

# **Aquind Interconnector**

## **Local Impact Statement submitted by**

### **Winchester City Council**

#### **Executive Summary**

#### **Contents page**

- 1. Terms of Reference**
  - 1.1 Introduction
  - 1.2 Scope
  - 1.3 Elements of Scheme that fall within the WCC Area
  - 1.4 Description of Area
- 2. Statutory Development Plan**
- 3. Relevant Planning History**
- 4. Assessment of Impacts & Adequacy of Response**
  - 4.1 Placing Comments in Context
  - 4.2 Joint Working
  - 4.3 Overview of Impacts
  - 4.4 The Use of the Rochdale Envelope Approach
  - 4.5 Areas of Agreement
  - 4.6 Areas Requiring Additional Explanation or of Divergence**
    - 4.6.1 Re-affirmation of Funding Statement
    - 4.6.2 No UK start before approval of French side
    - 4.6.3 Clarification on Associated Development
    - 4.6.4 Consideration of Countryside route for the cable as alternative to A3
    - 4.6.5 Anmore Road cable Route Options
    - 4.6.6 Legacy Benefits
    - 4.6.7 Principle of Development
    - 4.6.8 Choice of Lovedean
    - 4.6.9 Micro siting options
    - 4.6.10 Building Design
    - 4.6.11 Ground Levels
    - 4.6.12 Landscape Impact
    - 4.6.13 Biodiversity Impacts
    - 4.6.14 Method of securing hedges & woodland features in surrounding landscape
    - 4.6.15 Traffic and highway implications
    - 4.6.16 Arboricultural Issues

- 4.6.17 Carbon Footprint
- 4.6.18 Socio Economic Issues

## 5. **Comments on draft Development Consent Order**

### **Appendices**

.....

## **1 Terms of Reference**

### **1.1 Introduction**

This report comprises the Local Impact Report (LIR) of Winchester City Council which is one of the 5 host authorities. The South Downs National Park is also an interested party.

In the preparation of this LIR, the Local Authority has had regard to the relevant guidance.

### **1.2 Scope**

This LIR will address the impacts affecting the administrative area of WCC. This excludes that section of the district which falls within the National Park.

### **1.3 Elements of scheme that fall within the Winchester City Council Area**

Those elements of the project that fall specifically within the Winchester district are:

- i. A section of the cable route at Maurepas roundabout.
- ii. A section of the cable route on Hambledon Road.
- iii. All of the cable route from Hambledon Road up to Lovedean.
- iv. The Converter Station.
- v. Part of the access roadway.

The wide range of elements listed above is reflected in the issues considered in this report.

### **1.4 Description of the Area**

As might be expected with a linear project, the character changes over

distance. The early part consists of a site focused on the highway passing through a built up area. It then passes into an open rural area of the Hambledon Road where the highway is flanked by hedgerows and trees. East of Denmead the cable route turns north through small fields defined by hedgerows.

The local community has a strong desire to retain the open gap between the village and Waterlooville. Hambledon Road is also an important communication corridor towards the A3 and M3. The road is an essential route for locals and commuters

North of Anmore Road the character changes as it enters an area with a more expansive landscape of large arable fields bounded by hedgerows. In the vicinity of the main site for the Converter Station the landscape still retains the above character but includes a number of wooded areas. The existing substation with its overhead lines is a major feature, but does not overwhelm the distinctly open countryside character

### **Statutory Development Plan**

The Planning and Compulsory Purchase Act 2004 section 38 (3) (b) (as amended) describes the development plan as the development plan documents which have been adopted or approved in relation to that area.

The relevant WCC development plan documents are:

- Winchester District Plan Part 1 Joint Core Strategy 2013 (LPP1)
- Winchester District Plan Part 2 Development Management and Sites 2017 (LPP2)

### **Supplementary Planning Guidance**

Denmead Neighbourhood Plan (2011-2031) 2015.

Policy 1: A Spatial Plan for the Parish supports the retention of the open gap between Denmead and Waterlooville

### **West Waterlooville Development Area**

The West Waterlooville Development Area is a strategic grow area.

### **Overall Approach Adopted by the Council**

The council acknowledges that NSIP proposals are assessed in the context of a higher level of policy considerations. If the scheme is considered sound at a national level, the Council is seeking the least impact/harm on all aspects of the local environment and on the local community, with some legacy benefit.

### **3 Relevant planning history**

The only recorded planning application relating to land within the Order limits is an extension to the Lovedean substation approved 6 August 2013.

## **4 Assessment of Impacts and Adequacy of Response**

### **4.1 Placing Comments in Context**

This statement develops the 17 issues contained in the WCC representation of February 2020

### **4.2 Joint Working**

The Council is engaged in an ongoing dialogue with the applicant to seek to clarify and resolve matters.

These comments are based on the application as submitted.

### **4.3 Overview on Impacts**

The proposals within the district relate to two elements. Firstly, the Converter Station and secondly, sections of the cable. The impacts fall on both the natural environment and on the local community

### **4.4 The Use of the Rochdale Envelope Approach**

The Council understands and accepts the basic principles behind the operation of the Rochdale Envelope.

The Council is questioning whether it is appropriate for this to be applied throughout the entire scheme.

The Council considers there are two areas where the Rochdale Envelope is being applied too liberally and further information is essential. These are:

- i. Cable laying in Hambledon Road and the exiting into the land to the north.
- ii. Onshore biodiversity impacts between Hambledon Road and Anmore Road.

### **4.5 Areas where there is Agreement**

4.5.1 Subject to further discussion on the requirements there is general agreement on the following topics:

- Archaeology
- Heritage assets

- Environmental Protection

#### **4.6 Areas requiring Additional Explanation or Divergence**

The Council wishes to raise a number of matters that are considered important in the context of delivering the scheme.

##### **4.6.1 Re-affirmation of Funding Statement**

Following recent turmoil on the financial markets, the applicant is invited to update the financial statement.

##### **4.6.2 Request for No Start in UK until French side Approved**

When considering the bilateral nature of this project, the French half of the scheme should be ready to be implemented before work starts on any part of the scheme on the UK side. This should form part of any DCO.

##### **4.6.3 Clarification on Associated Development**

The Council note the definition of “associated development” and its relationship to the principle development.

The Fibre Optic Cable (FOC) and telecommunications building will be a commercial element. This has raised a number of questioned which need answering before a view can be expressed if this is truly associated development.

##### **4.6.4 Consideration of a Cross Country Route as an Alternative to the A3**

The applicant does not appear to have considered the merits of the countryside route in comparison to the road route. These merits have grown over the past 12 months as concerns over working in the highway have grown. If the countryside option was possible, then such a route would remove all those concerns associated with using the A3 and B2150.

##### **4.6.5 Anmore Road Cable Route Options**

Anmore Road is the only location where an alternative for the cable route is under consideration. The option of the Denmead Meadow HDD extending to emerge in the farmland beyond Anmore Road is the Councils first preference.

Two route options are offered. Either both cable circuits will run straight across the road (western option) or one circuit would be diverted and turn eastward onto Anmore Road before turning north. A TPO tree lies in the centre of the western route.

The retention of the TPO tree is a fundamental requirement in the choice of any option. The Council favours the western option providing it is wide

enough to take both circuits and protect the tree. This situation needs clarifying.

#### **4.6.6 Legacy benefits**

The Council considers that in view of the long terms presence of the building, the applicant should be reaching out to the local community to share with them a level of the benefits that will accrue from the operation of the Converter Station. In July 2018 the secretary of state noted that the proposal has the same characteristics as a generating facility. The proposal is canvassed as low carbon. If you consider these two characteristics together then the closest comparison is a wind farm. The government supports this type of community benefit. The applicant is invited to adopt the same approach.

#### **4.6.7 Principle of Development**

The development plans do not contain any detailed policies that anticipate the proposal now under consideration. It does not fit into any of the exemptions categories in the adopted policies. The scale and magnitude of the proposal is such that it would not comply with the local development framework. The general presumption in favour of development in the National Planning Policy Framework (NPPF) is noted.

In this instance the balancing exercise regarding the national need rests with the Secretary of State as the guidance states in Advice note 1.

Assuming the case can be made for Lovedean, then the choice of the western location relative to the substation is on balance, as good as it could be in terms of minimising impact. That is not to imply there is no impact from this location but a pragmatic view of the least worst option.

#### **4.6.8 The choice of Lovedean over other possible connection points to the grid.**

The Council does not see within the submission the audit trail that justifies Lovedean as the grid connection point and the role the National Park played in that decision. This detail is necessary to ensure that the proposal complies with EN-1.

#### **4.6.9 The positioning of the Converter Station relative to the Existing Sub Station (the micro siting question)**

The application is putting two options (B(i) & B(ii)) forward. The difference between them means that an existing hedgerow may or may not be retained. The Council favours option (B(ii)) (hedgerow retention) as having the least impacts. Given the magnitude of the impacts associated with option B(i) the

Council would have severe concerns based on landscape and biodiversity impacts.

#### **4.6.10 Building Design**

The size and scale of the proposed Converter Station means that it is simply not possible to fully screen it within the wider environment. This means considering what measures from design, through to colour and appearance can be applied to ensure it blends into the landscape. For a number of technical and impact reasons, the design of a landmark signature building is not appropriate. Attention has turned to the desire for a dark/drab finish.

#### **4.6.11 Ground Levels**

The degree to which the presence of the Converter Station can be mitigated within the wider landscape includes the degree to which it can be sunk into the ground. WCC is asking for sight of the background discussions that limited the proposed level of excavations.

#### **4.6.12 Landscape Impact**

Whilst accepting that the landscape impact assessment and the level of landscaping, there are a number of outstanding questions that need resolving to ensure the landscape impact is contained as far as possible. The nature and scale of the proposed building is such that sections of it will always be visible in the surrounding area. It is essential that the landscape screening envelope is as extensive as it can be, that its management includes addressing diseased trees and that its retention and management is secured in the long term. The Council is not persuaded that the initial set of Requirements meet these objectives.

#### **4.6.13 Biodiversity**

At the present time the formal submission is lacking in detail regarding the existing baseline, habitat to be lost, replacement habitat created and what element of this is enhancement. Additional actions at Lovedean should address an apparent weakness in east – west connectivity.

Regarding the two SINC's, in view of the environmental sensitivities associated with this land, a greater amount of detail is necessary on the establishment of the two compounds, associated works and reinstatement. The justification for forming an access and laying two trenches across a section of the designed SINC at the northern end needs justification.

#### **4.6.14 The Method of Securing Hedgerow and Woodland Features in the Surrounding Landscape to the Converter Station**

There are concerns that the screen features that the landscape assessment is relying upon to soften or mitigate against the presence of the Converter Station cannot be relied upon to be retained. This concern also applies to the delivery and long term retention of the new planting. Without confidence in the proposed mechanism to achieve these objectives (a deed of covenant) there is a risk that the conclusions of the landscape assessment cannot be delivered. This will result in the building being opened up to extensive views in the surrounding landscape. Such a degree of exposure would be unacceptable.

The time period that any management agreement covers must be included and that should be in perpetuity.

#### **4.6.15 Traffic and Highway Implication**

The cable circuits are shown in no greater level of detail than conformation they will be confined to within the Order Limits. The Hambledon Road has a distinctly different character to other roads affected by the cable installation. It is considered to provide a more challenging environment to lay the cable circuits within. The final location of the cable circuits and their installation will be up to the contractor. This approach is not consider to offer the level of confidence that is required. Additional survey work should be undertaken to confirm that the installation is feasible whilst maintaining at least a single flow of two-way traffic.

#### **4.6.16 Arboricultural issues**

The application lacks sufficiently clear and precise detail on the impact that will result on hedgerows and trees from cable installation and vehicle access formation. Greater clarity leading to a reduction in the Order limits should result that will enable features to be removed from risk of harm.

Trees cannot be planted within 5m of the cable route. Even those section of replacement hedgerow will take years to make the same level of contribution to local character. The applicant should mitigate for that loss of character and biodiversity value by additional planting elsewhere.

#### **4.6.17 Carbon Footprint**

The application excludes carbon emissions from construction employee's vehicles. Despite carbon mitigation measures, a significant residual amount remains. This should be mitigated by further actions. The applicant is invited to offer evidence why they consider that over the life of the interconnector, low carbon energy will be imported.

#### **4.6.18 Socio Economic Issue**



The proposal states that the local community will benefit in terms of accommodation and daily spend by workers and the wider area with job opportunities. The degree of spending which Denmead will benefit from is questioned as contractors are likely to be discouraged from passing through the village. Although offering to support local employment and businesses, the applicant is not offering any formal actions. The Council wishes to see this covered by a Requirement.

**Comments on the draft Development Consent Order**

The Council is seeking clarification and revisions to the contents of the DCO and stands ready to actively engage in that process.