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Aquind plc

Case No: 19/00522/NSIP

Your Ref:

Enq to: Mr Stephen Cornwell

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29 April 2019

Please quote 19/00522/NSIP on all
correspondence

Dear Sir

Subject: National Strategic Infrastructure Project to be considered under Planning Act 2008 (as amended) by Aquind plc consisting of cross channel electricity connection, with landfall at Eastney, underground cable routed along highway to converter station adjacent Lovedean sub station Broadway Lane Waterlooville.

I refer to the above mentioned project which is currently in the pre-application stage for consideration as a National Strategic Infrastructure Project. This letter contains the formal response of Winchester City Council (WCC) to the Preliminary Environmental Impact Report (PEIR) and the Consultation Document which were put out as part of a consultation exercise running from Wednesday 27 January 2019 to midnight on Monday 29 April 2019.

Introduction

Winchester City Council (WCC) is the host authority with regard to the proposed location for the interconnector station. Whilst the comments will focus on this element of the scheme, sections of the proposed cable route also fall within the WCC administrative area and comments will also be made on the information provided in relation to this aspect of the scheme.

The local planning authority (LPA) notes the status of the proposal and the following comments have been framed to reflect the current stage in the pre application process. In that context, the majority of the comments below are encouraging the applicant to present greater clarity on specific issues and undertake further engagement with the interested local planning authorities. WCC remains committed to working with Aquind in accordance with the spirit that the guidance note recommends.

Two aspects that are outlined below do raise a question of whether the proposal can move on to the next phase without a pause to address outstanding procedural issues. Firstly, the failure to consider alternatives for the cable route and assess them against the chosen route set out in the documents. Secondly, the inconsistent and incorrect use



of terminology and data relating to the duration when sections of the local road network will be impacted by the cable laying operations.

The comments below relate to the PEIR and are structured under the appropriate chapter headings. Where appropriate, references will be made to the Consultation Document. The comments have drawn on views from other colleagues within the authority. In accordance with the planning committee resolution of 19 April 2019 this response has been discussed with the Portfolio Holder for Built Environment.

Chapter 2 Alternatives

The interconnector station

Within an environmental statement the applicant is obliged to include information on the main alternatives they have studied and the reasons for their choice. This is considered to apply to both the choice of the location for the interconnector station and the cable route.

Paragraph 5.9 of the Overarching National Policy Statement for Energy (EN-1) (ONPS EN-1) notes that National Parks should have the highest protection (5.9.9) and that there is a duty to have regard to the purposes of nationally designated areas regarding schemes for locations outside a national park that may have an impact upon them (5.9.12).

The choice of Lovedean as the location for the interconnector station needs further explanation so it is an open and transparent process. The proximity of Lovedean to the South Downs National Park and its impact when viewed from within the park, does not appear to have been a factor in the decision to choose this site over Chickerill in Dorset. The technical requirements appear to hold primacy above everything else. The first indication that any consideration has been given to the National Park designation is in the choice between the various site location options at Lovedean (2.5.2.1).

The onshore cable route

The final section of the cable route past Waterlooville (excluding a short section of the Hambledon Road) lies within the administrative area of WCC. However, WCC feels it is entitled to review the choice of the A3 up to Waterlooville as this route dictates the position where the cable route enters the WCC administrative area. In this review no preference is given to the merits of Eastney as the landfall point or of the choice of the cable route up through Portsea Island. The concern of WCC is that the PEIR document does not appear to show that any consideration has been given to any alternative other than the A3 route once past its junction with the B2177 (Portsdown Hill Road).

The only assessment of cable routes within this chapter is made in the context of the alternative land fall points and how they might lead to Lovedean. Once Eastney was identified as the preferred landfall point the cable corridor seems to have become fixed in so far as the section up the A3 is concerned. It is considered that the review of alternatives such as that applied to the location of the interconnector station, should have equally applied to the cable route. The 2017 Regulations require an Environmental Statement to include *“a description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an*

indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.”

This has not been undertaken in so far as the cable route up the A3 is concerned.

The need for such a review is necessary as a potential and realistic alternative may exist. This is the “countryside route” running northward through land to the west of the built up area of Widley and Purbrooke. A plan is attached to this comment showing an indicative route. Whilst the countryside route may have some constraints, the road route is not without its complications. The benefits of the road route appear to favour the applicant, with all the negatives aspects falling on the public and public bodies. These constraints are not simply confined to the delays that road users will suffer, but will also extend into the future as the presence of the cable hinders road infrastructure improvements over the next 40 years (the life of the cable). Measures by Aquind to address these concerns such as laying the cable at depth are likely to increase costs and installation time with the consequential additional delays to road users. The difference in the installation speed with more rapid progress across open ground than on the highway is a factor already acknowledged by Aquind.

Without an open assessment of the merits of the alternative cable routes, it is difficult to see how the applicant can show that a meaningful evaluation of the options (as required by the regulations) has taken place. This applies even if the outcome were to support the road option. Accordingly, the project should pause so that the options can be assessed in close discussion with the relevant local planning authorities (LPAs). Within that process, the constraints and benefits of the alternative routes can be fully reviewed.

Building Design

Whilst the converted station consists of a range of buildings and items of plant, the most prominent in terms of size, are the two convertor halls. Overarching National Policy Statement for Energy EN-1 acknowledges that the nature of a facility can limit the extent of good design (4.5.1). However, it also states that applicants need to demonstrate how the design process has been conducted and how the design evolved (4.5.3).

The PEIR does not appear to contain any detail regarding the design approach for these buildings. The only reference to the design is in the Consultation Document under 2.4.13 Design Parameters. WCC has previously expressed a view that in the context of the sensitive rural location, the building design should be a specific section in its own right within the Environmental Statement. That view is maintained in this response.

In the view of WCC the scheme continues to lack a clear justification for the design approach that is being followed which is shown as a simple box shape building. Consideration appears to have moved onto the cladding options without any consideration of the basic outline form that the building should adopt in the context of its surroundings. WCC continues to seek engage in discussions on the overall design of the converter halls. This should include consideration of reducing ground levels and screen planting at various positions (near distance, middle distance and far distance).

A review of several Development Consent Orders provides no confidence that this issue can be left to the design code for a resolution. In the view of the LPA, it must be considered now and established before the examination stage. Accordingly, for there to

be any meaningful engagement it must form part of the pre application discussions between the applicant, WCC, East Hampshire BC and the South Downs National Park authority.

The views of the Urban Design Officer have been sought and the following is taken their comment:

It was clarified during the process, on a meeting with representatives officers of all councils involved, how much the building design of the Converter Station are constrained by its operational requirements. Therefore it was explained that the design inspiration for the proposed building is the SDNP with its distinctive colour palette and undulations. And the applicant believes that through creative treatment of the façade, the building could seemingly blend into its surroundings.

It doesn't seem a good approach to reduce all the design process of such a large building to a simplistic exercise of how the elevations should be 'dressing up'.

In terms of building form it doesn't seems to have been explored or demonstrated other options that could address better the surrounding context or that would help to minimise the visual impact such as, partial burring the building into the ground supported by a robust landscape treatment strategy.

As well, in order to have an opinion of how much the building should be perceived from distant or close views, the proposed should be supported by a robust character and context studies to illustrate how that has informed the design including the site plan, massing, heights and the buildings' character and appearance.

Therefore, from a design perspective it is not clear how the design principles informed the building form and why the design should comply with defined parameters.

It is considered that a more holistic approach in terms of setting and design should be taken in consideration in order to achieve a greater landscape-led design concept. Good design should be take place whether a building can be seen or not from public view

The process to date has also constrained wider public engagement in the design question which is considered a negative step. Opportunities to present the public with options have not been taken. The ability of the applicant to show genuine engagement risks being lost.

Any new planting to screen the site will take a substantial time to develop into any meaningful feature. This means that the buildings will be in view for a long period of time before they are screened and from some locations, the building will always be open to view. Accordingly, its design and how it fits into the rural landscape is a significant issue.

Based on the above, WCC wishes to see further discussion on the design issue in conjunction with other related elements.

Chapter 15 Landscape & Visual Impact Assessment

The sensitivities of the site are well known and recorded. The landscape officer has provided the following comments:

At 2.4.18 of the Consultation Document it is stated that 'Landscape mitigation will be provided in order to screen the building as effectively as possible'. And yet at Figure 11, where a view is shown from Viewpoint B at '20 Years Post Construction', the buildings are not 'screened' at all.

The draft mitigation plan at figure 10 on page 36 shows the proposed converter station taking out a substantial belt of woodland. If the footprint were moved just 25m further east this existing 'screening' could be retained.

If a decision is taken to screen the building as far as possible, as a principle of design from the outset of the project, given the environmental sensitivity of it's location, then considerably more effort will be required, both to retain existing woodland and conceal the building using planted bunds or earthwork. There is still an expectation that the footprint could be set at a lower level. There is nothing in the soils or groundwater chapters to show why this is not feasible with the resultant material then used as part of any landscaping scheme.

If on the other hand a design decision is taken that efforts to 'screen' the building will be futile, then the design and appearance of the building assume greater importance, particularly as it will be viewed from within the National Park.

2.4.13 of the Consultation Document discusses how the building will appear in the landscape. It is stated that the architect's approach has been to draw design inspiration from the colour palette of the South Downs with the intention of the building blending into its surroundings.

However, I remain unconvinced that the colours chosen will ever 'blend' with a constantly changing landscape. The colours in the landscape change with different weather conditions, different seasons, different lighting conditions and even different times of day. Attempts to blend with the landscape by mimicking its colours are rarely successful. It is recommended that instead, Aquind choose visually recessive tones or darker colours which have the effect of reducing the apparent bulk of the building, for example

- *RAL3007 Black Red*
- *RAL 5008 Grey Blue*
- *RAL 6009 Fir Green*
- *RAL 6015 Black Olive*
- *RAL 7021 Black Grey*
- *RAL 8019 Grey Brown.*

The landscape impact needs to be considered as part of the overall design issue and WCC will continue to respond positively to any invitation to discuss this further.

Within the Consultation document there is an annotation on Figure 15.9 (Landscape Mitigation Plan) to planting beyond the red lined application site but no indication how this is to be achieved. In a similar vein, the photomontages from the viewpoints rely on vegetation to screen the view, but offer no indication of how that vegetation will be retained and maintained. An opportunity exists for the applicant to adopt the concept of the Environment Fund which has been raised at a previous meeting. This would be a mechanism to achieve or retain the off site planting referred to above.

Chapter 16 Onshore Ecology

The level of comments on this section has to reflect the fact that the applicant is still formulating the information on biodiversity.

The evidence base that is outlined gives the impression that it has recorded evidence of animal species as static features and no consideration in the predicted impacts appears to have been given to the implications of the compound acting as a barrier to the movement/migration of species across the land, or the use of the “airspace” by birds or bats. This applies to both the construction phase when the affected area will include the compound/laydown area and during the operational phase when the site will be secured by wire mesh fencing.

No consideration is outlined regarding the implications on biodiversity of constructing the access road which is to be retained during the operational phase. A 7.3m concrete road will form quite a barrier severing movement from the open land to the south and west towards Stoneacre Copse which is an the ancient woodland. This applies to both the construction phase and the operational phase.

WCC considers that the scheme should incorporate a greater degree of mitigation work and is open to working with Aquind in identifying the extent and scope of that work before the formal submission stage. As part of that position, WCC considers it would seem sensible to “future proof” the analysis by factoring into the proposal some biodiversity net gain. This is referring to the proposal to require all development to result in a positive improvement in biodiversity. This goes beyond any mitigation proposed. It seems this requirement is likely to be in force when the examination stage is reached following changes to regulations which are currently being reported in the press.

Chapter 20 Heritage

I offer the following comment which draws heavily on the view of the Archaeological Officer:

Most of the greenfield areas lie in Winchester district and you are proposing to undertake GS over these areas as previously discussed, so this is fine. Just one query, when you say First Stage GS (blanket magnetometry), are you proposed detailed survey or just scanning?

Regarding the JB areas, JBs 45 and 46 also lie in Winchester district and not within Havant.

Re the exclusion of JBs 38 & 44 from the proposed GS, I agree that these can be excluded (JB38 - as this has been subject to previous GS and evaluation trenching in connection with the Waterlooville MDA and no further archaeological mitigation work has been required in this area. JB 44 is excluded as it is currently a car park /

unsuitable for survey; this area could be looked at during a later stage of this iterative programme of evaluation work.

I look forward to receiving a WSI for the GS in due course.

Has the archaeological monitoring of geotechnical SI works which we corresponded on in April last year been completed yet? I assume that this report will be made available in due course, to consider together with the GS results?

The engagement between the applicant's archaeologist and the Councils officer will continue.

Chapter 21 Traffic & Transport

The site access lies within the EHBC administrative area and comments on the approach are left to EHBC and Hampshire County Council.

Cable Route

Whilst fully supporting the position that questions the alternative cable routes as outlined above, the LPA makes the following observations on the cable route as shown in the Consultation Document and as set out in the PEIR.

At the A3 (London Road) and B2150 (Hambledon Road) roundabout the cable route crosses into Winchester District before exiting part way along the Hambledon Road and then re-entering the district for the remainder of its route up to the interconnector station.

The Hambledon Road B2510 is the main link into and out of Denmead from the east and the most direct route from Hambledon to the A3. No other practical alternative exists. The degree of disruption in the event that the road is excavated with traffic light controlled flow cannot be underestimated. It is surprising that Aquind do not have full data on projected traffic delays arising from shuttle working that could be extrapolated into how long a vehicle might be delayed.

Section 3.6 of the Consultation Document sets out the current alternatives for the route through/past Denmead.

The option of running a single circuit (one group of cables) down each of Mill Road and Martin Road with all the implications that has for residents is not favoured. Some practical alternative has to be found.

Of greater concern is the presentation of the data relating to the level of disruption that will occur (worst case scenarios). The figures presented in Section 3.6 of the Consultation Document are inconsistent in their use of the terminology. In places they refer to all the work within the road but elsewhere they only refer to the installation of one circuit and in other sections carry no clarification. The full installation will involve two circuits. Consequently, the figures given should be doubled. On page 61 it states:

*The estimated worst case traffic disruption associated with the trenching of **each circuit** (my emphasis) on this route is approximately:*

- *B2150 Hambledon Road between Soake Road and Milton Road - 66 days shuttle working.*

- *B2150 Hambledon Road between Milton Road and Maurepas Way - 28 days single lane closure*
- *A3 Maurepas Way - 17 days single lane closure*
- *Forest End - 9 days full road closure • A3 London Road between Maurepas Way and Ladybridge Road - 44 days bus lane closure, 28 days shuttle working and 1 day full closure north of Ladybridge roundabout*
- *A3 London Road between Ladybridge roundabout and Portsdown Hill Road - 61 days bus lane closure and 18 days shuttle working*
- *Boundary Way slip road - 4 days shuttle working*

All the above figures should be doubled to show the correct period of time when the roads are subject to some work (worst case). The consequence of a corrected assessment means that a regular traveller driving from the centre of Denmead to Waterlooville (worst case scenario) would encounter a delay at some point on that road over a period of 9.4 months. Not the 4.7 months that is implied in the document. It is a concern that members of the public may not have understood the full implications of the duration of the work programme when they have been engaged in the most recent consultation exercise.

As concerning as the above point is, there is a more fundamental issue that this data has been used in its uncorrected form in the PEIR to arrive at the information in Appendix 21.2 Traffic Delays on Cable Corridors. This analysis sets out the magnitude of the impacts arising from the installation work. Link 4.1 refers to the section of the Hambledon Road and uses the 66 day construction period that appears in the extract from the Consultation Document that is copied above. The impact for this section of road is rated as "Moderate Adverse". If the correct duration was displayed (132 days) the rating may have been greater.

There are other examples where only half the time period has been used in assessing the significance of the effect on road users. WCC has not reviewed any of the data in Table 21.2 south of the A3 and B2510 roundabout but the question must be asked whether other results are also based on the use of only half the true disruption period. If so, this is a significant flaw in the data which all interested bodies including members of the public have read and used to make up their view on this element of the scheme.

For some people the traffic implications may have been the most important consideration. This matter is not something which can be casually passed over and corrected at the next stage of the process. Whilst WCC and the other authorities will be in contact with Aquind, for the public the next opportunity to view and comment would be the examination stage. It is questioned if Aquind can reasonably present people with corrected figures at that stage in the process when no options or alternatives are available. Aquind does not know how many people may have viewed the details and not responded based on the incorrect figure. Had the true level of disruption been presented it is possible a higher number of people would have responded.

The other implications of underestimating the traffic disruption are on the other sections of the PEIR and most significantly on how it might affect the balance in weighing up the merits or otherwise of the alternative countryside route. It should be noted that if

adopted, that option would have no direct impacts on Denmead and only a marginal short term impact on Hambledon Road as it was crossed or drilled under.

The use of part of the site at Lovedean as one of the two temporary compounds (paragraph 21.4.12.11) to support the cable laying should be clarified in more detail specifically regarding the traffic implications of importing and then exporting the cable drums and the route that would be adopted to reach the northern edge of Denmead. The identification of an alternative temporary compound should be sought.

Chapters 22 (Air Quality) and 23 (Noise and Vibration)

The Environmental Health & Licensing Officer has made the following comment:

I have no adverse comment to make on the issues and scope identified in either of these chapters. With regards to noise and vibration this is recognised as a potential adverse impact. However, the detailed modelling and mitigation proposals will not be provided until the plant design criteria have been finalised. These will be available in the final Environmental Statement, so detailed assessment cannot be provided at this stage.

Chapter 24 Socio Economic

The range of mitigation measures needs to be more expansive.

Chapter 27 Carbon and Climate Change

Notwithstanding the mitigation measures set out in paragraph 27.7 there will still be a net increase in the carbon footprint resulting from the development. It is considered that the applicant should broaden the scope of the mitigation to include more innovative measures relating to works both within the red lined site and off site.

Conclusion

Winchester City Council stands ready to engage with Aquind in discussing all the issues identified above.

The most immediate action is to address the two procedural concerns outlined above in the introduction. Firstly, the alternative route for the cable run and secondly, the reliability of the data on road disruption. It is worthy of note that if the former proves to be a viable option then it could ease or virtually eliminate the latter north of the B2177. It is noted that the scheme is still within the formative pre application stage. However, both of the elements identified above have implications not only on the views and responses of the statutory consultees but also on the involvement of the general public and how they view the scheme and participate in the process. These are not matters than can be simply acknowledged as the scheme moves on to the next stage. Engagement in the pre application stage and the recording of that contact must count for something. If elements of the pre application work are procedurally flawed then they need to be addressed before the scheme advances. Progress into the next phase should be paused to review how to remedy the situation. This discussion should involve the applicant and the local planning authorities so that confidence in the process is maintained.

Action is also required in terms of site recording to address the ecological concern that the development may act as a migratory barrier to the movement of wildlife and also restrict air space for birds and bats.

In addition, WCC wishes to engage in meaningful discussions on a range of community benefits which a scheme of this nature should bring forward. Whilst some references have been made to circumstances where such action offers opportunities, a more extensive outline will be prepared in a separate position paper.

If you have any queries or require further information, please do not hesitate to contact the Case Officer, Mr Stephen Cornwell on 01962 848 485.

Yours faithfully

Julie Pinnock BA (Hons) MTP MRTPI
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