

From: [Oliver, Lewis](#)
To: [Aquind Interconnector](#)
Subject: Application by AQUIND Limited for an Order Granting Development Consent - deadline 2 submission
Date: 20 October 2020 08:51:02
Attachments: [image001.png](#)
[HBC Deadline 2 responses.pdf](#)

Dear Sirs,

Planning Act 2008 – Section 88 and The Infrastructure Planning (Examination Procedure) Rules 2010 – Rule 6

Application by AQUIND Limited for an Order Granting Development Consent for the AQUIND Interconnector Project

In accordance with the published Rule 6 letter, please find attached the following from Havant Borough Council to comply with deadline 2.

I would be grateful if you could please confirm receipt of the attached documentation.

Regards

Lewis

Lewis Oliver
Principal Planning Officer
Planning Services
Havant Borough Council
Public Service Plaza, Civic Centre Road, Havant PO9 2AX
Direct Dial Telephone Number: (023) 9244 6263
e-mail: lewis.oliver@havant.gov.uk
www.havant.gov.uk
www.facebook.com/havantboroughcouncil
www.twitter.com/havantborough

Advance notice of leave: 21st-22nd October, 19th – 23rd November 2020



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AQUIND Interconnector

Application by AQUIND Limited for an Order Granting Development Consent

Deadline 2 responses

Havant Borough Council

1. Introduction

1. In accordance with the Rule 6 letter, which outlines that for deadline 2, the following are required by relevant authorities:
 - Comments on responses for Deadline 1;
 - Comments on Applicant's responses to Relevant Representations;
 - Comments on responses to ExQ1.

2. HBC wishes to express concern about the significant amount of information that has been submitted by the applicant at deadline 1. This information includes significant revisions and additional information within the Environmental Statement. Given this level of information and in the interests of natural justice, a summary of the key points is made below, with a further detailed response to follow, once we have had an opportunity to consider the further information in detail, if required.

3. For the purposes of clarity for the ExA, the main points that are to be covered in this response relates to:
 - Applicant's Responses to Relevant Representations (Document Ref:7.9.4 -RR-094)
 - Supplementary Alternatives Chapter, specifically chapter 8 – Countryside Route (doc ref 7.8.1.3)
 - Noise, Vibration and Air quality - The LPA will continue to discuss the Onshore Outline CEMP and dDCO Requirements with the applicant to address the outstanding concerns and establish an agreed approach. It is anticipated that further information in this regard will be provided via the Statement of Common Ground, to be submitted at the relevant Deadlines.

Alternative Route Opportunities

4. The Supplementary Alternatives Chapter, specifically chapter 8 – Countryside Route (doc ref 7.8.1.3), outlines many reasons why the applicant has discounted this route. However, no indications of dates of when this potential route was considered have been provided. From the reading of the document many of these arguments have been retro-fitted to conclude that the highway route is the chosen, without full due consideration of this route in detail.

Ecology

5. Regarding the ecological impacts of this proposed route for HBC's alternative route considered from paragraphs 8.1.4, as has been highlighted HBC are not the Local Planning Authority for the area and did not have access to the level of information required to consider this route in detail. Winchester City Council's route is more informed as they are the LPA for the area, with this route being considered by the applicant in paragraph 8.1.5. It is noted that in paragraph 8.1.5.5 that no fieldwork surveys have been undertaken to consider the presence of protected species in this area. It is stated by the applicant that their presence is known, this may well be true, however with the appropriate surveys being undertaken a route is likely to have been devised that either avoided such protected species or provided appropriate mitigation measures regarding protected ecological areas.

Sterilisation of land

6. Regarding the sterilisation of land considered by the applicant in paragraphs 8.1.7. The applicant raises points that the cable routing through this area would sterilise the land for both future and current committed developments. Regarding the future of development, these areas are within the administrative boundaries of Winchester City Council. However, if any of this further land was to be allocated for housing, then policies would be given due consideration in the Local Plan process, would be in place so that if any development were to be proposed then any layout of the development would need to take account of the cable route, as such this is not a reason to dismiss this route on this issue alone.
7. Paragraph 8.1.7.3 outlines concerns that the development would adversely impact on the West of Waterlooville Major Development Area (MDA), by severing the site and being in the open space on the western part of the site. It is considered that appropriate mitigation

measures could be utilised to avoid such conflicts, indeed the route of the cable could be located to the west of the site, to avoid any such conflicts.

Minerals and waste

8. Paragraph 8.1.7.9 outlines concerns that the proposed cable routing would sterilise areas identified in the Hampshire Minerals and Waste plan, comprising soft sand (pale yellow) and brick clay (brown). With any development appropriate mitigation measure to avoid such sterilisation occurring, it is noted that no reference is made to the applicant discussing this matter with Hampshire County Council as Minerals and Waste Authority, who would provide advice on this matter to ensure that measures were in place to maintain the ability to utilise these mineral deposits.
9. Following our own discussions with the Minerals and Waste Authority, who have considered the data within the Aquind ES Addendum Appendix 3 Supplementary Alternatives Chapter. Given the relatively small areas of safeguarded minerals which the proposed routes would sterilise, and that there are no safeguarded mineral or waste sites in the vicinity of the proposed countryside routes, they cannot see a reason for an objection to either of the proposed countryside routes should they be adopted, subject to suitable controls.

Changes to the proposed development - 8.1.10

10. This element of the statement outlines the need for the measures required for construction, regarding working areas, haul road, and access. The applicant has noted that "*Whilst these are relatively minor structures in the landscape, they would nonetheless be noticeable from a visual perspective.*" The impact on the landscape would also be temporary and could be mitigated through appropriate mitigation works

Environmental impact of proposed development – 8.1.12

11. This matter would be for the Highway Authority to consider these detailed technical points. However, whilst noting that some disruption would be created by a potential countryside route, this disruption. It is clear from the applicant, who acknowledges in paragraph 8.1.12.3, that the countryside would be a installed more quickly.
12. The proposed route of the cable along the highway network within the administrative control of Hampshire County Council is shown on sections 1-4 of the onshore cable corridor plans. This brings the cables from the proposed converter station site at Lovedean down to the Portsmouth City Council boundary at the A3 London Road (south of The Dale). The route primarily runs along the A3 corridor and B2150,

which are highly trafficked, important priority bus routes, and play a key role within the local network. The cable route corridor in this area caters for the bus 'Star' routes 7 and 8 between Portsmouth and Waterlooville which is a key access facility to Queen Alexandra Hospital and Portsmouth's employment areas.

13. The proposed route is already constrained to further improvement in general capacity due to the available highway land and frontages of private properties. The ongoing ability for the Highway Authority to be able to maximise the use of the highway land therefore remains paramount on this key connection to Portsmouth and the A27/M27 corridor and therefore should not be constrained by the provision of non-highway infrastructure within the Highway Boundary.

14. Whilst the Supplementary Alternatives Chapter Environmental Assessment provides some further additional consideration of an alternative non-highway focussed route, Havant Borough Council are still to be convinced that the conclusions that the ES reached on this matter are fully justified. In particular, little understanding, and weight, appears to be given to temporal disturbance to the highway during construction, subsequent longer-term impacts of this disruption and the impact on future planned highway schemes including:
 1. Ladybridge Roundabout Capacity Improvements as a s106 obligation of the Waterlooville MDA planning permission and potential TCF works;
 2. Stakes Road/Stakeshill Road capacity improvements as a s106 obligation of the Waterlooville MDA planning permission;
 3. Milton Road/Lovedean Lane junction improvements as a result of permitted development at Woodcroft Farm secured within the s106 agreement for the development; and
 4. Resurfacing works at the A3 corridor.

There is also the ongoing potential for future transport works with long term aspirations to improve the bus provision along the A3 corridor to further support the bus 'Star' routes and improve the sustainable transport offer within the area.

15. Furthermore, this additional information indicates that many mitigation measures for the countryside could be employed, with regard to visual impact, highway and crossing of watercourses. Indeed, this route could provide some benefits by utilising the apparent sterilised land for long term public benefit. Other matters such as ecology, whilst acknowledging that any countryside route would need to consider the

impact on protected area, the routing of the cabling could be positioned in a way to either avoid or mitigate any associated impacts.

16. Havant Borough Council will seek to continue to work proactively with the Applicant, partner local authorities and other interested parties to explore how these impacts can effectively be minimised and, if necessary mitigated.
17. Finally, within the most recent submission by Aquind (REP1-127) Statement in Relation to FOC Aquind are now saying they will act as a Telecommunications Code Operator which gives them powers to run and install telecommunications equipment. The statement talks of them installing branches off the main route. Such an opportunity would not be possible if the cable went cross country as the main opportunities for further telecommunications installations would only really exist if the cable took the road route. This raises the question of the degree to which the potential commercial opportunities associated with the telecom element of the scheme have been a significant driver in the choice of the road route and conversely, resistance to the countryside route.