9247 4174
F 023 9248 0263

www.havant.gov.uk



Our Ref: GEN/18/00101
Direct Line: (023) 92 446263
Ask For: Mr L Oliver
Email: planning.development@havant.gov.uk

25 April 2018

Site Location: A3, Hambledon Road, Milton Road within Havant Borough Council
Re: Scoping Opinion for Aquind Interconnector Project for power transmission cable between England and France.

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 Havant Borough Council (HBC) administrative area, the proposal would comprise the cable route. The cable route for HVDC and fibre optic cables (hereafter referred to as the 'cable route') will run from the proposed converter station west of Lovedean, south to the landfall at Eastney, passing Waterlooville, Purbrook, Cosham, and east of the City of Portsmouth. It is outlined in the submission that where possible, the cable route will be located within the highway.

There will be four DC cables, laid as two separate pairs of cables (in most cases), with each cable pair located within a separate trench. Each trench will also include a separate duct to facilitate installation of fibre optic cables along the underground cable route. The submission outlines that these are essential for converter station control systems and communication. This proposal forms part of the wider project comprising the following components; HVDC subsea cables, Land/sea transition joint, HVDC underground cables, HVAC underground cables, located largely in Portsmouth City Council administrative area and supporting infrastructure in the form of HVDC converter stations in the UK, which are to be located in either Winchester City Council and/or East Hampshire District Council administrative areas (location to be determined at a later date). This Scoping Opinion considers the likely impacts of the cable route within the HBC area.

Scoping of the Environment Statement

The proposed scope for the Environmental Statement, as set out in 3.8 of the Scoping Report, is considered to be acceptable by the Local Planning Authority. Though further requests for information in the Environmental Statement are outlined in the relevant chapters below.

Cumulative effects

The Assessment of Cumulative Effects (3.11) are noted. The Grainger development has commenced with a number of phases under construction, and therefore this needs to be

updated with the relevant subsequent reserved matters application. This information can be found by contacting Katie Stickland - HBC/WCC -West of Waterlooville Implementation Officer - email: kstickland@winchester.gov.uk.

Traffic and Transport

Chapter 5 of the EIA scoping covers transport matters. Key routes to the proposed Lovedean site have been identified, although further details regarding the routes will need to be provided together with 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 regards cable laying proposals, carriageway widths 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.

As outlined in section 5 of the EIA a Transport Assessment/Statement will be required to support the application. The EIA sets out appropriately the areas in which the Transport Assessment should consider and engagement with the Highway Authority to inform this assessment is welcomed.

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).

Landscape and visual impacts

It is acknowledged that the cabling would have limited visual impact on Havant Borough Council. However consideration must be given to visual impact on viewpoints of the proposed convertor station sites, from within the boundaries of Havant Borough Council. 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.

It is noted on 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, this would cover the relevant sensitive viewpoints from within the boundaries of Havant Borough Council, for which the closest point to the boundary of the site is approximately 1.07km from the Borough boundary.

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 scope of works as set out in Chapter 10 of the submitted Scoping Report (Aquind, February 2018) are considered acceptable. The proposed cable route runs predominantly through urban/suburban areas and therefore ecological constraints are likely to be limited. There may be specific constraints resulting from impacts to e.g. trees, hedgerows or other habitat with potential to support protected species or which is otherwise of ecological value.

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.

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 structure for ease of reference.

Chapter 7 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.

Chapter 12 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.

Fisheries and Biodiversity

The Environment Agency have noted from the report that the cable route may cross an 'unnamed watercourse' north of the B2150. It is believed this water course to be the North Purbrook Stream, classified as a statutory watercourse. This watercourse is a known eel migratory route and is likely to have a resident fish population.

Currently the Scoping Report does not include potential effects on fish (including eels). The noise and vibration from HDD drilling activities near a watercourse, which has the potential for adverse impact on these fish species as well as other aquatic ecology such as water voles and otters. Therefore, this needs to be included in the EIA scoping report.

There are other watercourses close to the cable route including Soake Farm, the Wallington and Hermitage statutory main rivers. It is unclear from the maps provided whether these watercourses and their ecology could be impacted by the proposed cable route. Clarification needs to be given on how close the proposed route is to these watercourses whether the cable route will impact ecology of these rivers also.

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.

2.5.14 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.

Access and recreation

The EIA should consider potential impacts on access land, public open land, rights of way in the vicinity of the development. Appropriate mitigation measures should be incorporated for any adverse impacts. We also recommend reference to the relevant Right of Way Improvement Plans (ROWIP) to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

Hampshire County Council as Highway Authority for Public Rights of Way would like to make the applicant aware that there must be no surface alterations to the rights of way, nor any works carried out which could affect their surface, without first seeking the permission of this department. We welcome that the proposal includes the reinstatement of the land after the works have been completed. The specification of any repair works to the rights of way should be agreed in advance with this department and carried out to Countryside Service Design Standards. Advice is also given that the applicant seeks to minimise any disruption or risk to users of the rights of way throughout the construction period, such as through directing construction traffic away from public footpaths.

The applicant will need to apply for Temporary Closure Orders of the rights of way. We would expect suitable alternative routes to be provided throughout the temporary closure period, where possible. Further details on Closure Orders can be found here:

<http://www3.hants.gov.uk/row/making-changes/tempclosures.htm>

Drainage

Southern Water's (SW) current sewerage records shows that there are multiple public

sewerage infrastructure (minor and major) within the boundaries or the proposed works, please see attachments. The exact position of this public apparatus must be determined on site by the applicant. No excavation, mounding, new development/building works or tree planting should be carried out close to the existing sewers. Reference should be made to our guidance on standoff distances of the public apparatus:
<https://www.southernwater.co.uk/media/default/PDFs/stand-off-distances.pdf>

SW have also advised that any works within highway / access road will need to be agreed and approved by SW under NRSWA enquiry to protect public apparatus. It may be possible that also land located within Southern Water's ownership (Pumping Stations sites and Wastewater Treatment Works sites) may be affected by the above proposals. The developer is required to discuss the matter further with Southern Water.

Southern Water requires existing access arrangements to Waste Water Treatment Works and Pumping Stations sites to be maintained with regards to unhindered 24 hour / 7 days a week access. Southern Water operates a closed gate policy during maintenance works for Health and Safety reasons.

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.

Yours faithfully

Mr L Oliver
Principal Planning Officer
Planning Services
Havant Borough Council

Our Ref: GEN/18/00101
Attachements - Consultation responses