

**Application by Aquind Limited for an Order Granting Development  
Consent for the Aquind Interconnector (Ref. EN020022)**

**TRANSCRIPT OF SUBMISSIONS TO ISSUE SPECIFIC HEARING 3  
Environmental Matters  
PORTSMOUTH CITY COUNCIL  
30 NOVEMBER 2020**

**1.0 INTRODUCTION**

- 1.1 Portsmouth City Council ('PCC') is an Interested Party and Affected Person pursuant to the Planning Act 2008 in relation to AQUIND Limited's ('Aquind' or 'the Applicant') application under the Planning Act 2008 (as amended) for a Development Consent Order (DCO) in respect of the AQUIND interconnector (the 'Project' or 'Proposed Development') : a 2000MW subsea and underground High Voltage Direct Current (HVDC) bi-directional electric power transmission link between Normandy in France and the South Coast of England.
- 1.2 PCC is due to attend the Issue Specific Hearing in respect of the Environmental matters programmed for 15<sup>th</sup> December 2020 and make submissions at that hearing.
- 1.3 The following is provided in order to meet the Examining Authority's ('ExA') requirement for a full transcript of any oral submission PCC intends to make at the said hearing as clarified with the Examining Authority (ExA) in PCC's email of 23 November 2020 to which the ExA responded on 25 November 2020 confirming the proposed approach.

## **2.0 SUMMARY OF ENVIRONMENTAL ISSUES**

### **Habitats Regulation Assessment**

- 2.1 PCC note that common ground is still being progressed between the applicant and Natural England regarding this matter. Both Langstone and Farlington are sites designated as overwintering bird grassing sites for Brent Geese. Following cable laying operations there is concern that there may be insufficient grass coverage intact and ready for the winter season - and which could detrimentally affect the birds overwintering on these sites. The continued uncertainty and excessive optimism provided within the indicative work schedules provided by the applicant are considered by PCC to be of significant concern based on the need to avoid playing seasons for effect sports pitches, support other recreational activity at Farlington and maintain adequate habitat for effected species.

### **Landscape, visual impacts and tranquillity**

- 2.2 PCC have maintained concerns regarding the unjustified visual intrusion of the ORS buildings and compound on the open space at Fort Cumberland and the heritage value of this significant designated asset.

### **Noise**

- 2.3 PCC remains concerned, notwithstanding the suggestions made by the applicant regarding management and mitigation of out of hours working in the Onshore Outline CEMP, that noise levels during construction, particularly potentially prolonged periods of night-time noise will have significant impacts in the areas of Havant Road between Farlington Ave and Eastern Rd, Fitzherbert road and Sainsbury's car park, and Eastern Road between Airport Service Road and north of Milton. Of particular concern is Harbourside Caravan / Mobile Home Park, where residential occupants in these caravans do not have the same sound insulation properties as houses.
- 2.4 The applicant's decision to reserve many matters to post-consent requirements to be managed by as yet un-appointed contractors has been an ongoing concern to PCC especially as mitigation measures have not been clarified for day or night time noise. It is a matter also of great concern that this is proposed to be left wholly to the contractor who would identify specific mitigation measures. It is noted in the Noise Report that different contractors may be employed to carry out the works. As mentioned in its submissions to the ExA about highways impacts, the Council is concerned that delays by one contractor in one section may require elongation of the timetable or additional night-time working without recourse to Section 60 (Control of noise on construction sites) or Section 61 (Prior consent for work on construction sites) of The Control of Pollution Act 1974 due to the proposed Art 9(2) of the dDCO.
- 2.5 PCC is similarly concerned that matters of noise management for the operation of the ORS are reserved to requirements, creating uncertainty in respect of the design for these large structures which have a clear potential for significant intrusion.

- 2.6 PCC is reviewing updated submissions from Deadline 4 and discussions are ongoing with the applicant regarding issues of noise and vibration. PCC reserve its position at this stage and will therefore provide an update to the ExA at the hearing in respect of any further issues, mitigations or clarifications that have been secured from the applicant.

**Socio-economic assessment**

- 2.7 The proposal will cause significant adverse impact to the provision and enjoyment of open spaces and playing pitches in the densely populated city of Portsmouth. A Framework Management Plan for Recreational Impacts [Doc Ref 7.8.1.13] has been updated for Deadline 4 and is being reviewed by PCC. Until such time as that review can be complete however the Council must reserve its position in respect of the adequacy of the assessment of the impacts and the avoidance measures suggested.
- 2.8 To date the applicant has provided minimal suggestions to reduce the adverse impact and provided no suggested mitigation for the acknowledged residual impacts of loss of playing pitches, open space and associated parking during construction. As part of its ongoing consideration PCC has, and will continue to, encourage the applicant to consider entering into an obligation for a Community Fund to mitigate the harm caused to local community's health, wellbeing and cohesion arising from the loss of these essential open space facilities. The ExA is asked also to support this as an approach.
- 2.8 Loss of playing pitches at Bransbury Park, Langstone Campus, Kendall Stadium sports ground and Farlington will result in loss of income for the City and University but more significantly displace community clubs and other uses and create uncertainty over availability over multiple playing seasons resulting in long term detriment to teams and clubs in the City. PCC is concerned that the applicant's indicative works plans are too optimistic in respect of work periods and reinstatement resulting in significant and long term disruption to these facilities. The consequence of further playing seasons being deferred and the loss for a time of the facilities will have a progressively detrimental effect on the life of the club as well as the health and wellbeing of the residents of Portsmouth who use this land.

### **3.0 ExA's QUESTIONS**

- 3.1 PCC has been informed by the applicant, at meetings of 12th and 25th November 2020 that they intend to provide substantive updates to their submissions to comply with requests that PCC have raised in respect of key matters, and have provided additional information at deadline 4 that is being reviewed to enable response in line with the examination timetable at deadline 6. While PCC will therefore continue to engage with the applicant in respect of these issues to assist the ExA PCC will also comment at the hearing on any progress or amendments that have been made based on review of the latest made available.
- 3.2 PCC notes however that a number of questions within the published agenda for ISH3 specifically seek responses from the City Council, or otherwise seek clarification on matters that the City Council believes we can assist the ExA with. These responses are provided below, and are offered without prejudice to any amendments that may have to be made once further submissions from the applicant are received.

#### REF 6 n) Optical Regeneration Stations

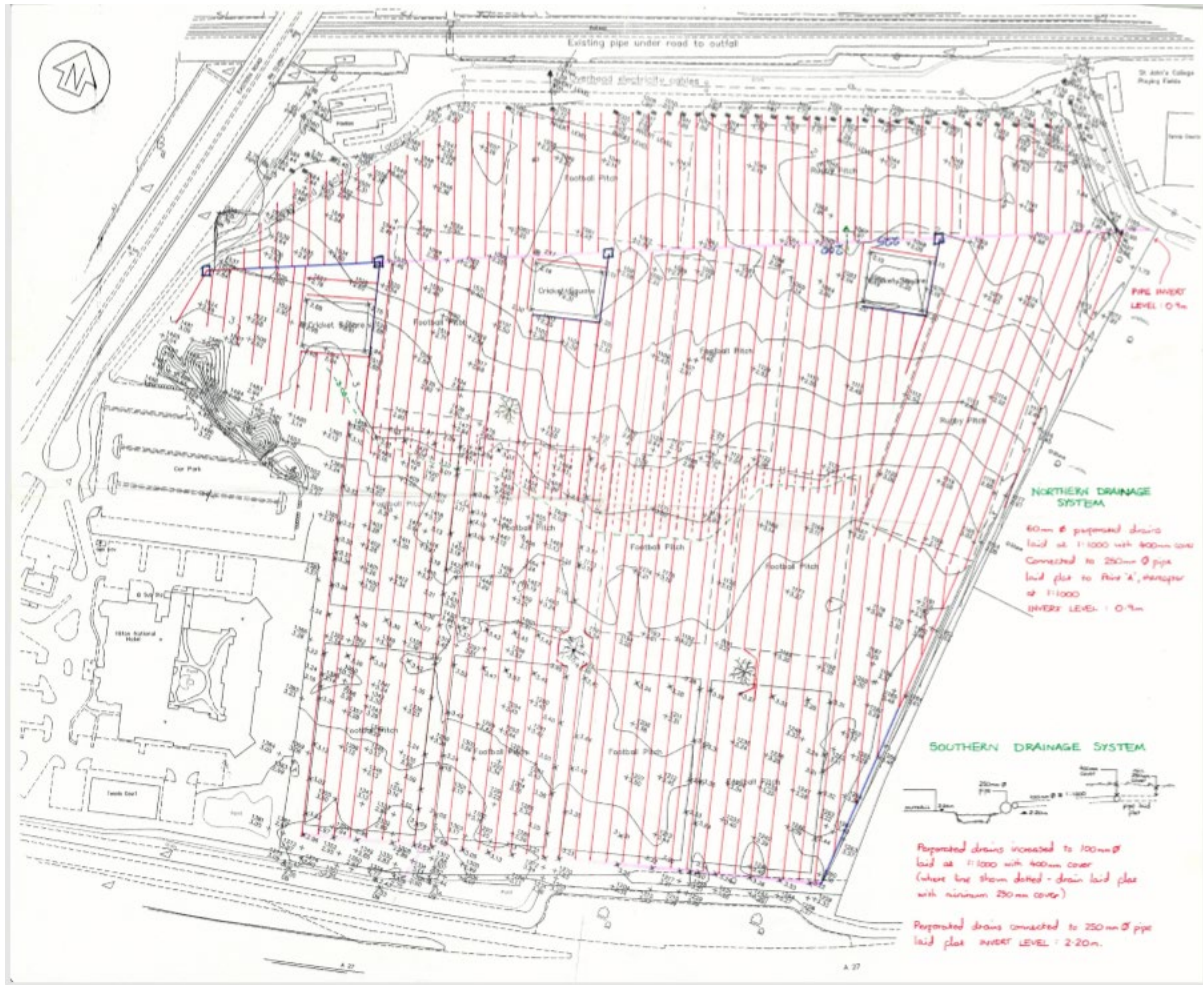
Does Portsmouth City Council have any further observations or concerns regarding the noise assessment presented in the Environmental Statement in respect of the construction and operation of the Optical Regeneration Station buildings at the Fort Cumberland car park? Has enough information been provided to satisfy the Council that any noise emanating from the buildings can be mitigated effectively?

- 3.3 PCC continues to work with the applicant to reach common ground in respect of management of noise, both during the construction phase and the operation of the ORS at Fort Cumberland. An update will be provided to the Hearing of 15<sup>th</sup> December 2020

#### REF 7. Socio-economic assessment

p) Could the Applicant clarify the answer to ExQ1 OW1.12.12 in relation to any existing subsurface land drainage systems that may exist in the Farlington Playing Fields? Does the submission in response that 'All existing drainage systems should be identified and plotted, incorporate into new drainage designs – if new drainage required' allow for any damage and restoration of such systems? If so, what would the projected timescale be for effective restoration? What certainty can be expected that any damage will be made good when this statement is prefaced with 'should be'? Please could Portsmouth City Council describe 'its own purpose-built drainage system' mentioned in its Local Impact Report?

- 3.4 The drainage system was installed in 2003 and cost approximately £228,000. Plan HPSC3733 (below) shows proposed main drainage lines including levels. The pipes are laid at extremely low falls, flat in some sections according to the annotated drawing due to the site levels and drain runs across such a large area. This adds to sensitivity over large vehicle movements across the site and potential impacts.



3.5 The second plan (Drawing No. XEV002-DR2) also shows the completed scheme without levels but also includes the drainage outlets in the south west corner and North east corner, and pipe sizes which vary between 60mm and 250mm.



3.6 The drainage scheme is extensive and covers the whole field, with drainage runs at approximately 8m centres (note the attached plans are not to scale). Due to this coverage PCC do not consider that adequate consideration has been given to the time required for and complexity of reinstatement of the drainage system within the applicant's indicative timetable.

#### 4. **CONCLUSIONS**

4.1 PCC wishes to reserve its position to make additional submissions in light of any new evidence and the applicant's responses.