

Dated: 6 October 2020

Aquind Interconnector

Local Impact Statement submitted by

Winchester City Council

Summary (attached as a separate document)

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1 Terms of Reference

1.1 Introduction

1.1.1 This report comprises the Local Impact Report (LIR) of Winchester City Council which shall be referred to throughout this report as WCC or the Council. Winchester is one of the 5 host authorities (Portsmouth, Havant, East Hampshire, Winchester and Hampshire County Council) whose administrative areas will accommodate elements of the Aquind project. The South Downs National Park boundary lies in close proximity to the northern end of the application site and as such they are also registered as an interested party.

1.1.2 In the preparation of this LIR, the Local Authority has had regard to the purpose of LIRs as set out in Section 60(3) of the Planning Act 2008 (as amended), DCLGs Guidance for the Examination of Applications for Development Consent and the Planning Inspectorates Advice Note one (Local Impact Reports).

1.2 Scope

1.2.1 This LIR will address the impacts of the proposed development as they affect the administrative area of WCC for which the council exercises control under the town and country planning act. This excludes that section of the district which falls within the designated South Downs National Park (SDNP). Attached as appendix A is a copy of a plan identify the boundary between the two authorities. Within the SDNP, the responsibility for the administration of planning matters rests with the National Park Authority. For the avoidance of any doubt, none of the physical development under consideration would take place within the National Park.

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

1.3.1 The application relates to the establishment of a cross channel interconnector. On the UK side, this will take the form of a linear project that stretches from Eastney on Portsea Island up to Lovedean where the national grid has a high voltage substation. The intention is to make landfall at Eastney, with the high voltage direct current cables then laid under the road network up and off Portsea island, up the A3 to Waterlooville and then on Hambledon Road (B2150) towards Denmead. Generally, the two cable circuits will be buried within the highway limits. On the eastern side of Denmead, the route would turn north, across open countryside to Lovedean where it is intended to construct a Converter Station which will change the

power from direct current (DC) to alternating current (AC) and reverses (depending on whether power is being imported or exported). The final short leg will make the AC connection to the national grid system via the existing substation.

1.3.2 Those elements that fall specifically within the Winchester district are:

- i. A small section of the cable route in the vicinity of the Maurepas roundabout in Waterlooville.
- ii. A section of the cable route on Hambledon Road (B2150).
- iii. All of the cable route northward from Hambledon Road up to Lovedean.
- iv. The main site for the Converter Station. This consists of the proposed building compound, the telecommunication building and the vast majority of all the associated earthworks and landscaping. The existing substation is also shown within the site. The western part of the substation lies within the WCC area.
- v. A section of the access roadway approximately 740m in length. The first 350m of the roadway including the access off Broadway Lane lies within the East Hampshire District area.

The wide range of elements listed above is reflected in the extensive range of issues set out in the core section of this report on which the Council wishes to comment.

1.3.3 Appendix A also shows the position of the boundary between Winchester City Council and East Hampshire District Council at Lovedean. The applicants drawing Figure 6.10.1 entitled Outline Landscape and Biodiversity Strategy Management Plan (APP-506) shows the district boundary and sets the context of items 4 & 5 above.

1.4 **Description of the Area**

1.4.1 The following is a brief description and outline of the character of the 5 areas referred to above. The limit is naturally defined by the extent of the red line that forms the extent of the Development Consent Order.

Maurepas Roundabout

1.4.2 The Maurepas roundabout represents an outlier of the district. The district boundary does not follow any feature on the ground, presumably reflecting some historic boundary which is now over ridden by the footprint of current day development and the modern road system. Attached as appendix B is a plan showing the district boundary in this area. It encompasses a short

section of the A3 dual carriageway to the south and east. Hambledon Road which here is a dual carriageway, runs off to the north. Houghton Avenue runs off to the west providing access into the West Waterlooville Development Area. The character here is urban. The DCO boundary follows the A3 up to the roundabout and then follows Hambledon Road. The DCO appears to follow the highway limits on the eastern side, but after following the edge of a footpath on the southwest side of the roundabout, it then follows an undefined boundary across Houghton Avenue and then on the Hambledon Road before running out of the district. Zooming in on Sheet 2.4 of the Work plans (APP-010) allows a close inspection of the DCO limits in this area.

Hambledon Road

- 1.4.3 For a distance of some 1.35km, the DCO lies within the Havant District area. This section sees the road reduce from a dual carriageway to a single lane shortly after the Milton Road roundabout. The road is flanked to the south by the new development area and on the northern side by continuous residential development which fronts Southdown View, a service road running parallel to Hambledon Road.
- 1.4.4 The Winchester district is entered once passed the last house (No 14) on the north side and past the Darnel Road junction on the south side. Attached as appendix C is a plan showing the position of the district boundary on Hambledon Road. As it passes through the district, the character of this section of Hambledon road is that of a busy single carriageway rural road. It is generally flanked on the northern side by the continuous presence of a dual use footpath/cyclepath with a verge on the south side. The highway limits tend to be defined by hedgerows with trees. Of particular note is the presence of trees within the hedgerows including the notable single tree west of the Soake Road junction and the group of trees flanking the road west of the Soake Road junction. This group, with trees on both sides of the road, is located east of the pumping station that lies on the south side of the road. There are scattered properties along the road including the business park at the Soake Road junction. Soake Road runs northward serving two clusters of properties one at the southern end and the other at the northern end at Anmore. The strong hedgerows and particularly the trees make a very important statement about the character of the road and contribute to the break in development between Waterlooville and Denmead that is locally referred to as the Gap.
- 1.4.5 As it enters the district, the DCO limits along this section of the route take in a short section of the mouth of Darnel Road on the south side and then follow the highway limits through to the Closewood Road junction. On the north side, the DCO leaves Havant with the boundary following the northern

edge of Southdown View and it continues westward to include the car parking area at the end of the service road before returning to the hedge on the northern side of Hambledon Road. The DCO limit continues across the frontage of the residential properties and the business park through to the Soake Road junction. To the west of this junction, one arm of the DCO boundary strikes northward. On the south side to the west of Closewood Road, the second arm of the DCO boundary takes in a strip of ground from the fields that run alongside the Hambledon Road. The DCO then broadens for a short section before returning to the Hambledon Road taking in a triangular section of a field. The outer southern edge of the DCO appears to follow a notional boundary as it crosses these fields. From this point on the south side of Hambledon Road, the DCO strikes off across the Hambledon Road. This general change on direction reflects the point where the route turns north. The edge of the western boundary of the DCO on the north side of Hambledon Road can be fixed using the location of the sewage pump station on the south side of the road as a reference point.

Hambledon Road to Lovedean

- 1.4.6 This corridor crosses open countryside for a distance of some 2.8km. There is a distinct difference in the use and character of the land as the route moves from south to north. This change in character is recognised in the Winchester District Landscape Character Assessment (March 2004) where the Anmore Road area is used as the dividing point between the Hambledon Downs LCA to the north and the Forest of Bere Lowlands LCA to the south.. This point will be used below to divide the route up into two sections south and north of Anmore Road. To the south of Anmore Road, the character is of tightly knit grazing fields divided by hedges with a use reflecting its location off the eastern edge of the village. North of the Anmore Road, the land use character is distinctly that of open farmland with large fields defined by hedgerows but relatively few east west features.
- 1.4.7 The land between Hambledon Road and Anmore Road is divided up into a series of grass fields predominantly used for grazing. This appears to be used by horses/ponies reflecting the close proximity to Denmead which lie only a short distance to the west. The general fall in ground levels is northeast to southwest, again evident through the drainage features in this area. Kings pond adjacent to Anmore Road is a distinctive local feature and feeds the drainage channels that run south. There is no public access or footpath across this land. The majority of the land between Hambledon Road and Anmore Road is designated as a Site of Importance for Nature Conservation (SINC). Attach as appendix D is a copy of a plan showing the extent of the areas designated as a SINC.

- 1.4.8 In this section of the route the extent of the DCO boundaries are shown on sheet 3 of the Land Plans (APP-008). At the northern end, the proposed working area moves eastward from touching the rear of the residential properties off Marples Drive to lying behind the properties that form part of Clifton Crescent. An area of ground that runs up to Soake Road is also included as part of the DCO area.
- 1.4.9 The submitted plan shows several options for entering the land on the north side of the Anmore Road. The red line which defines the limits of the DCO offers two options. Either both cable circuits will run straight across the Anmore Road utilising the 50m gap between Kings Cottage and Lavender House, or one of the circuits would turn eastward onto Anmore Road for a distance of some 120 metres before turning north opposite Clifton Crescent, utilising a 20m wide section of the 60m gap between residential property boundaries on this side of the road. A TPO tree lies in the centre of the western gap between Kings Cottage and Lavender House. Whilst there is a hedge on the western side of this tree, the field boundary on the eastern side is made up of a wooden palette fence.
- 1.4.10 North of Anmore Road, the route merges back into a single but very broad corridor, it continues northward across arable farmland behind a number of properties off Edneys Lane and then uses the lane itself as the western boundary, before again skirting around several residential properties and then narrowing as it passes the rear of Denmead Farm. The unnamed lane marks the boundary beyond which the route continues to climb gradually entering the Lovedean area. This area appears to have seen the removal of some hedgerows resulting in the creation of large fields with an open exposed character. The land falls gently to the south.

Lovedean

- 1.4.11 The DCO area at Lovedean is confined within the four lanes that form a box around the site. The actual DCO shows an irregular outlined application area. It consists of a large central core area that includes the exiting substation and a large area of open farmland to the west. A broad strip of land wraps around the southern side of the substation back to Broadway Lane. This section on the south side of the substation is dissected by the district boundary. Land Plan sheet 1 of 10 (APP-008) shows this boundary. In the south west corner, the DCO limit reached out to the boundaries of Old Mill Lane and the unnamed lane. There are a multiple number of "outliers" as the Order reaches out to include woodland areas and hedgerows on the boundaries of Old Mill Lane, Broadway lane and the unnamed lane to the south. To the north, the DCO limits do not reach the edge of the road. A wooded area consisting of Crabdens Copse runs along the southern edge of the substation to its SW corner and then merges into Stoneacre Copse

which strikes off to the SW as a peninsular feature. Neither of these two features are part of the DCO limits. The central core area is presently open agricultural land crossed by overhead pylons radiating out from the Lovedean substation which is a major land use. The substation consists of open plant with limited buildings.

- 1.4.12 The ground falls gently from north to south. The fields are divided by hedgerows with some reinforced by sections of woodland. The field boundaries appear to offer weaker links east-west than north-south. To the north, just beyond any part of the red lined site is a single footpath (Monarchs Way) running from the NW to the SE.
- 1.4.13 There are a limited number of residential properties in this area. Several lie on the eastern side of Old Mill Lane and others on the northern side of the unnamed lane to the south. There are small clusters of properties off Broadway Lane. The closest lie south of the proposed access point and off Old Mill Lane.
- 1.4.14 Views from public vantage points towards the proposed Converter Station site are limited from Broadway Lane and for a large part tend to include the substation. The tall hedgerow on the eastern side of Old Mill Lane completely screen views towards the Converter station site from that direction. The importance of the Old Mill Lane hedge acting as a screen is revealed on the occasions when the hedgerow is absent at field entrances. These gaps offer open views towards the land to be occupied by the converter station. Attached as appendix E is a photograph from one of these gaps in this screen that is located just south of The Haven.
- 1.4.15 Notwithstanding the presence of the existing substation the general feel and character of the area around Old Mill Lane is distinctly rural open countryside.

Conclusion

- 1.4.16 As might be expected with a linear site, the character changes over distance. The early part consists of a site focused on the highway as it passes through a built up area flanked by development. It then passes into an open section of Hambledon Road where the highway is flanked by hedgerows and trees. Here, it has a distinctly rural character. On the eastern edge 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 to the east.

The Hambledon Road is an important communication corridor for the communities of Denmead, Hambledon and those in the south Meon Valley.

Essentially, it is the only practical route towards the A3 and M3 corridor which offer links to the Southampton/Portsmouth/Chichester area to the south or northward towards Guilford and London. Local knowledge indicates that this road is used as part of a diversion route when problems occur on the M27/A27. The road is essential for commuters, the movement of freight, for students accessing the schools in the Waterlooville area and generally for local businesses and people shopping. The absence of any easily useable alternative is a critical consideration.

1.4.17 North of Anmore Road the character of the site changes as it enters an area with a more expansive landscape consisting of larger arable fields. These are still bounded by strong hedgerows with trees but the east-west hedgerows offer weaker links. Some hedgerows have been removed. 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 that form part of the pattern of hedgerow links but which can also appear as more isolated features. The existing substation with its associated network of overhead lines is a major feature in the area but is not so dominant to override the distinct open countryside character. This is particularly true on the western side along Old Mill Lane.

2. Statutory Development Plan

2.1 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.

2.2 The relevant documents that comprise the development plan which have been adopted or approved in relation to the WCC area are identified below.

- Winchester District Plan Part 1 Joint Core Strategy adopted March 2013 (hereafter referred to as LPP1)
- Winchester District Plan Part 2 Development Management and Sites Allocations adopted April 2017 (hereafter referred to as LPP2)

2.3 In the section below (Assessment of Impacts and Adequacy of Response) in responding to the details of the application a brief summary of a policy follows its heading. Full extracts of the relevant policies are attached as appendix F to this report.

Supplementary Planning Guidance

2.4 Denmead Neighbourhood Plan (2011-2031) “made” 1 April 2015. The Denmead Neighbourhood Plan, along with Local Plan Part 1 adopted in March 2013 and the National Planning Policy Framework will be used to determine planning applications in the area covered by the Neighbourhood Plan.

Policy 1: A Spatial Plan for the Parish. The Neighbourhood Plan defines the Denmead Settlement Policy Boundary on the Proposals Map. Development proposals located inside the Boundary will be supported, provided they accord with the other provisions of the Neighbourhood Plan and the Winchester Development Plan. Development proposals outside of the Denmead Settlement Policy Boundary will be required to conform to development plan policies in respect of the control of development in the countryside. The Neighbourhood Plan defines the Settlement Gap between Denmead and Waterlooville on the Proposals Map for the purpose of applying development plan policy to prevent the coalescence of the settlements.

Paragraph 4.4 also says the following:

.....It also seeks to protect the essential countryside character of the defined settlement gap between Denmead and Waterlooville to the east of the village (in Policy CP18 of LPP1)

4.13 Finally, the policy reasserts the definition of the important Settlement Gap between Denmead and Waterlooville (as provided for by Policy CP18 of LPP1). A new assessment of the precise definition of the policy boundary and of the key features of the Gap has been undertaken by the Steering Group to evidence the DNP (and is included in the evidence base at Annex A). Attached as appendix G are extracts from Annex A relating to the Gap.

West Waterlooville Development Area

2.5 The West Waterlooville Development Area has been identified as a strategic grow area in the Councils local plan. This is a joint initiative with Havant BC. The allocation is to create a sustainable urban extension to Waterlooville consisting of about 3000 dwellings together with support facilities which is to include 23ha of employment land. The allocation is expected to deliver until 2024/25. The extent of the allocated area is show on map 6 in the LPP1. A copy of the plan and policy SH2 are attached as appendix H.

Overall Approach Adopted by the Council

The council acknowledges that NSIP proposals are assessed in the context of a higher level of policy considerations than those which would focus at the district level. In that context, the councils approach to its engagement with the applicant and with the Examining Authority is that if the scheme is found to be

sound and to be supported, then it should be undertaken with the least impact/harm on all aspects of the local environment and on the local community. It should also offer some legacy benefit for the local residents who will have to live with the physical presence of the building for the duration of its life. As part of that approach, the council will consider the proposal against the adopted local planning policy framework.

3 Relevant planning history

- 3.1 The only recorded planning application relating to land within the defined Development Consent Order area is an extension to the Lovedean substation planning application reference number 13/01025/FUL. This was approved 6 August 2013.

4 Assessment of Impacts and Adequacy of Response

4.1 Placing Comments in Context

- 4.1.1 In the relevant representation submitted by Winchester City Council dated 19 February 2020 (RR-198) a series of 17 main issues were identified by the Council. This statement develops those outstanding issues together with additional considerations that have emerged since that date.

4.2 Joint Working

- 4.2.1 The Council has entered into the spirit of the guidance relating to NSIPs and undertaken a commitment to engage with the applicant to seek to clarify and resolve matters where possible. Meetings and discussions have been held with the applicant during the pre-application stage and also since the application was submitted. In the pre application stage these consisted of several joint meetings with all the authorities followed by a number of teleconferences. A smaller design group consisting of the applicant, East Hampshire, the National Park Authority and the Council has also met. As the name implies, this group focused on the Converter Station building. Following the PEIR consultation exercise, the applicant has met the Council on a number of occasions to discuss a range of issues. Some of the later meetings did involve the lead members of the Council. Since the application was submitted and taking advantage of the delay resulting from the Covid19 lockdown, the dialogue has continued through email exchanges and through online meetings.
- 4.2.2 Continuous engagement should reduce the gap between the two parties and progress is being made in certain areas. The delay to the commencement of the Examination Stage offered a longer than normal period for discussions to take place. That engagement continues. To date, the applicant has not formally changed or amended the original application. Accordingly, the

Council feels obliged to base this LIR on an assessment of the application that was submitted on 14 November 2019. Where engagement has/is taking place and change is anticipated, this will be acknowledged in the conclusions.

4.3 Overview on Impacts

- 4.3.1 The proposal in so far as it impacts on the Councils area relates to two elements. These are firstly, the Converter Station at Lovedean and secondly, sections of cable route. The impacts will fall on both the natural environment and on the local community. The nature, degree and duration of the impacts are considered to reflect the different elements that make up the proposal. A clear and simple distinction can be drawn between those parts of the proposal where the impact is associated with the construction phase and that part of the scheme where the impacts will also have a longer lasting impact due to the loss of some natural feature or the physical presence of a building or associated structure.
- 4.3.2 During the construction phase, there will be widespread impacts as the cable is installed and as the converter station is established. Where the cable route follows the road the main impacts will be on road users and on the immediate environment as hedgerows and trees are at risk of removal. As the cable route turns off the road to follow a countryside route, the main impacts will be on the natural environment. At Lovedean the changes to the natural environment will be dramatic in terms of loss of habitat, changes to ground levels and changes to landscape. The local community will bear any issues associated from disruption from construction traffic.
- 4.3.3 Excluding those sections of vegetation removed as part of the cable installation, the main impacts associated with the operational phase will arise from the permanent presence of the Converter Station. The local community will bear the impacts associated with the presence of the development. During the operational stage the surrounding natural environment will continue to show the changes together with the presence of the new buildings for the life of the operational phase. New planting will mature during the operational stage, but it seems inevitable that for a building of this size there will always be certain locations when parts of it will be visible.
- 4.3.4 Whilst the section of the cable route on the rest of the Hambledon Road and down the A3 both lie outside the district, any proposals that may impact on the free passage of traffic on those roads will have a direct impact on residents of the district who use those roads. Accordingly, it is requested that this impact on residents of the district is noted and taken into consideration when assessing the aspects of this proposal.

4.4 The Use of the Rochdale Envelope Approach

4.4.1 The Council notes, understands and accepts the basic principles behind the operation of what is generally referred to as the Rochdale Envelope. These principles are set out in detail in Advice Note number 9. The approach is established on two cases and the key propositions set out in paragraph two are noted. These are:

- The assessment has to apply the worst case approach.
- The level of information required should be sufficient to enable the main or likely significant effects to be assessed together with any mitigation measures described.
- The need for flexibility should not be abused and it is within the power of the determining body to decide whether level of detail is sufficient and it can seek more detail if required.

4.4.2 The applicant has adopted the Rochdale Envelope principles within the application. However, the Council is questioning whether it is appropriate for this approach to be applied throughout the entire scheme. The Council believes that there are circumstances where this approach is not appropriate and a higher level of clarity and detail is required. The applicant has already accepted the need for a more detailed approach in the consideration of the Converter Station when they established the design group and has put forward a number of guiding principles. This is in recognition of the environmental sensitivities of the impact on the landscape and the proximity to the National Park.

4.4.3 The Council considers that there are two specific areas where the Rochdale Envelope is being applied too liberally and that further information is essential for a reasonable assessment of the application to be undertaken. These are:

- i. In the consideration of the cable laying in Hambledon Road and the means of exiting the road into the land to the north.
- ii. In the onshore biodiversity proposals and specifically in the section between Hambledon Road and Anmore Road where part of the installation will be by HDD and part trenching up through the Kings Pond Meadow SINC and then across the Anmore Road

The full details of why the Council considers that further information is required will be outlined in the relevant sections of this statement that deal with the above areas.

4.5 **Areas where there is Agreement**

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

- Archaeology (comments of Archaeology Officer attached as appendix I)
- Heritage assets (comments of Historic Environment Officer attached as appendix J)
- Environmental Protection (comments of the Chartered Environmental Health Practitioner are attached as appendix K)
- Assuming the case can be made for the choice of Lovedean, then it is the view of WCC that considering the range of potential locations for the position of the Converter Station relative to the substation, the choice of the western location is on balance as good as it could be in terms of minimising the impact.

4.6 Areas requiring Additional Explanation or Divergence

Based on reading the application details, the Council wishes to raise a number of matters that are considered important in the context of delivering a justifiable scheme if the DCO is granted.

4.6.1 Re-affirmation of Funding Statement

The requirement for the applicant to provide a certain level of financial information is note (APP-023). This gives an outline of how the capital for the project will be raised. The need for this information is assumed to be for the applicant to either show they have sufficient resources themselves to undertake the project, or a reasonably robust plan to raise the capital. Following the recent turmoil on the financial markets, the question arises if the original plan to raise the capital remains sound? Accordingly, the applicant is invited to update the financial statement on this aspect of the scheme.

4.6.2 Request for No Start in UK until French side Approved

4.2.1 The Council is conscious that the UK side is only half of the overall project and for it to function requires the approval and construction of the other half on the French side. The progress in getting that part of the scheme approved and in a position to be implemented is unclear at the present time. When considering the bilateral nature of this project, it seems sensible to ensure that the French half of the scheme has approval and is ready to be implemented before work starts on any part of the scheme on the UK side. This avoids the potential situation of work commencing here, without the other half of the project getting consent. This concern applies to both the cable installation and the construction of the buildings. At worst, any cable installation would result in the identified impacts being experienced by the local communities..

Relating to the Converter Station, this might result in the Council being faced with a proposal to seek some alternative use for a building that would owe its presence to a totally different set of circumstances and have only gained approval based on a unique nationally proven need.

4.6.3 Clarification on Associated Development

4.6.3.1 The Council has reviewed the guidance which defines the scope of “associated development” and which outlines its relationship to the principle development.

4.6.3.2 It had originally been understood that the fibre optic cables (FOC) and the telecommunication building were needed to communicate between the two converter stations and to monitor the performance of the cable. This was stated in the Consultation Document section 2.3.1 dated February 2019. However the formal application has revealed that the FOC will now contain a commercial element. This commercial use also applies to the Telecommunication building. This is made clear in the interpretations at the start of the dDCO which say that the telecommunications building will be a commercial use of the fibre optic cable (APP-019). This has raised a number of questions which need clarification before a view can then be expressed, whether or not, these elements of the proposal do genuinely fall within the accepted definition of associated development.

4.6.3.3 In the view of the Council, the missing information relates to the following:

- Whether the FOC is larger to accommodate the commercial use.
- What percentage of the capacity of the cable is to be dedicated to commercial use as opposed to any use directly supporting the interconnector link.
- Does the trench size need to be larger to accommodate the commercial FOC.
- Confirmation that the telecommunications building is indeed related solely to the commercial use of the FOC.
- What contribution if any does the commercial uses of the FOC play in the financing of the overall project?
- Could this commercial telecommunications element (FOC and associated building) that sit within the overall project, be implemented on its own without the principle elements of the scheme being built?

4.6.3.4 In addition to the above questions, the Council feels that the applicant also needs to address and respond to the following related question:

- The proposal would make provision of a commercial FOC link between Lovedean and France via Portsmouth. There is no indication of how the end of the FOC at Lovedean (or at some intervening point) would then be connected to the wider UK telecommunication system. This may require additional equipment that requires planning consent in its own right. Any such application would have to be considered by the relevant local planning authority against its planning policy framework. The fact there would already have been a significant commitment and installation of infrastructure would inevitably be a consideration that would force its way into the determination of any planning application. It is difficult to believe that the onward link has not already been considered. Accordingly, the Council wishes to know how the FOC would be connected to the wider telecommunications network. It is considered legitimate to seek this detail, which it is believed, would also help clarify the associated development issue.

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

- 4.6.4.1 At the Preliminary Meeting, submissions were made on the merits of considering a route for the cable circuits across the open countryside to the west of the A3. It was agreed that this aspect should form part of the Examination. The paper submitted by the council by Procedural Deadline B (PDB-006) addressed the merits of the matter forming part of the examination process and did not consider the concept of the alternative route in any greater detail. That is the purpose of the following section of this report which should be assessed in the context of the paper already submitted. When commenting on the cable route in the following section, the Council makes no judgement on the merits of Eastney as a landfall point.
- 4.6.4.2 From the evidence trail submitted, it is clear that Aquind have only considered in any detail the option of running the cable circuits up the public road network. If there is a need for a cable to reach Lovedean, then the Council must question why any other option beyond the A3 and B2150 Hambledon Road has not been considered for the section from Portsdown Hill to Denmead.
- 4.6.4.3 A simple view of a map of the area shows that a route running from Portsdown Hill northward up through the open countryside to the eastern side of Denmead, or one that follows a short section of the A3 and then runs off to the NNW through the countryside, are potential alternatives to the full road route. These are shown on the sketch plan attached as appendix L. To ensure this was not an entirely fruitless exercise, the Council has undertaken a preliminary desk top review of the environmental constraints of the countryside option. Two jump off points have been considered for the purpose of that exercise but there may be others. The first is from Portsdown

Hill Road west of the A3. The second is from part way up the A3 in the vicinity of Milk Lane.

- 4.6.4.4 Regarding the first jump off point, the review started at the southern end as it was recognised that if a jump off point could not be identified then this was a non starter. The Council has sought the views of Portsmouth City Council (PCC) as highway authority on the issue of the cable route continuing westward on Portsdown Hill Road, to a point where it could then strike off northward into the countryside. PCC did not raise any immediate fundamental issue with that option.
- 4.6.4.5 The study has considered two routes which are annotated on the attached plan as route A and route D. Route A avoids any SINC or ancient woodland and runs parallel to the over head pylon line. Where it runs through the West Waterloo Development Area (WWDA) it would utilise what is intended to be open space. Route B is a slight deviation, avoiding the WWDA and move further away from the overhead route. By contrast route D avoids the WWDA completely. However, it would need to negotiate two designated woodlands. This could be achieved by horizontal drilling. The second jump off point part way up the A3 is identified as route C on the plan. This route runs west and could join route A, or it could continue across the southern edge of the woodland and joint route D.
- 4.6.4.5 The conclusion of the preliminary desk top study is that the countryside route has merit and deserves a more thorough examination and comparative assessment against the road route. The Council notes that the examination of an alternative to the road route has the support of a number of other interested parties including Hampshire County Council, Havant BC and Newlands Parish Council.
- 4.6.4.6 The difficulties of the countryside route are not underestimated and clearly a balance sheet needs to be created to review the benefits and dis-benefits of one option in comparison to another. As note in the paper submitted at the Preliminary Meeting, the assessment of the positive and negative aspects of both options may not be a simple matter. The impacts associated with a country route will be screwed towards environmental factors whilst those impacts associated with the road option will fall on the local communities and road users. At the present time, the choice of the road route appears to be imposing all the dis-benefits on the local communities, road users and indeed the wider society.
- 4.6.4.7 The applicant has been aware of the Councils concern over this matter for over 18 months. It was raised in the PEIR response in April 2019. A copy of the response is attached as appendix M. In a meeting with the Aquind representatives in June 2019 when the councils PEIR responses was

examined in detail, Aquind stated that they had considered the countryside option at a very early stage but rejected it due to the environmental constraints. The Council responded by questioning how any meaningful assessment could have been undertaken when the constraints associated with the road option were only becoming apparent as the scheme was developing in 2019? The Council highlighted that the absence of a realistic consideration of the countryside option could potentially be a fundamental flaw in any submission. Accordingly, it advised Aquind to discuss this matter with PINS during one of their contact meetings. At a subsequent meeting between the Council and Aquind in August 2019, it was reported that the matter was not discussed with PINS and that Aquind were confident in how they had dealt with it. The Council noted this position and said they would continue to work with Aquind but reserved the right to raise it at the Examination Stage. The record of the notes from the June 2019 meeting accompanied the Council's first response regarding the Preliminary Meeting (PDA-005).

Conclusion

4.6.4.8 Other than to respond directly to the questions raised at the PEIR Consultation stage, the applicant does not appear to have considered in any detail the merits of the countryside route in comparison to the road route. It is considered that the merits of the need to assess the countryside option have grown over the past 12 months, as concerns over the practicalities of laying two circuits in the highway have grown. The Council has specific questions over the practicalities of laying the cables in Hambledon Road which is a single carriageway and the impacts that would result. These are documented elsewhere in this report. Appendix 22.1A Framework Traffic Management Strategy (APP-449) would seem to indicate the potential to meet some form of delay between Denmead and Waterlooville as a result of the cable installation works to be a period of 46 weeks in total. If the countryside option was possible, then such a route would remove all those concerns associated with using the A3 and B2150. The latter road would only need to be crossed which would have a much shorter impact.

4.6.5 Anmore Road Cable Route Options

4.6.5.1 There is only one location within the district where an alternative for the cable route is under consideration. Work Plan sheet 3 of 12 (APP-010) shows two options for entering the land on the north side of the Anmore Road. The merits of these alternatives will be considered below. As a general observation, the option of the Denmead Meadow HDD continuing below the Kings Pond SINC and emerging in the farmland on the north side of the Anmore Road would be the Council's first preference as that resolves a number of issues.

4.6.5.2 The reason why the cable route might divide at Anmore Road is not clearly understood. Two options are shown on the plans. Either both cable circuits will run straight across Anmore Road (the western option) utilising the gap between Kings Cottage and Lavender House or one circuit would be diverted and turn eastward onto Anmore Road for a distance of some 120 metres before turning north opposite Clifton Crescent. The eastern cable would utilise a small section of the 60m gap between residential properties on this side of the road and head northward. A TPO tree lies in the centre of the western gap between Kings Cottage and Lavender House. Whilst there is a hedge on the roadside boundary to the western side of this tree, the field boundary on the eastern side is made up of a wooden palette fence. Regarding the eastern gap opposite Clifton Crescent, this is made up of a hedgerow which is well established although exhibiting some gaps.

4.6.5.3 In Appendix 22.1A Framework Traffic Management Strategy (APP-449) when considering the amount of time Anmore Road needs to be closed to accommodate any work (5.2.1.1) it suggests the options for the cable here are:

- Both circuits straight across (western option) 2 days road closure for both circuits.
- One circuit straight across, the other following a section of Anmore Road (eastern option). Up to 4 weeks road closure.

4.6.5.4 The position of the Council is that the retention of the TPO tree is a fundamental requirement in the choice of any option. The gap occupied by the pallet fencing does appear to offer an opportunity for both circuits to enter the land on the north side of Anmore Road without impacting on any natural feature. The gap looks adequate providing care is taken in the choice of the work area, the size and type of machinery used and with the protection of the root protection area of the tree. One complicating factors appears to be the statement on Application document reference 2.5 Access and Rights of Way Plans Sheet 2 of 10 (APP-011) which proposes an access is formed into the western gap off Anmore Road ref AC/2/a. There is a concern that there is insufficient space for an access and the 2 circuits to enter the land whilst protecting the integrity of the TPO tree. The situation is then confused by the statement in Appendix 22.2 Framework Construction Traffic Management Plan (APP-450) section 3.4.3.1 which implies that construction traffic for the Anmore section of the cable installation will travel down the internal haul road from Lovedean. If this statement is correct, the need for an access off Anmore Road into this land is unclear.

4.6.5.5 The eastern option on Anmore Road is not supported from both the perspective of unnecessary disturbance to residents by a prolonged road

closure and because it would result in the removal of an as yet undefined section of the hedge to allow the single cable circuit through and again to form an access (AC/2/c) This route may also have an implication on the approach route the cable takes at the top of Kings Pond Meadow which could increase the potential impact on the SINC and the roadside hedge.

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 supporting this position the Council notes that the proposal has the same characteristics as a generating facility. This is considered to be the main reason why the Secretary of State issued the Section 35 Direction dated 30 July 2018 which allow the project to be considered as a Nationally Significant Infrastructure Project (AS-039). The first reason in the annex to that direction refers to the project as “similar in terms of electricity capacity to a generating station”. Furthermore, the proposal is canvassed as a scheme that will result in low carbon electricity. If you consider the two aspects of a generation facility that produces low carbon power then the Council would suggest the closest comparison is a wind farm.

The Council notes the support by government for this type of community benefit which is set out in the DECC publication Community Benefits from Onshore Wind Developments: Best Practice Guidance for England. The applicant is invited to adopt the same approach as outlined in this publication and work with the Council on the agreement and establishment of a community benefit fund.

This publication is conscious of the need to avoid any suggestion that a consent may somehow be bought. Applicants are therefore invited to participate in this arrangement. The Council hope that the applicant will engage in discussions in the same spirit.

The Council has already undertaken some preliminary considerations into this matter and is confident that rapid progress could be made towards a satisfactory agreement established through a planning obligation (section 106 agreement).

4.6.7 Principle of Development

The development plans set out in section 2 above does not contain any detailed policies that anticipate the proposed development now under consideration. LPP1 general policy DS1 (Development Strategy and Principles) does acknowledge the general presumption in favour of

development. LPP1 policy MTRA4 (Development in Open Countryside) does list types of development that could be permitted within the open countryside. Category one refers to “development which has an operational need for a countryside location”, it goes on to refer to agriculture, horticulture and forestry.

This proposal does not fit into any of the exemptions categories of development that are anticipated in the policies outlined above. The scale and magnitude of the proposal is such that it would not comply with the local development framework. It is however, acknowledged that policies cannot anticipate the full range of developments that may come forward. The general presumption in favour of development referred to 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:

...”There is, however, no need for the local authority to undertake an assessment of compliance with an NPS; this would duplicate the Examining Authority’s role”....

Whether the Council objects to the proposal will be dependent on the assessment and responses to the consideration of the factors identified below. At the present time in the absence of the level of detail considered appropriate, the Council is not in a position to offer a definitive position.

Assuming the case can be made for the choice of Lovedean, then it is the view of WCC that considering the range of potential locations for the position of the Converter Station, 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.

Issue

The Council does not see within the submission the audit trail that justifies the assessment process which identified Lovedean as the grid connection point and the role the proximity of the site to the National Park played in that decision.

Application Details

Chapter 2 of the Environmental Statement (APP-117) sets out the optioneering process followed by the applicant which has resulted in Lovedean being identified as the connection point to the grid. This exercise

is outlined in section 2.4. Section 2.4.2.13 says that the final choice of Lovedean as the connection point “was determined by National Grid”.

Planning Policy Context

LPP1

Policy DS1 (Development Strategy and Principles) Notes the presumption in favour of sustainable development and that development should demonstrate conformity with a series of principles including maintaining and enhancing the importance of environmental heritage and landscape assets.

MTRA4 (Development in the Countryside) After listing certain types of development that could be permitted in the open countryside, notes that development should not cause harm to character and landscape.

LPP2

DM17 (Site Development Principles) supports development that does not have unacceptable effects on amongst other criteria, ecosystems or landscape character.

DM23 (Rural Character) requires that development within the countryside should not have any unacceptable impact on the rural character of the area.

Commentary

The applicant has stated that the choice of Lovedean as the connection point was given to them by the National Grid. (Section 2.4.2.13). This followed a site selection process that saw Lovedean reviewed against two other locations Chrickerill and Bramley. There is limited information on the assessment that was undertaken on the relative merits for or against each of these sites in section 2.4. What is not clear from the assessment details that are available is the degree to which the presence of the National Park featured in that assessment.

EN-1 in paragraph 5.9.12 which considers development outside a NP, makes it clear the importance of protecting a National Park. It is the view of the Council that the applicant should present in more detail the evidence base that resulted in the choice of Lovedean.

The Council has sought this information since making reference to it in the PEIR response letter of 29 April 2019. To date, Aquind have not provided any response and the question remains unanswered. It has been suggested that the information may be in confidential correspondence. However, selective redaction may release the sufficient detail to answer the question

Conclusion

As submitted, the application does not contain information on the weight given to the sites proximity to the National Park when the decision was made

to choose Lovedean as the connection point to the grid. This detail is necessary to ensure that the proposal complies with the requirement set out in EN-1. Furthermore, without this detail there remains unanswered questions over the weight that should be given to the protective local plan policies in the context of national considerations.

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

Issue

The application is putting two options forward for the position of the converter station relative to the existing substation. These are known as options B(i) and B(ii). The difference between them means that an existing hedgerow may or may not be retained. WCC would be severely concerned if the option B(i) was chosen that resulted in the loss of the hedgerow.

Application Details

The application is currently asking for two options for the siting of the converter station compound to be considered. These are referred to as micro siting options B(i) and B(ii). Option B(i) would result in the loss of the north-south hedgerow. Option B(ii) would see the compound moved some 35m to the east that would allow the hedgerow to be retained. They are shown on the Indicative Converter Station Area Layout Plans sheets 2 & 3 respectively (APP-013). The applicant has presented the worst case option in the submission of (Bi). The final decision rests on the successful negotiations with the National Grid and whether they are willing to allow the release of the space need to move the compound over.

Planning Policy Context

LPP1

Policy DS1 (Development Strategy and Principles) Notes the presumption in favour of sustainable development and that development should demonstrate conformity with a series of principles including maintaining and enhancing the importance of environmental heritage and landscape assets.

MTRA4 (Development in the Countryside) After listing certain types of development that could be permitted in the open countryside notes that development should not cause harm to character and landscape.

CP13 (High Quality Design) The core principle of this policy seeks the highest standard of design and seeks all development to demonstrate they have considered 5 criteria, one of which is that the development enhances the natural environment and improves local biodiversity

CP16 (Biodiversity) seeks to maintain, protect and enhance biodiversity, delivering net gain across the district. It states that where unavoidable impacts occur, they should be appropriately mitigated. Proposals should clearly outweigh the harm to habitat and/or species.

LPP2

DM15 (Local Distinctiveness) promotes the conservation or enhancement of trees and hedgerows that contribute to local distinctiveness.

DM17 (Site Development Principles) supports development that does not have unacceptable effects on amongst other criteria, ecosystems or landscape character.

DM23 (Rural Character) requires that development within the countryside should not have any unacceptable impact on the rural character of the area.

Commentary

During the PEIR consultation exercise the applicant put toward what is now referred to as option B(i) for the siting of the Converter Station. Responding to concerns raised by the Council relating to the loss of the significant section of hedgerow this option required, the applicant has brought forward what is now referred to as option B(ii). This would see the general position of the Converter Station moved some 35m eastward closer to the existing substation. This adjustment to the siting of the Converter Station would enable the retention of the hedgerow. It is understood that this move does require a successful negotiation with the National Grid.

If option B(i) is approved and construction, it would have a number of negative consequences from both a landscape and biodiversity aspect. The following hedgerows would be affected:

- The lower half of hedgerow HR05
- All of HR08
- The eastern part of HR06

This adds up to approximately 410m of species rich hedgerow and 25m of hedgerow will be lost (16.6.1.13). This includes some mature trees. This will also result in the loss of its biodiversity value including the loss of habitat for bats (section 16.6.1.27). It has also been recognised that two badger setts will also be destroyed (section 16.6.1.21). This action would weaken the landscape screen on the western side of the development removing the existing mature screen. This will be replaced by new planting as shown on Figure 6.10.1 Outline Landscape and Biodiversity Strategy Management Plan (APP-506). The new planting will obviously take time to mature into a

condition that would provide the equivalent screening value and ecological value that the existing feature does.

If micro siting option B(ii) is adopted all the above negative aspects would be removed with only the east west hedgerow HR07 being removed.

Confirmation is required to ensure that any new landscaping proposals are not watered down if the hedge is retained.

Conclusion

The Council favours option (B(ii) as having the least impacts on natural features and habitat. Given the magnitude of the impacts associated with the implementation of option B(i) the Council would have severe concerns based on the landscape and biodiversity impacts as set out above. It is hoped the negotiations with the Grid can be successfully concluded.

4.6.10 Building Design

Issue

In the view of the Council, the size and scale of the proposed Converter Station means that it is simply not possible to fully screen it within the wider environment. Accepting that principle means considering what measures from design through to colour and appearance can be applied to ensure it blends into the surrounding landscape as much as possible.

Application Details

The Design and Access Statement sets out the process that has been followed and the level of consultation involved in the evolution of the position and design of the Converter Station.

Whilst adopting the Rochdale Envelope principle, the application does offer maximum parameters for the Converter Station. These are set out in Table WN2 that would form part of Requirement 5 (Converter station & optical regeneration station parameters). Within the Design and Access Statement (APP-114) a series of building design principles are set out relating to the proposed Converter Station. These are:

1. External cladding and roofing to the buildings will be pre-coated metal, or equivalent durable low-maintenance material.
2. The wall cladding be comprised of narrow vertical elements of varied colours to break up the mass of the building.
3. Colours will be selected from a palette of autumnal colours within the ranges below chosen to complement the surrounding landscape.

RAL 1013 -1015; 8001- 8015; 8023 – 80281 Colour grading across the building from dark to light will be considered to relate to adjoining land usage and visual impacts, including the Monarch's Way long distance footpath to the north of the site. The roofing will be in a dark recessive non-reflective colour to minimise visual impact.

4. Building massing will be designed to rationalise the different functions required and avoid visual clutter which could result from different sized buildings scattered across the site.
5. The Converter Station will be orientated on an east-west axis with the HVDC cables entering the Valve Hall to the western side of the site, the Valve Hall and buildings of up to 26m in height being located to the western side of the site and the outdoor infrastructure, up to 15m in height, to the eastern side. The HVAC cables exit the Converter Station site on the eastern boundary travelling towards Lovedean Substation further to the east.
6. Curved corners will be included, where practicable, to soften the visual impact and attention will be applied to relationships between the component parts of the main structures to add interest and further reduce the perceived mass of the building.
7. Lightning masts of up to 30m in height, will be needed and could be attached to the Converter buildings and/or located within the compound defined on the Parameter Plans.
8. Heating and ventilation air conditioning will be located within the buildings or at ground level within the defined building site plan. There will be no plant on the roofs of the highest buildings.
9. Operational noise from the Converter Station will meet the criteria detailed in Chapter 24 Noise and Vibration (Section 24.4.5 and Appendix 24.6).
10. The Converter Station will not be illuminated other than in circumstances such as upon activation of an intruder alarm or maintenance or repair operations.

Requirements 5 and 6 are intended to agree the final details.

Planning Policy Context

LPP1

MTRA4 (Development in the Countryside) After listing certain types of development that could be permitted in the open countryside notes that development should not cause harm to character and landscape.

CP13 (High Quality Design) The core principle of this policy seeks the highest standard of design and that all development demonstrates they have

considered 5 criteria, including an analysis of how the proposal relates to its surroundings and through the design process how it incorporates measures to minimise carbon emissions, promotes renewable energy and reduces its impact on climate change.

LPP2

DM17 (Site Development Principles) supports development that does not have unacceptable effects on amongst other criteria, ecosystems or landscape character.

DM23 (Rural Character) requires that development within the countryside should not have any unacceptable impact on the rural character of the area.

Commentary

The importance of the issue of the design and appearance of the building emerged at an early stage in discussions with the applicant. This factor is not simply because of the sensitivity of the proposed location in the open countryside but also its potential impact on the National Park which lies to the west, north and east. The importance of this issue encouraged the applicant to establish a joint design working party of the three interested LPAs (WCC, East Hampshire & SDNP) together with the applicant. The applicant did at a very early stage at these meetings establish tight technical constraints in terms of the need for a building of a certain size with specific operational requirements and which was also resistant to fire. Whilst these were obviously important factors to consider, it is felt that the technical issues have played a dominant role in the outcome of the design.

The Council did consider the merits of proposing a building with more architectural interest but this was not followed through for two principle reasons. Firstly, any attempt to add interest to the building would undoubtedly result in a taller building and that was felt to increase its impact. Secondly, the fact the public cannot get very close to the building means that any detail that may be added to the building to make it more interesting would not be visible.

Attached as appendix N and appendix O are the comments of both the Landscape officer and the Urban Design officer who have been involved in the discussions. On balance, the position of the Council is that the emphasis should be on ensuring that the building blends into the surrounding landscape with the choice of a material finish that is dark in colour. The concept of having a slatted finish with curved corners that provides some shadow and tone is considered to have merit. The elevations are considered to be viewed with different backgrounds and so the potential for a slight variation to the colour between the elevations is considered worth exploring. These issues are still under active consideration by the Design Group.

Subject to the above matters being resolved and incorporated in the submission, the Council does accept the Building Design Principles as set out in section 6.2.2 of the Design and Access Statement (APP-114).

Conclusion

For a number of technical and impact reasons, the potential for a design of a landmark signature building is not considered suitable for this location. The Council's focus has turned to the desire for a finish that blends in with the surrounding landscape and a dark/drab colour solution is being explored within the design group. This exercise should be pursued to seek a consensus rather than leaving the matter up to a requirement. Once resolved, the amended principles should then be referenced in Requirement 6.

4.6.11 Ground Levels

Issue

The degree to which the presence of the Converter Station can be mitigated within the wider landscape is a function of several factors. One of these factors is the degree to which it can be sunk into the ground. Reducing the overall height of any building where practical, is therefore considered to be an important issue that justifies being explored.

Application Details

The site for the converter station is on ground that is sloping from north to south with a variation in ground level over that distance of some 10m. The plans as submitted show a building that has a FFL of 81.5m AOD. This is to be achieved by adopting a cut and fill approach using excavated material from the northern part and placing this in the southern areas to raise the ground level.

Planning Policy Context

Relevant policies are those seeking to reduce visual impact

LPP1

MTRA4 (Development in the Countryside) After listing certain types of development that could be permitted in the open countryside notes that development should not cause harm to character and landscape.

LPP2

DM17 (Site Development Principles) supports development that does not have unacceptable effects on amongst other criteria, ecosystems or landscape character.

DM23 (Rural Character) requires that development within the countryside should not have any unacceptable impact on the rural character of the area.

Commentary

The degree to which the presence of the Converter Station can be mitigated within the general environment is a function of several factors. One of these factors is the finished floor level within the building. The lower this level can be set, the more the building would sit within the landscape. With the land falling from north to south the application indicates an intention to form a level platform on which to build by using the cut and fill technique.

One advantage of sinking the building as far into the ground as possible is that it would reduce the change in level that the access road will have to negotiate as it swings northward under the overhead pylon lines and then has to climb as it approaches the compound entrance.

The Council is aware of the ground water sensitivities and that the applicant has been in conversation with Portsmouth Water and the Environment Agency. However, to date the application does not contain the paper trail that shows that the 85.1AOD level is the lowest that can be achieved for the above reason, or any other technical consideration.

It is acknowledged that there would be additional technical considerations to digging deeper into the surrounding ground, including the stability of the banks, the ability to dispose of surface water and the possible need to dispose of surplus spoil. However, to date no reason other than the apparent one to achieve a "balance" of excavated against fill material requirements appears to have been considered.

The proposal as submitted does contain conflicting information on the point from which the height of the building will be calculated. The Interpretations to the Requirements Schedule 2 1 (6) (b) says the height of the building will be taken from existing ground level. The building parameter plan (doc 2.6) options contains the following note: HEIGHTS INDICATED ARE HEIGHTS ABOVE FINISHED GROUND FLOOR SLAB LEVEL (+85.100 AOD) IN COMPLIANCE WITH FLOOD RISK ASSESSMENT REQUIREMENT (+300mm ABOVE FINISHED (IE TOP OF GRAVEL CHIPPING) CONVERTER STATION SITE LEVEL (+84.800 AOD)).

It is evident that these two approaches cannot be correct. It is considered that the building parameter plan reflects the correct position as the Council understands it. Accordingly, the Interpretations section needs to be corrected.

Conclusion

Since April 2019 WCC has been seeking clarification why the 81.5m AOD

figure was adopted. In response, Aquind have indicated that this was fixed in recognition of the need to protect the Aquifer. WCC has asked for sight of the background discussions with the Environment Agency and Portsmouth Water that support this approach. To date they have not been forthcoming. It is hoped that this evidence will be presented during the examination.

The lack of the evidence base for the 81.5m AOD figure raises a question whether the excavation could in fact go deeper, setting the building into the ground to a greater degree. At the present time this matter remains unresolved between the two parties.

4.6.12 Landcape Impacts

Issue

Whilst accepting the general approach to the landscape impact assessment and the level of landscaping proposed at Lovedean, there are a number of outstanding questions that need resolving to ensure the landscape impact is contained as far as possible.

Application Details

Chapter 15 Landscape and Visual Amenity (APP-130) sets out the degree of physical changes and ranks the potential impact on the surrounding area particularly with regard to the study areas that has been identified. The assessment of impact is undertaken from the comparison of the situation today, immediately after the development takes place and then after 20 years. The comparison tables 15.2 & 15.3 indicate that planting undertaken close to the site would be more effective at screening the development but the overall level of success is low. This accords with the view expressed in section 15.5.3.79 which says significant effect are likely to be concentrated within the 3km study area. The intention is to mitigate against impact through embedded actions

Planning Policy Context

LPP1

Policy DS1 (Development Strategy and Principles) Notes the presumption in favour of sustainable development and that development should demonstrate conformity with a series of principles including maintaining and enhancing the importance of environmental heritage and landscape assets.

MTRA4 (Development in the Countryside) After listing certain types of development that could be permitted in the open countryside notes that development should not cause harm to character and landscape.

CP13 (High Quality Design) The core principle of this policy seeks the highest standard of design and seeks all development to demonstrate they have considered 5 criteria, one of which is that the development enhances the natural environment and improves local biodiversity

CP16 (Biodiversity) seeks to maintain, protect and enhance biodiversity, delivering net gain across the district. It states that where unavoidable impacts occur, they should be appropriately mitigated. Proposals should clearly outweigh the harm to habitat and/or species.

LPP2

DM15 (Local Distinctiveness) promotes the conservation or enhancement of trees and hedgerows that contribute to local distinctiveness.

DM17 (site Development Principles) supports development that does not have unacceptable effects on amongst other criteria, ecosystems or landscape character.

DM23 (Rural Character) requires that development within the countryside should not have any unacceptable impact on the rural character of the area.

Commentary

The proposal needs to be considered at several levels in terms of the role landscape impact plays. Firstly, on the position of the Converter Station relative to the substation and secondly, on the degree of landscape impact that will arise from the Converter Station in the location as proposed. There are planning policy considerations at both of levels and where relevant they will be identified in the assessment below.

The Council has accepted the general methodology and identification of the key receptors. The Landscape Officers views are attached as appendix N.

Regarding the first issue on the general position of the converter station, the position has been taken that assuming the case can be made for the choice of Lovedean, it is the view of WCC that considering the range of potential locations for the position if the Converter Station, the choice of the western location is on balance as good as it could be in terms of minimising landscape impact.

Concerning the closer detail of the landscaping proposed the Council has several points to raise. At Lovedean on Old Mill Road there is an unexplained section of the eastern boundary (due west of the Converter Station) where the roadside hedge does not appear to have been included as part of the DCO limits. It is understood that the precise nature of the roadside feature needs clarifying and following that, its inclusion or a reason

why it is not included as part of the DCO is put forward. It is believed that this work is currently underway.

Clarification is also required that in the event of micro siting option B(ii) being adopted that the applicant will not rein back from the extent of the landscaping proposed on this side of the development

One developing concern is the prevalence of ash dieback which carries the risk of hollowing out existing wooded areas and hedgerows. To combat this, any landscape management requirement should also include the ability to replace not just dead or dying new plants but the managed removal and replacement (with suitable native species) of any ash trees within the proposed landscape scheme that suffers from dieback. This is obviously necessary to maintain the coherence of the landscape screen.

Conclusion

The extent of the study area and the assessment methodology are accepted by the Council. The optioneering process that resulted in the choice of the location of the converter station relative to the substation is accepted. Notwithstanding the intention to take control of an extensive area of features that would screen the site and also add to these, the nature and scale of the proposed building is such that sections of it will be visible in the surrounding area, even after 20 years. It is therefore essential that the landscape screen envelope is as extensive as it can be, that its management includes addressing the loss of trees through disease and that its retention and management is secured in the long term. The Council is not convinced that the initial set of Requirements meet these objectives. It is open to working with the application to address these areas.

4.6.13 Biodiversity

Issue

Whether the application contains sufficient detail on the habitat that is to be lost, replaced or enhancement to enable the application to be assessed against the Councils planning policy framework.

Application Details

Chapter 16 of the Environmental Statement (APP-131) sets out the effects of the proposal relating to onshore biodiversity. Regarding the Winchester part of the project this includes Lovedean, Kings Pond Meadow and Soake Farm Meadows. The proposal is not considered to result in a significant adverse impact on any habitat or species.

One significant unknown is whether micro siting option B(i) or B(ii) will be adopted. If the former then some 410m of species rich hedgerow and 25m of hedgerow will be lost (16.6.1.13). This is viewed as a temporary loss and

fragmentation of habitats. Section 16.6.1.14 indicates that embedded mitigation in the form of landscape planting will offset ecological effect associated with the loss of hedgerows, although there will be a period of time when the new planting is in an immature condition and will not offer the same habitat value as lost features (16.6.1.15).

The intention is to mitigate through the Construction Environmental Management Plan (CEMP) secured through Requirement 15 which will be guided by the Outline CEMP. This sets out a series of actions relating to work practices and planting.

Planning Policy Context

LPP1

Policy CP16 (Biodiversity) This policy seeks to maintain, protect and enhance biodiversity across the District. A net gain will be sought. The policy outlines 6 requirements that development are expected to comply with of which the following are relevant to this development:

- Protecting local nature conservation sites from inappropriate development.
- Require new development to retain, protect and enhance biodiversity.
- Require appropriate mitigation of unavoidable loss. The benefits should clearly outweigh the harm to habitat and/or species.
- Maintain local wildlife sites and corridors to support integrity of biodiversity network, prevent fragmentation and enable biodiversity to respond and adapt to climate change.
- Support and contribute to targets set out in Biodiversity Action Plan for priority habitats and species.

Commentary

The comments of the Ecology officer are attached as appendix P. A general comment that applies universally is a concern relating to the lack of information in terms of baseline habitat and then clear details of the amount lost, proposed replacement and the degree of enhancement that will take place. The submission of a Biodiversity Metric covering these areas has been discussed with the applicant and is underdevelopment.

An integral part of the local plan policy is to see enhancement to biodiversity. The Council is aware that the new Environment Act will exclude NSIPs from the concept of applying biodiversity net gain to developments. However, there is support for enhancement from a number of sources. Firstly, the Natural Environment & Rural Communities Act 2006 Section 40 which includes a direct reference to local planning authorities to seek

enhancement. Secondly, NPS EN-1 para 5.3.4 says “the applicant should show how a project has taken advantage of opportunities to conserve **AND** (*my emphasis*) enhance biodiversity and geological conservation interests”. Thirdly, the NPPF paragraph 174 supports the concept of enhancement. Finally, LPP1 Policy CP16 (Biodiversity) also promotes enhancement as part of any submission.

It seems evident from the above that the application should embrace biodiversity enhancement and that this should form a part of any additional detail to be presented.

The Council has questions relating to the biodiversity impacts in terms of work practices or new planting at the following locations:

1. The area at Lovedean,
2. The Kings Pond and Soake Farm Meadows area

Lovedean

Figure 6.10.1 the Outline Landscape and Biodiversity Strategy Management Plan (APP-506) shows the indicative level of new planting to be undertaken. In the description of the area, the Council has identified the poor number and condition of east-west connectors through which wildlife can move across the area. One of the few existing east-west hedgerow will be lost to the proposal. The applicant is proposing to replace this with a new hedge PH-2. This appears to be a standard two rows of new hedge plants. This will connect what to the west is a broad belt of vegetation to the broad belt of vegetation on the eastern side where an existing hedgerow has been reinforced with new planting by the National Grid. The Council is mindful of the height and proximity restriction the applicant has imposed on new planting. However, it is the Councils view that still keeping within these restrictions it is perfectly possible for PH-2 to be thickened up with additional planting on its southern side. This would create an enhanced feature that would reinforce the landscape screen and enhance habitat/biodiversity and connectivity.

Mindful of the weak east-west links, the Council would like to see additional actions taken to enhance them. To the north of PH-2 it is proposed to create a screen barrier PW-5. On the eastern side this would link up with a north-south hedgerow EH-8. To the east of this is an area of woodland (EH-5) which the plan indicates would be thickened up (PW-1/PW-2/PW-3). Connecting PW-5 to this enhanced area of woodland (even if space is needed for a field entrance) would improve east –west connectivity.

South of the new access roadway the plan shows a new standard hedge (PH-3). It is considered that this would benefit wildlife if it was formed more

as a linear belt rather than two rows of hedge plants. As well as enhancing connectivity, this reinforced belt would also reinforce the screening of the new roadway that is to be a permanent feature from views from the nearby footpath. Furthermore, an enhanced link should be made to new planting areas PH-8 and PW-17 which again would enhance east-west connectivity.

The Council acknowledges that the above may necessitate changes to the Order limits but that is not an insurmountable issue.

As a general observation, new planting is by common consent immature and does not offer the same level of landscape presence or habitat value as existing features do. Reinforcing new planting will help mitigate for these losses.

At Lovedean a quantity of wood will be generated from clearance and the potential for this to be used to form habitat piles should be incorporated into the future management plans.

KingsPond/Soake Farm Meadows

Based on the submitted details, there is a lack of information on how the application will establish the southern drilling compound and then reinstate the ground afterwards. At the northern end, the justification for trenching through the SINC is considered to be lacking. There is an absence of clarity of the impact on the SINC of establishing a vehicular access off Anmore Road and across the SINC to service the drill recovery compound that will be formed adjacent Soake Road. This is shown coloured yellow on Land Plans sheet 3 of 10 (APP-010). The applicant's view that this designated area holds low interest does not mean its value has been lost completely. Under a different grazing regime it may recover. However, its excavation would undoubtedly destroy a large part of that latent potential.

Finally, in the event that the cable route was to follow the Anmore Road to the east, it has not been clarified if this will have implications on the approach of the cable trenches towards the Anmore Road. It is understood that the cable has limited flexibility and so a larger radius trench may be required if it is to go eastward on Anmore Road. Swinging out to make such a turn may then take the trenches closer to the water courses and potentially impact on the surface or near surface hydrology at this end of the meadow.

Conclusion

At the present time the formal submission is lacking in detail regarding the existing baseline, what habitat would be lost, replacement habitat to be created and what element of this could be classified as enhancement. The Council wishes to see additional actions at Lovedean that would address an apparent weakness in east – west connectivity for the benefit of wildlife. Regarding the meadows areas, in view of the environmental sensitivities

associated with this land, a greater amount of detail is considered necessary relating to the establishment of the two compounds and associated works. The justification for forming an access and laying two open trenches across a section of the designed SINC at the northern end needs greater justification. Its downgrading as a result of the current grazing management fails to consider its potential to return to good condition if the management regime changed. These matters are under discussion with the applicant and it is hoped to make progress on them shortly.

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

Issue

There are insufficient safeguards to ensure the retention of existing, vegetation, its enhancement or the addition of new features that are identified as screening the site. These actions also have the consequence of enhancing biodiversity value. Without securing the long term retention and management of these features, the presence of the Converter Station will have a more significant impact on the surrounding area than the applicant suggests. A corresponding reduction in habitat value will also result.

Application Details

The degree of control that the applicant intends to apply for future maintenance and management of landscape features will vary reflecting the different levels of property interest that exist. Application document reference 2.2 Land Plan Sheet 1 of 10 (APP-008) shows the intended level of control that is being sought over the land at Lovedean. Whilst it is all contained within the red lined application site, the key to this plan identifies that the land will be subject to different levels of control. Some of the land will be permanently acquired whilst other land will be put to a temporary use and then released. The landscape features identified in green on the plan and which go under the title of "New Landscape Rights" will be managed through a deed of covenant. The extent of the period of time that the covenant will cover is uncertain. The submission refers to management/replacement planting being confined to a period of 5 years.

Planning Policy Context

Without sufficient safeguards to ensure the delivery and retention of those existing enhanced or new features then the impact of the building on the surrounding area may be greater than anticipated. A corresponding reduction on habitat value may also result. Accordingly, the following policies are relevant.

LPP1

Policy DS1 (Development Strategy and Principles) Notes the presumption in favour of sustainable development and that development should demonstrate conformity with a series of principles including maintaining and enhancing the importance of environmental heritage and landscape assets.

MTRA4 (Development in the Countryside) After listing certain types of development that could be permitted in the open countryside notes that development should not cause harm to character and landscape.

CP13 (High Quality Design) The core principle of this policy seeks the highest standard of design and seeks all development to demonstrate they have considered 5 criteria, one of which is that the development enhances the natural environment and improves local biodiversity

CP16 (Biodiversity) seeks to maintain, protect and enhance biodiversity, delivering net gain across the district. It states that where unavoidable impacts occur, they should be appropriately mitigated. Proposals should clearly outweigh the harm to habitat and/or species.

LPP2

DM15 (Local Distinctiveness) promotes the conservation or enhancement of trees and hedgerows that contribute to local distinctiveness.

DM17 (site Development Principles) supports development that does not have unacceptable effects on amongst other criteria, ecosystems or landscape character.

DM23 (Rural Character) requires that development within the countryside should not have any unacceptable impact on the rural character of the area.

Commentary

At the PEIR consultation stage the applicant was asked how they were going to secure the future of certain hedgerows and trees that were located in the surrounding area to the proposed converter station (see Appendix M section on chapter 15 Landscape & Visual Impact Assessment). These features had been recognised in the landscape assessment as forming part of the vegetation screen to the Converter Station. In response to these representations, the applicant indicated an intention to bring into the red lined application site a number of “islands” that consist of hedgerows around the Lovedean Converter site.

Where the applicant intends to take full ownership then the lines of control and responsibility are clear. Elsewhere, it appears that the applicant intends to use the mechanism of a “deed of covenant” with the relevant landowner and through them retain and manage the feature.

In the ongoing discussions with Aquind, this approach has been challenged on the grounds it lacks adequate control and security of the features in the long terms. Only those features that lie within the permanently acquired land can be subject of a suitably worded Requirement. At the present time, there does not appear to be any proposal for a link through the dDCO into the deed of covenant and to the landowner that would require specific actions.

Why a distinction is to be drawn between those features on land that will be acquired and those on land that will not be acquired is unclear. All these features serve the same function to screen the proposed Converter Station. The Council has sought a copy of a model agreement of the type that would be signed between the applicant and the landowners. Without sight of the agreement there is a concern that any enforcement may not be possible. A failure to comply with a requirement is enforceable through Section 161 of the PA2008. This section also contains the associated penalty for any breach. If the controlling agreement is one step removed from the DCO then control has been lost.

In discussions with the applicant no model agreement has been presented. It is also unclear if the agreements will contain any "penalty" in the event of a breach. Without some form of penalty, the enforceability of the agreement seems weak.

The applicant is invited to identify another DCO where a deed of covenant has been used this way to control features to screen a site. It is not clear what course of action the applicant will follow if an approach to complete a deed of covenant is rejected. Will CPO powers then be exercised? If so, to what will they be applied?

It is not clear from sheet 1 of 10 (APP-008) if sufficient space has been allowed or should be shown within the red lined DCO limits to allow access to these features on the field side of the roadside hedgerows or the allow access across fields to those features that lie between fields. Without suitable access to carry out management duties then any agreement is not capable of being implemented.

Without sufficient control over the screen features, their value in terms of their contribution to the screening of the site must fall under question. There are remedies to this matter through the provision of additional information or the use of other mechanisms to secure sufficient control over the necessary land to achieve the new planting and retention of existing features as well as their combined long term management. It is recognised that this action may have implications on other parts of the examination process. The Council raised this matter in its representation (PDB-006) and at the re-convened

Preliminary Meeting. The Examining Authority acknowledged this issue and agreed that it could be considered at the Compulsory Acquisition Hearing

One further dimension is the concern that without sight of a model deed of covenant there is no way of knowing if the document is secure should the applicant seek to pass on the benefits of the consent to another party under Part 2 article 7 of the dDCO. Whilst the general requirements associated with a DCO are transferred, if the deed is completed outside the framework of the DCO then it may not be transferable. Confirmation that this is not an issue is requested.

Whether the deed of covenant is judged to be an appropriate mechanism to be used to secure control over landscape features or not, there is a concern that the proposal is only seeking to secure landscape features for only 5 years (Article 32 (12) of the dDCO) (APP-019). This is considered far too short a timeframe. It should be noted that part of the submission includes photomontages of the buildings after 20 years. It therefore appears that the applicant will be relying on screen features over which they have no control. If the building has an indefinite life, then the Council considers that this is the benchmark for the control and retention of the identified landscape screening features.

Conclusion

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 that is also proposed to contribute to the screening. Without the confidence in the mechanism to achieve these objectives there is a real and significant risk that the conclusions of the landscape assessment cannot be delivered. This will result in the building being opened up to more extensive views in the surrounding landscape. Such a degree of exposure would be unacceptable to the Council.

Accordingly, without additional detail to provide the confidence in the use of the deed of covenant, or by the adoption of another mechanism to deliver the requirements, then the proposal is considered to be in conflict with the intentions of the local plan policies set out above. The time period that any management agreement covers must be included and that should be in perpetuity.

4.6.15 Traffic and Highway Implications

Issue

At the present time, the cable circuits are shown in no greater level of detail than confirmation that they will be confined to somewhere between the red lines that define the extent of the DCO limits. Whilst this may be an

appropriate approach when crossing broad open fields it is not a solution for all circumstances. The concern of the Council is that the applicants light touch in terms of exploring the potential practicalities of installing the two cable circuits along the Hambledon Road may have underestimated the degree of impact that will result.

Application Details

The main section of the cable route that follows a road within the district is that section down the Hambledon Road. This is a distance of approximately 550m from the point where it enters the district to the point where it leaves the road to head north across the meadows. At the present time, this section of the cable circuits are shown in no greater level of detail than conformation that they will be confined to somewhere between the order limits. A typical cross section shows the intention to lay each circuit within an open trench approximately 1m deep and with a 5m separation distance between the trenches. This distance is required to maintain thermal separation between the two circuits. It is acknowledged that installation will be influenced by the existing services in the road.

The Framework Traffic Management Strategy Appendix 22.1A (APP-449) contains information on the extent of the time the cable laying will take to complete. Section 5.2.1.1 indicates that the Anmore Road will be closed for between 2 days and 4 weeks (depending on the route chosen) for the installation of both circuits.

Details indicate that the installation in the Hambledon Road will be undertaken in sections using traffic lights to maintain a two way flow of traffic. The indication is that at some point on the journey from Denmead to Waterlooville (A3 London Road) a vehicle will encounter road works and have to negotiate the traffic lights for a total period of up to 46 weeks during the installation of both cable circuits.

Planning Policy Context

LPP1

Policy CP10 (Transport) talks of managing the existing capacity of the transport network efficiently.

Commentary

The Council acknowledges Hampshire County Council as the statutory highway authority for that part of the scheme which falls within the Winchester City Council area. However, there are aspects associated with the traffic assessment in the context of laying the two cable circuits within the highway that require comments from the council on behalf of its residents. These are the people who will be directly or indirectly affected by the proposal.

The focus is on the section of the DCO that relates to Hambledon Road. At the present time, that section of the application relating to the cable circuits are shown in no greater level of detail than confirmation that they will be confined to within the Order limits. Whilst this may be an appropriate approach when crossing broad open fields it is not a solution for all circumstances.

The general character of the Hambledon Road section has been described in paragraphs 1.4.3-1.4.5 above. The concerns of the Council can be summarised quite simply as the following. Based on the level of detail that the applicant has submitted, the Council is concerned that the proposal to lay the two cable circuits in the highway have not been adequately explored in sufficient detail to provide an adequate level of confidence that the work can be undertaken with the ease and within the timetable put forward. A higher level of detail should be provided. Without this additional layer of detail, the applicant cannot justify the assertion that the impacts on road users will not be significantly adverse. The applicant's intention to rely on the contractor to decide on the precise route leaves too much uncertainty. That may be a suitable approach in other circumstances where the highway is wider and may include a bus lane, but not when negotiating a single carriageway which contains other services as evident by the presence of metal covers in Hambledon Road.

It does not appear that the applicant has undertaken any survey work beyond trial holes in the verges. Exploratory work using a combination of trenching across the road to pick up services and then using radar to follow these services along the road would provide a higher level of confidence. It is hoped that the applicant has used the 5 month delay period to work on the collation of more data on this matter. It is noted that radar will not pick up all services such as those in clay pipes.

It is questioned if the applicants has made any allowance for the possibility of dislodging existing utility connection which might then require those service providers to attend and affect repairs

The applicant has indicated that the two circuits need to be suitably separated from each other. The lack of detail on what services are already in the road raises the concern that it may not be technically possible to install the cable circuits whilst maintaining the necessary separation distance, protecting workers and still maintaining traffic flow. Any extended delays to the movement of traffic will have implications not just on residents but also on emergency vehicles. The concern is that the circuit installation may become more complicated than anticipated which may result in a greater period of time when one of the lanes is closed resulting on longer delays or at worse, a proposal to close the road altogether.

In addition to pressing for a more rigorous assessment of the cable laying, the Council is also seeking a commitment through the DCO that the applicant will give an unequivocal commitment to maintaining a free flow of traffic on the Hambledon Road accepting that this may be through the use of a traffic controlled system. In addition, that the dual use path is retained and available for use throughout the work

There is also a concern that traffic may try to get around any roadworks by using the roads through the West Waterlooville Development Area and the applicant is requested to address this in any signage scheme that is put in place.

Confidence in the approach being adopted by Aquind may be enhanced if they could identify any similar utility proposal that took twin trenches along a similar distance of public highway.

In addition to the Hambledon Road sections, the Council notes a further section of highway where cables may be laid. This is along Anmore Road which is identified as one of two options for the cable route in that area. The inclusion of this route raises the question whether the cables can achieve the "turns" onto and off the road. This road could be closed (except for access) for 4 weeks. That scenario would be avoided if the cable route went straight on exiting Kings Pond Meadow.

Conclusion

The Hambledon Road has a distinctly different character than the other roads within the Hambledon Road to Farlington Avenue section. It is considered to provide a more challenging environment to lay the 2 cable circuits within. In response to any questions regarding further detail the applicant states that the final location of the cable circuits and their installation will be up to the contractor who has won the tender for that section of the route. This approach is not considered 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 traffic in both directions together with the pedestrian and cycle link.

4.6.16 Arboricultural issues

This section will address concerns relating to the impact on natural features associated with the cable installation.

Issue

The application lacks sufficient clear and precise detail on the degree of impact that will result to hedgerows and trees as a result of the cable installation and vehicle access formation. The broad approach as set out in

the application places an unacceptable risk on too extensive an area of vegetation.

Application Details

The application sets out the extent of any physical impact on hedgerow or trees to those contained within the Development Consent Order limits. The worst case scenario is adopted which means that any feature identified as within the DCO limits is at risk. The application does indicate an intention to avoid harm to features as work progresses. The application detail Hedgerow and Tree Preservation Order Plans (APP-018) identifies those hedgerow and Trees at risk. These shown 18 important hedgerows and a number of TPO trees, some within the Order limits, other just outside.

The Access and Rights of Way Plans 2.5 (APP-011) shows the locations where the intentions is to form access points along the Order route. These include:

- An access on the north side of Hambledon Road into the open parking area at the end of Southdown View.
- An access into the land on the south side of the Hambledon Road
- An access into the land on the north side of the Hambledon Road
- An access into the land south side of Anmore Road
- Two accesses into the land north side of Anmore Road
- Access points either side of the unnamed lane near Lovedean.

In terms of replacement planting within any hedgerow gaps, section 15.4.7.3 from within chapter 15 (Landscape & Visual Impact) of the ES (APP-130) indicates that the cable can be planted over with hedgerow plants if concrete duct block is used to protect the cable. New tree planting must be at least 5m away from the cable route.

Planning Policy Context

The following polices are considered to apply to a scheme that could see the loss of natural landscape features

LPP1

Policy DS1 (Development Strategy and Principles) Notes the presumption in favour of sustainable development and that development should demonstrate conformity with a series of principles including maintaining and enhancing the importance of environmental heritage and landscape assets.

MTRA4 (Development in the Countryside) After listing certain types of development that could be permitted in the open countryside notes that development should not cause harm to character and landscape.

CP18 (Settlement Gap) This policy seeks to protect a number of undeveloped open spaces that exist between identified settlements. Only development that does not physically or visually diminish a gap will be allowed.

One of the identified areas (Gaps) is that between Denmead and Waterlooville

LPP2

DM15 (Local Distinctiveness) promotes the conservation or enhancement of trees and hedgerows that contribute to local distinctiveness.

DM17 (Site Development Principles) supports development that does not have unacceptable effects on amongst other criteria, ecosystems or landscape character.

DM23 (Rural Character) requires that development within the countryside should not have any unacceptable impact on the rural character of the area

Denmead Neighbourhood Plan

Policy 1: A Spatial Plan for the Parish: seeks to protect the Gap.

Commentary

The risks to vegetation arise from both cable installation and from the formation of vehicle access points. The worst case scenario is adopted in the assessment which means that any feature identified as within the DCO limits is at risk. Whilst it is noted that the application does indicate an intention to avoid harm to features as work progresses, the final decision in terms of cable installation and presumably the vehicle access points will be up to the appointed contractor. This will presumably include not just the vehicle access space but also any necessary visibility splay. Whilst replanting is offered, this is not like for like and would in any event take years to mature.

The Council's concerns regarding potential impact on features resulting from the cable installation are concentrated on the Hambledon Road. There are some impacts on Anmore Road that also need consideration. The main concern on Hambledon Road results from the fact that the Order limits have been drawn to encompass a very extensive area relating to the Hambledon Road and the land to the north.

Both the cable route and the site access from the Hambledon Road into the land to the north has potential to see the loss of a significant section of

vegetation. The plans show that approximately 260m of the hedge/trees are within the DCO limit. As noted in the description section above, the road west of the Soake Road junction is flanked in one section (east of the pump station) by trees. These fall within the Order limits on the north side of the road.

The Council considers that the applicant should refine the route avoiding any trees at all. When crossing a hedgerow, the cable installation should disturb the shortest section possible with the option reviewed if the cable route could follow the access point into the field. The use of a banksman or traffic lights should be considered to enable traffic to leave the site safely rather than removing hedgerow to establish any visibility splay. The established principles should then form part of the relevant requirement and the contract instructions that any contractor is expected to work within.

Whilst the application may be indicating that replacement planting will take place, this would take a number of years to establish and make any level of contribution to the character of the area. The contribution that the existing features make toward local character particularly in the context of the gap between Denmead and Waterlooville has already been details above in Character description 1.4.6 to 1.4.10.

The proposals for the cable circuits to exit the Kings Pond Meadow frontage to Anmore Road whilst also accommodating an access needs further clarify regarding its impact on the existing hedgerow on the south side of the road. On the northern side, there is a tree protected by a TPO which should be left unharmed. Clear information confirming the width of the leeway available on the eastern side of this tree should be presented. The need to examine this section more carefully is heightened by the possibility of one of the cable circuits making a right hand turn onto Anmore Road. The limited flexibility in the cables may result in the need for a gentler curve that will cut through a wider section of the hedgerow as it leaves the meadow. If one of the cable circuits did travel down the Anmore Road for a short distance it would require loss of hedgerow as it turned north again. The plans also show an access in this section of hedge (AC/2/c) and the same point as made previously applies regarding whether a circuit can also utilise a vehicle access gap.

The Council is looking to the applicant to remove the east option and take the cables straight across the Anmore Road. If not, then a clear justification is required. In view of the restrictions on the cable approach towards the Anmore Road as it crosses the SINC the applicant should also provide greater clarity on the cable route relating to the Anmore Road crossing and the implications on boundary features north and south of the road.

Conclusion

To provide an appropriate level of confidence that the cable installation will not result in an unnecessary level of detrimental impact on existing landscape features, the applicant is requested to refine the proposals at both the Hambledon Road and Anmore Road parts of the route. The resultant details should then be included within the requirements and contractors required to work within those parameters. Replacement planting will not be like for like as trees cannot be planted within 5m of the cable route. Even those section of hedgerow that are replanted will take years to make the same level of contribution to local character. The applicant should therefore mitigate for that lost character and biodiversity value by additional planting elsewhere.

4.6.17 Carbon Footprint

Issue

When calculating the CO2 emissions resulting from the construction stage there appear to be a significant residual amount which is not mitigated in any way. The applicant needs to substantiate the statement that imported power will be low carbon in context of the source of that power.

Application Details

Chapter 28 of the Environmental Statement (APP-143) considers the implications of the proposal on carbon emissions and climate change. Section 28.3.7.1 lists the likely significant effects during the construction stage as the following:

- Embodied emissions including raw materials supply, transport and manufacture.
- Transport of materials to the site
- Construction and installation process
- Transportation of waste arising from site

Within the section on Predicted Impacts (28.6) plate 28.1 and table 28.4 present information on construction emissions. A figure of 257,000 tonnes of CO2 is given. This figure applies to the whole project that is subject of this application. Table 28.4 does offer an allocation of the total figure to the elements making up the project. The Converter Station is given a figure of 35,972 tonnes of CO2. No further mitigation is offered beyond the actions outlined. The residual amount is then set within the context of UK emissions in Table 28.12 with the conclusion that the Proposed Development will result in minor, significant adverse emissions. Accordingly, in section 28.8 (Proposed Mitigation and Enhancement) no further actions are proposed.

Regarding the operational stage the imported power will be low carbon and by displacing UK fossil fuel generation will offer potential for significant gains relating to the UK zero carbon target.

Policy Context

Winchester City Council declared a climate emergency in June 2019. A Carbon Neutrality Action Plan was adopted 4 May 2020. Its focus is on carbon emission reduction and elimination, with mitigation /off setting used as a means to balance carbon emissions to achieve net zero gain.

One of the delivery principles is to:

Have an adopted and up to date Local Plan with positive policies which promote low carbon development and transport while protecting our heritage and natural environment, including policies designed to secure that development and the use of land contribute to the mitigation of and adaptation to climate change;

Commentary

Aquind have set out the projected carbon emissions for the proposal at both the construction and operational stages. The construction figures are aggregate for the whole scheme but a figure for the Converter Station is available. It is considered that each stage (construction and operational) should be assessed completely separately from each other.

It is not clear why the emissions of the construction employees travelling to and from the site are not included in the figure. This omission is unusual especially when a figures does appear in the operational stage for those employees engaged in periodic maintenance visits.

The application does identify certain actions to keep emission as low as possible. However, beyond these actions the applicant is not offering any further measures to mitigate against the residual amount. Measures open to the applicant to mitigate in full for the carbon emissions include planting or contributing to local initiatives to reduce carbon.

Regarding the operational phase, the question arises if the overwhelming net carbon benefit figure is reliable. It appears to rely on two factors. Firstly continued generation of electricity in France from nuclear power and secondly the ongoing displacement of fossil fuel generation in the UK. The first figure cannot be guaranteed and the percentage of the renewable contribution to the UK energy generation sector is likely to increase.

Conclusion

The application has considered carbon emissions resulting from the development but excluded those associated with employees travelling to and

from the site. A series of actions are proposed to mitigate for the carbon emissions but this still leaves a significant residual amount. To arrive at the conclusion that this residual amount is of no consequence, it is set within the context of UK emissions. This is not considered an appropriate comparator. The residual amount should be mitigated by further specific actions such as offsetting. The Council is ready to engage with the applicant in exploring ways this can be achieved.

The applicant is invited to offer evidence why they consider that over the life of the interconnector low carbon energy will continue to be imported when many of the French nuclear stations will come to the end of their life in the not too distant future.

4.6.18 Socio Economic Issues

Issue

The application expresses the view that the proposal will benefit both the local community in terms of accommodation and daily spend by workers and the wider area with job opportunities. The Council is concerned that the first benefit is not substantiated beyond the use of a general formula and the section on actions relating to employment is not secured in any way.

Application Details

Within the Needs and Benefits Report (APP-115) section 2.4.4.2 indicates that the construction will increase economic activity in the local area in sectors not directly part of the transmission investment supply chain through actions such as catering and accommodation.

Chapter 25 of the Environmental Statement Socio Economic (APP-140) includes a range of measures that could be used to maximise local sourcing of materials and the workforce. Paragraph 25.9.2.1 states “Measures would be put in place, where possible, to maximise the potential for the workforce and supply chain to be sourced locally. These measures could include:

- Working with local people and local business to ensure that, where practicable, investment in the South East, stays in the South East.
- Engaging with Jobcentre Plus to ensure local job opportunities, where practicable are advertised to local unemployed people and identifying opportunities to help people get back into employment through work placements, education and skills training.
- Upskill people working on the Proposed Development, where practicable through experience, training and development programmes”.

Planning Policy Context

LPP1

Policy CP8: Economic Growth and Diversification outlines the Local Planning Authority's support for economic development, diversification and opportunities to expand the economic base and foster innovation.

Commentary

Regarding the issue of additional spending in the local economy, the Council questions if this is likely to occur given the low level of accommodation around Denmead and the fact that it seems quite likely that contractors will be encouraged to avoid travel routes that take them through Denmead. The likelihood is that the Portsmouth area given its stock of accommodation, will benefit disproportionately in comparison to the Denmead area.

The Council has sought to sign up with developers what are referred to as Employment and Skills Plans (ESP). These are sought on schemes relating to major developments and above. The Council is following the Construction Industry Training Board client based approach in any plan.

Whilst Winchester district may not be considered a high unemployment area, the Council is conscious of the desire to retain existing skills and to broaden the skills base of the district when opportunities arise. Even within schemes such as this one, where there is specialist equipment and highly specialised fitters, there continues to be opportunities for people to be taken on for the duration of the scheme or as construction will span more than one year, apprentices. Some of the work may well be capable of being undertaken by local firms such as the groundworks, building works and landscaping. The important factor is to ensure this is highlighted at the earliest opportunity in any tendering process. If the concept is embedded in the project at the earliest opportunity then contractors will respond more positively to it.

A further element of the ESP that the Council is keen to promote is to highlight future career opportunities for young people in all aspects of the various trades required to complete the project. In normal circumstances this could be accomplished by offering organised visits to the site during the construction phase. The Council is aware that the applicant has expressed some concerns over health and safety of visitors but the Council does not think that with small groups under adequate supervision this concern could not be overcome. If the DCO is granted and should the coronavirus still be present in society when the project is implemented, there are still ways for the applicant to interact with education establishments whereby potential career opportunities can be highlighted to students without actual visits to the site.

Based on the applicant's current intentions which are outlined above, whilst there may be an indication of support, there are no clearly identified steps or any targets established. In meetings prior to the submission of the application, the Council has raised the desire for a formal arrangement with the applicant. As part of that dialogue the Council has provided details on the links to the relevant sections on its website and the Construction Industry Training Board website. The Council wishes to maintain this position in the Examination.

Having reviewed this issue, the Council considers that the ESP can be achieved through a suitably worded requirement. The Council notes that such a requirement featured in the decision relating to the Cedar Hill Solar Farm (Requirement 16 Local skills, supply chain and employment). Winchester CC stands ready to engage with the applicant and produce a suitably worded requirement.

Conclusion

The degree of spending which Denmead will benefit from relating to accommodation and catering is questioned when the it is considered that the village has limited accommodation and that contractors are likely to be discouraged from passing through the village. Although offering to consider supporting local employment and businesses, the applicant is not offering any actions that are formalised in any way. The Council wishes to see a suitably worded Requirement that would cover this area.

Comments on the draft Development Consent Order

The following are the Councils initial observations on the draft DCO. The Councils solicitor understands that a revised dDCO will be issued by the applicants shortly and reserves the ability to comment further at that time.

Part 1

General Provisions preliminary

(the following extracts are just copied for later use)

2 Interpretations

commence" means (a) in relation to any works seaward of MHWS, the first carrying out of any licensed marine activity authorised by the deemed marine licence save for preconstruction surveys approved by the deemed marine licence and (b) in respect of any other works comprised in the authorised development beginning to carry out any material operation, as defined in section 155 of the 2008 Act (when development begins), forming part, or carried out for the purposes, of the authorised development other than

operations consisting of **onshore site preparation works** and the words “commencement” and “commenced” are to be construed accordingly;

“**onshore site preparation works**” means:

- (c) pre-construction archaeological investigations;
- (d) environmental surveys and monitoring;
- (e) site clearance;
- (f) removal of hedgerows, trees and shrubs;
- (g) investigations for the purpose of assessing ground conditions;
- (h) diversion or laying of services;
- (i) remedial work in respect of any contamination or adverse ground conditions;

- (j) receipt and erection of construction plant and equipment;
- (k) creation of site accesses;
- (l) the temporary display of site notices and advertisements; and
- (m) erection of temporary buildings, structures or enclosures,

Part 2

Principle Powers

9 **Defence to proceedings in respect of statutory nuisance**

Both the statutory nuisance assessment and the environmental statement consider that the development will not result in a statutory nuisance. I fail to understand why it is appropriate to include additional defences to that already provided by Section 80(7) – Best Practical Means. I therefore see no need to introduce a new test of “cannot reasonably be avoided” I therefore suggest that section 9 is deleted if it is considered this increases the statutory nuisance threshold.

If this section is to remain, then it references paragraph (g) and (ga) of section 79(1) and then in brackets states (noise emitted from premises so as to be prejudicial to health or a nuisance). It should be noted that this relates to section (g) only as section g(a) relates to “noise that is prejudicial to health or a nuisance and is emitted or caused by a vehicle, machinery or equipment on a street”. Section (g) will therefore mainly relate to noise relating to the installation and operation of the Converter station and section g(a) to the installing of the cabling (development stage).

As the construction phase is temporary and section g(a) will relate mainly to such activity, I would find a rewording of section 9 to refer purely to section g(a) less of an issue due to its temporary nature.

Part 3

Streets

Access to works

- 14(2) This clause sets 20 working days as the turnaround time for any request to a relevant planning authority (which is defined as the district councils) for an access not shown on the plans. This is too short a time for WCC to deal with any submission taking into account that WCC would wish to consult HCC and a number of internal consultees as part of the process.

A period of 40 working days is suggested which harmonises with the processing time to be allocated to requirement submissions.

It is noted that the 20 day period occurs elsewhere (para 16) so a common approach is needed.

18 Protective work to buildings

It is noted that this power only applies to works to buildings that are located within the Order limit 18(1). If the application is seeking consent that could result in development anywhere within the order limits which could be very close to the edge, where is the protection for buildings outside the Order Limit but which lie very close to the actual work area?

Part 5

Powers of Acquisition

23 Compulsory acquisitions of rights and the imposition of restrictive covenants

It is not clear if this applies to the landscape features or if it is focused on the types of apparatus referred to in 23(4) which belong to other statutory undertakers?

Part 7

Miscellaneous and general

41 Felling or lopping of trees and removal of hedgerows

This would allow unrestrained rights to lop chop cut etc without any involvement of the local planning authority. The applicant needs to justify why such a wide ranging power is sought.

The ability to work close to trees or hedgerows is influenced by the size of machinery and a smaller digger or digging by hand could avoid the need to cut trees or remove hedgerows. More survey work should be carried out now

to identify the cable circuit routes. Even in unexpected situations, details should be submitted to and agreed with the LPA before any tree work or hedge removal is undertaken.

42 **Trees subject to TPOs**

This clause gives the same wide ranging powers as 41(1) above without any involvement of the LPA. The same response is offered as set out above.

Schedule 2

Requirements

General comment:

In the Councils view, there is a structural problem with the wording of the requirement that results from the broad range of activities that are allowed to take place before “commencement” is actually triggered. It is clear from the extracts set out above that onshore site preparation works allows a significant range of actions (many potentially harmful to the habitat/wildlife without any regard to their impact on features within the site and that this work precedes the requirement that would agree what features are to be lost (R15 CEMP). Fundamentally, no works of any kind (beyond simple non-invasive surveying) should take place within any phase area as agreed under Requirement 3 before those features (trees/hedgerows) that are to be removed or cut back are identified, the method and position of any barriers to protect any features to be retained and the timing of the work are agreed. The need to protect any wildlife at specific times of the year needs to form part of any submission.

Interpretations

1

- (4) This refers to plant or solar panels being placed on top of the building. This would contradict the design and access statement about no plant or solar panels on the roof. The reference to roof top items should be removed.
- (6) (b) When discussing measurements, it says take the height measurement from existing ground. However, the site for the Converter Station is to be totally re-profiled and levelled so existing ground level will no longer exist.

One solution would be a requirement that sought the creation of a fixed control point in a suitable location on the site that would act as a reference point for any calculations (see additional requirements list).

3 **Phases of authorised development onshore**

add”within that planning authorities administrative area” so it reads

3.—(1) No authorised development landwards of MHWS including the onshore site preparation works may commence until a written scheme setting out all the phases of the authorised development has been submitted to the relevant planning authority detailing the phases of the onshore works *within that planning authorities administrative area*”.

As discussions continue, it is becoming evident that the cable route is not a homogeneous corridor, specifically the northern section from Lovedean down to Waterlooville. The division of the cable route into phases needs to be based on its character differences and not on how a contractor views it.

5 Converter Station and optical regeneration station parameters

In Table WN2, the Lightning mast height is given as 30m. Plans of Converter Station building indicate they will sit on the roof so it need clarifying that this is above the new ground level and not 30m above the roof level which would create a need for a mast and possibly stabiliser cables.

6 Detailed Design approval

- 6 (1) Allows site clearance preparation, establishment and possibly earthworks to start before detail agreed. This approach has no regard to landscape features that are to be lost.

The use of the term “commencement” allows too much preparation work, clearance and other site work to take place before any approval has been given to the extent of vegetation that has to be removed or protected. .

R6 starts off referring to commencement. In the interpretations at the beginning of the Order (see above) this implies site clearance work and preparation work can take place. Regarding both Works 2 and 4 that means loss of vegetation when no such agreement on the losses has been established.

The rural section of the cable route within WCC has distinct issues not experienced elsewhere relating to how much vegetation is removed to allow the passage of cables within the DCO limits and when crossing field boundaries.

Should this requirement insofar as it relates to the design of the Converter Station building not reference back to the agreed principles in the Design and Access Statement?

6(1) the following should be added to the list:

- (i) details of fencing, lighting and lightning masts should be added to the detail to be submitted
- (ii) details of existing and proposed ground levels

6(2)(a) should be revised to say:

(a) Proposed layout and cable circuit positions within the DCO limits.

A requirement to implement the development in accordance with the details approved under 6(2) is missing

7 Provision of landscaping

7(2) Needs a more explicit reference to planting starting in those areas not to be disturbed as soon as work commences.

7(2)(b) Should refer to native planting

9 Biodiversity Management Plan

Problem here with use of term “commence”

The Council has a concern that any screen vegetation may be considerably weakened as a result of ash dieback. Ash removal and replanting with suitable native species needs to be part of any management plan.

In light of discussion on Kings Pond Meadow/Denmead Meadow there is an expectation that this will need re writing.

Any actions should achieve nitrate neutrality regarding use of fertilisers for new landscaping establishment.

Highway Access

10(1) Too late having commencement as trigger as according to the definitions, gaps will already have been cleared.

Should agreement really rest with HCC on access arrangements? Does this not contradict clause 14 above where WCC is to agree any additional access points....question what is the difference in the two sets of circumstances?

11 Fencing

11(3) Need detail of fencing to be installed as it does not show up under No.6 (Detail design approval) unless it is added to 6.

14 Archaeology

Yet again, trigger is commencement which means ground could be disturbed before any survey work undertaken.

Needs the addition of further detail and strengthening of the proposed archaeological mitigation strategy, including for human remains, the submission of an appropriate WSI and its implementation in full would need to be adequately controlled and secured.

15 Construction Environmental Management Plan (CEMP)

Again a problem with use of term commence.

This requirement seems to try to protect features from harm yet again refers to commencement as trigger.

This requirement should be re worded to say “No development of any kind shall be begun”and moved right up the list to position of R4

That the following change is made

Table 5.3 – This is titled “table of dust results per onshore cable corridor section”. There is however no comparable assessment for construction activities of the converter station itself. There needs to be a comparable table/entry for the Converter station construction which should categorise this activity as high risk (in accordance with paragraph 23.6.2.7 of the Air Quality Chapter 23 (Document 6.1.23)

16 External Construction Lighting

Removal of lights at end of construction should be added to this requirement.

17 Construction Traffic Management Plan

Again a commencement trigger issue.

Pre commencement work has associated traffic movements that will be occurring before plan agreed.

R17 references back to the framework CTMP which is 8.2 in appendix 22.2 but the list of items in that document excludes any monitoring and any remedial action that might be required to correct unforeseen problems.

If these plans are prepared by different contractors (section 8.2.1.2 Appendix 22.2) who ensures they all harmonise?

18 Construction Hours

Says construction work, but does that exclude preliminary site clearance and preparation activity? They should be governed by same hours,

Work No3 is excluded

No reference to exclusions to protect wildlife.

Reference to “no discernible activities” is too vague and subjective.

It was understood that the cable road gangs would operate from the Laydown area at Lovedean. However, section 25.4.6.9 gives their working hours as 0700-1700 Monday to Friday and the hours at Lovedean as 0800 -1800 hours for the same days. It is not clear how the road gangs can start an hour earlier if their site compound does not open for another hour (unless a distinction is being drawn between arrival time at the compound and actually starting work?).

The exemption 4(b) should be amended to remove the exemption for receipt of oversize deliveries to the site. Such activity can have significant noise impacts and should therefore be identified as necessary “out of hours work” within the requirements of section 18(3) and be included within the required specific phase CEMPs.

Paragraph (5) states “core working hours” means the working hours stated in relation to the relevant operations at paragraphs (2) and (3)”. Should this not read paragraphs 18(1)a and 18(1)(b)?

19 Traffic Management Strategy

Why is this limited only to Works No 2 What about 3 and 4?

There are aspects to the strategy that are relevant to WCC such as the timing of the work.

Wish to see absolute commitment that two way traffic flow maintained on the Hambledon Road for all sizes of vehicles (with assistance of traffic lights) plus maintenance of combined pedestrian /cycle path.

20 Control of noise during the operational period

Should set maximum noise level

How does this reconcile with exemptions claimed elsewhere in the DCO?

There are serious concerns regarding the wording of this section as I do not consider this gives sufficient confidence in the level of noise mitigation that will be achieved for the Converter station will be as detailed in in Document 6.1.24 – Chapter 24 Noise and Vibration - Volume 1 (plus associated Volume 2 appendices).

Although it is appreciated that the final design and specific equipment has not been finalised there are significant assumptions made within the noise

assessment to derive the conclusion that the impacts from the converter station are negligible. Specially in addition to the assumed embedded mitigation measures (section 24.6) additional mitigation measures are identified in section 24.8(proposed mitigation and enhancement) with regards to one exposure location.

It is therefore considered that this section needs to be reworded to ensure these specific requirements form part of the measures being proposed. This section needs to cross reference the measures identified within Documents 6.1.24 (sections 24.6 and 24.8) and this might also need to be added to Schedule 14 (Certified Documents).

21 Travel Plan

Suddenly trigger is..... will be begun.....Does this include site preparation and clearance?

22 Restoration of land used temporarily for construction

What is definition of completion of authorised development?

Suggest consider using the following: “no later than first handling or transmission of any power....”

23 Control of lights during the operational period

is exceptional circumstance defined anywhere?

Missing Requirements

It is considered that the following aspects should form the basis of additional requirements:

- Establishment and decommissioning of Works 3: the Laydown Compound (methodology approach to constructing the temporary construction compound and then its decommissioning)
- Noise control during construction
- Controls over use of temporary earth storage area.... weed control dampening; max height?
- Decommissioning scheme to be submitted if Converter station does not transmit any power (import or export) for period of 2 years.
- Dust mitigation strategy: dampening site generally and access road; speed control on access road; first part tarmaced up to access to laydown compound.
- It is suggested a levels control point is established on ground that is not to be disturbed and which can then be used as a base reference point for any levels that need to be taken on site.

- An Employment and Skills Plan.

LIST OF APPENDICIES

(The appendices are attached separately from this document)

Appendix A: Copy of plan showing the Winchester City Council boundaries with East Hampshire DC and the South Downs National Park

Appendix B: Copy of plan showing Winchester City Council district boundary in vicinity of Maurepas roundabout Waterlooville

Appendix C: Copy of plan showing Winchester City Council district boundary on Hambledon Road

Appendix D: Copy of the Sites of Importance for Nature Conservation (SINC) at Soake Farm Meadow and Kings Pond Meadow

Appendix E: Photograph taken through field entrance gap on Old Mill Lane

Appendix F: Full version of Local Plan Policies from LPP1 & LPP2

Appendix G: Extract from Denmead Neighbourhood Plan annex A

Appendix H: Copy of extract from LPP1 relating to Map 6 and policy SH2

Appendix I: Copy of Archaeological Officers comments

Appendix J: Copy of Historic Environment Officers comments

Appendix K: Copy of Chartered Environmental Health Practitioners comments

Appendix L: Copy of plan showing Countryside Route options

Appendix M: Copy of WCC PIER response

Appendix N: Copy of Landscape Officers comments

Appendix O: Copy of Urban Design Officers comments

Appendix P: Copy of Ecology Officers comments

(End of Document)

