

Stephen Cornwell

Subject: FW: Aquind Interconnector dDCO
Attachments: Winchester City Council Comments on General Approach to Environmental.docx

APPENDIX A

From: Stephen Cornwell
Sent: 14 February 2021 17:34
To: 'Jarvis, Martyn' ; Catherine Knight; Nicholas Parker
Cc: Kevin.Roeton Peter, Lara
Subject: RE: Aquind Interconnector dDCO

Martyn

Thank you for the comment paper.

We have looked through it and have a number of comments that we can pass back to you.

Happy to drop definition of commissioning in favour of using operational. Does Employment and Skills Strategy not talk about commissioning?

Article 9 we will obviously agree to disagree and see how it goes next week

Regarding Articles 41 and 42 we still think there is merit in discussing why replacement is not in there. The idea that a landowner may take a financial payment and accept or put in place a less valued feature like a post and wire fence is not acceptable to us.

Requirements

- 2 happy to change wording to refer to operational
We still want to ask for the no start until French side approved
- 3 We still want to be notified of how the work programme will be approached.
We have the Lovedean to Hambledon Road section and the commitment to submit a scheme for the road work to ensure the various road gangs keep apart does not apply to us.
- 4 Fixing HDD5 launch compound has resolved this issue. We are however pressing for a conclusion on the micro siting option
- 6 I am not sure piling includes the foundation work like the slab
whereas foundation would include piling
Regarding the access at Lovedean I know it is not in our area. I am not clear if you are saying that it will be brought forward "solely" through a S278 agreement with HCC and does not need any approval through the DCO process?

We still think the addition to exempt future lights such as bulkhead lights attached to elevations needs to be included

7, 8 & 9 We still think there are still questions over these three requirements and the cross referencing that we highlighted. I attach a note that offers a skeletal outline of what we

think they should cover which presents a simple clean division of responsibilities

10 If the main Lovedean access is now achieved by a S278 agreement what access points are covered by this requirement?

WCC would deal with any planning application for an access so why change a well-accepted practice?

15 We still think the CEMP needs to limit its scope to the construction phase.

16 agreed

22 I am still finding the new version difficult to understand. I am not entirely sure I understand what it means to address, compounds or the cable installation work or both?

Where does it say a scheme needs to be submitted? How about the following:

Unless required to facilitate the implementation of the approved scheme in another phase of the development, any service compound or section of the cable route shall be reinstated in accordance with a scheme and to a timetable approved in advance with the relevant planning authority.

I do not understand the need to refer to not reinstating beyond

existing condition.

24 Decommissioning

We still intend to pursue this and have undertaken some fine tuning to the wording. I have left it in colour so you can see the additions over the last version you will have seen.

In the event of a written request from the relevant planning authority to the operator and owner, seeking details of the electricity imported or exported through the converter station over the previous period of 4 years, the operator will respond in writing within 21 days.

Should the Converter Station be found not to have import or export any electricity for a period in excess of 3 years and the operator has not agreed otherwise with the relevant planning authority, the applicant will within 3 months of a written request by the local planning authority, submit full written details for approval by the relevant planning authority of a decommissioning and restoration scheme. The submitted details will identify those parts of the development to be removed, those to remain or to be left in the ground and the intended use of the land occupied by the Converter Station and access road. The details will also include the methodology to be adopted and the wider environmental implications of the proposed work and a timetable for its completion. Finally, details of the provision for the future maintenance of any retained vegetation will also be included. The approved scheme will then be implemented in accordance with the approved details

The following is new requirement that we are working up. I think Catherine may have some thoughts on fine tuning it but just to give you a flavour of our thinking

Decommissioning Bond

.—(1) The authorised development landwards of MHWS must not be commenced and the undertaker must not exercise the powers in article 3 until:

(a) security a bond to the value of not less than £60 million has been provided in respect of the potential cost of decommissioning the development within Work No2; and

(b) the Secretary of State has approved the security in writing.

(2) The security referred to in paragraph (1) may include, without limitation, any one or more of the following:

(a) the deposit of a cash sum;

(b) a payment into court;

(c) an escrow account;

(d) a bond provided by a financial institution;

(e) an insurance policy;

(f) a guarantee by a person of sufficient financial standing (other than the undertaker).

(3) The bond shall be secured in such a way that allows Winchester City Council to be able to call on that money in the event that the owner of the development goes into receivership.

Again some fine tuning

Employment and skills plan

No phase of the authorised development may commence or undertaken, any onshore site preparation work be undertaken until an employment and skills plan in relation to the authorised development (which accords with the outline employment and skills strategy) has been submitted to and approved by the relevant planning authority.

(2) The employment and skills plan must identify opportunities for individuals and businesses to access employment and supply chain opportunities associated with the construction, operation and maintenance of the authorised development, and the means for publicising such opportunities. In addition, it must also identify opportunities to engage with students at educational establishments within the local area which serve the population of the host authorities to facilitate a

greater understanding of renewable energy and offer information on the range of future career opportunities that the project is reliant upon to be completed.

Finally, I note someone else has asked about fees payable for an requirement submission. I had been looking for this in the fees regulations and meant to ask if you knew if there is a specific reference to them somewhere or as suggested now by AN other should there be a specific reference in a requirement/article or schedule?

If you want to talk anything through please let me know.

Steve Cornwell

WCC