

From: [Stephen Cornwell](#)
To: [Aquind Interconnector](#)
Subject: Aquind Interconnector EN020022:
Date: 28 April 2023 13:55:41
Attachments: [image001.jpg](#)
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[Appendix B Plan showing Aquind and Enso application sites..docx](#)
[Secretary of State response April23.pdf](#)
[Appendix A Lovedean Proposed Solar Farm Site Plan.docx](#)

EN020022: AQUIND Interconnector

Dear Sir,

Please find attached a response by Winchester City Council to the letter from the Secretary of State dated 3 March 2023.

Stephen Cornwell
Lead Officer Aquind Interconnector

Winchester City Council
Colebrook Street
Winchester, SO23 9LJ

Tel:
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Secretary of State for Energy Security & Net Zero
1 Victoria Street
London
SW1H 0ET
United Kingdom

Sent by email only

28 April 2023

Dear Sir

Planning Act 2008 and The Infrastructure Planning (Examination Procedure) Rules 2010

Application by AQUIND Limited for an Order granting Development Consent for the proposed AQUIND Interconnector (“the AQUIND Interconnector project”)

Secretary of State Re-determination of Application: Request for Information

Unique Reference: EN020022

I refer to your letter dated 3 March 2023 seeking further information from 5 named parties on 4 specific issues. The deadline for submissions was originally set at midnight 31 March 2023 but this has been extended to midnight 28 April 2023. Your letter of 3 March 2023 indicates that responses from interested parties will also be taken into account and it is in that capacity that Winchester City Council wishes to make the following comments.

Issue one

Consideration of Alternatives

- 1.1 Winchester City Council does not have any comment to make at this time on the Mannington issue.
- 1.2 Whilst not wishing to prolong the consideration of this scheme, information has come to hand that the Aquind Interconnector landfall location on the

Normandy region coastline has changed. If this is correct, this does raise the question if the landfall location on the south coast should be re-considered, or at the very least that the choice of Eastney (and by association Lovedean) are re-affirmed in the context of the guidance set out in EN-1 (paragraph 4.4.3).

- 1.3 The application document (ExA APP-117), ES Chapter 2 Alternatives paragraph 2.4.2.6 refers to Fecamp as the landfall in France. This is a location 40km northeast of Le Havre. It is now understood that the landfall point has move some 50km further to the northeast to Hautot sur Mer. This is a location that lies west of Dieppe.
- 1.4 The desire to restrict the length of the marine cable is a theme in the application and noted by the Judge in the recent court case. If this information is correct, it does raise the question if the landfall location on the south coast should be re-considered or at the very least that the choice of Eastney (and by association Lovedean) is re-affirmed in the light of the changed circumstances.

Issue 2

North Portsea Island Coastal Defence Scheme

- 2.1 The Council does not wish to make any comment on this issue.

Issue 3

French Licences and Consents

- 3.1 During the Examination process, The Council propose that if the application was approved, that the Secretary of State imposed a Grampian type Requirement that there was no start on the UK site until all the necessary French consents had been obtained. The actual wording of the proposed Requirement stated:

'No phase of the development within the UK boundary above MHSW shall commence (including any onshore site preparation work) before the applicant has provided the relevant local authority for that phase, written confirmation that the whole of the scheme (including the French side) has obtained the approvals listed in section 9 of the Statement of Reasons. The submitted details will list the approvals, the authorising body, the date they were obtained and any relevant reference number.'

- 3.2 This was considered in the ExA report to the Secretary of State at 11.3.59. The primary reason that this proposal was rejected by the ExA appears to be that a developer would not undertake such a substantial scheme without the ability to fully complete it (11.3.62). The financial situation of the applicant was noted during the Examination. This means in their present condition they are unable to implement any scheme on their own and must seek funds from other sources, engage in a partnership or sell any consent on to another party to implement. The risk is therefore present that to keep any permission alive a start may be made on the UK side. Given these circumstances, combined

with the need to obtain consents in another country, which may be proving more onerous than originally envisaged, the Council considers that the benefits of a Grampian type Requirement outweighs any constraints that such a requirement may impose.

- 3.3 If the Secretary of State is minded to approve the application, the Council requests that he consider imposing the above Requirement.

Issue 4

Environmental Information.

It is considered that the following is brought to your attention.

4.1 New Planning Application

A planning application has been submitted for a proposed solar farm with a battery storage facility on land that lies to the north, west and south of the Lovedean Sub Station. The application was received on 18 February 2022. The WCC application reference number is 22/00447/FUL. The full description of the application is:

Establishment of solar farm and battery storage facility with supporting development, on 4 separate parcels of agricultural land located to the north, south and west of the National Grid Lovedean substation, Denmead Farm Edneys Lane Denmead Waterlooville Hampshire PO7 6JN.

This is a link to the Council web site, which contains all the application documents:

<https://planningapps.winchester.gov.uk/online-applications/simpleSearchResults.do?action=firstPage>

Attached to this letter as appendix A is a copy of a plan that shows the extent of the application site.

The solar farm scheme relates to land that falls within both the Winchester City Council area and land that falls within the East Hampshire District Council area.

The EHDC reference number is 58038/003

At the present time the Council is not in a position to indicate a timescale for the consideration of this application, or its likely outcome.

- 4.2 The solar farm scheme developer has sought to avoid any overlap between the two schemes and has intentionally drawn their red line inside the Aquind application site boundary to avoid such an overlap. This is most readily apparent on the field boundaries where the solar farm boundary has been drawn several metres inside the hedgerows that Aquind intend to exercise a degree of control over and are annotated as New Landscape Rights on their Land Plan sheet 1 of 10 revision 05 (REP7-003). For assistance, attached as appendix B is a copy of a plan that shows the two application sites.

Notwithstanding the above intention, the proposed Enso solar farm scheme does overlap the proposed Aquind scheme in a number of aspects and these will be considered below.

4.3 HGV Traffic movements.

The Hampshire County Council Highway Engineer proposed a maximum number of HGV movements associated with the Aquind development at the Lovedean Converter Station site. In the event that both Aquind and the solar farm scheme gained approval and that their construction periods coincided, then there is the possibility that the maximum number of HGV movements on the local roads would be exceeded and there are conflicts between the separate Construction Traffic Management Plan in operation.

All parties are aware of this possibility and have recognised that this scenario needs to be avoided by some form of arrangement that caps the maximum number of HGV movements to operate within the agreed Aquind limits. A dialogue has been ongoing between all the parties (Aquind, Enso, the Highway Authority and the two district councils of East Hampshire and Winchester) on how best to achieve this. The intention is to include the need for both schemes to have regard to the maximum number of HGV movements. In the event that the solar farm scheme is approved the intention is to impose a negative Grampian type condition. A decision on the solar farm scheme is still some way off, but at the present time the following is a draft condition worked up by The Council of the type anticipated. It is still under discussion with all the relevant parties:

In the event that the AQUIND Interconnector DCO is granted, no commencement of the Solar Farm development hereby permitted shall be undertaken until a construction traffic management plan which provides for the joint arrangements for construction traffic management for both the development authorised by this planning permission and the AQUIND Development Consent Order, shall be submitted to and agreed in writing with the local planning authority. The joint arrangements will set out the details and methodology for joint co-ordinated action that will ensure that the maximum number of HGV traffic movements (set out below) is not exceeded. The approved details shall be complied with thereafter at any time when the construction periods for the development of the solar farm and the AQUIND Interconnector overlap. The combined maximum number of HGV traffic movements from both the development of the solar farm and the Aquind Interconnector that may take place on any one day shall not exceed 71 two way HGV movements (142 in total) of which those from the Solar Farm development shall not exceed more than 15 two-way HGV movements (30 in total) per day.

It has also been recognised that a similar approach to setting a threshold on HGV movements should be applied in the event that the DCO is granted. Accordingly, some adjustment to Requirement 17 (Traffic Management) has

been under consideration. The following has been discussed and agreed by an email exchanges between Aquind, the Highway Authority and the two district councils (East Hants & Winchester):

A new part (5) is proposed on the end of Requirement 17:

Construction traffic management

17.—(1) The construction of any phase of Work No. 2 (bb) and the undertaking of any onshore site preparation works in connection with Work No.2 prior to construction of Work No.2 (bb) must not begin for the purposes of section 155(1) of the 2008 Act until a construction traffic management plan (in accordance with the framework construction traffic management plan) relating to that those works been submitted to and approved by the relevant highway authority.

(2) No phase of the authorised development landwards of MHWS may commence until a construction traffic management plan (in accordance with the framework construction traffic management plan) relating to that phase has been submitted to and approved by the relevant highway authority (in consultation with Highways England in so far as the relevant construction traffic management plan relates to the strategic road network managed by them).

(3) The construction of any phase of the authorised development landwards of MHWS must be carried out in accordance with the construction traffic management plan approved in relation to it.

(4) Notwithstanding anything contained in any approved construction traffic management plan, Work No. 2 (bb) (access junction and associated gated highway link) shall not be used for more than 71 two-way HGV movements (142 in total) per day in connection with the construction of the authorised development landwards of MHWS.

(5) In the event that the construction of the Solar Development is concurrent with the construction of the authorised development landwards of MHWS, the total number of HGV movements in connection with the authorised development landwards of MHWS which enter into the area shown as Work No.2 on the works plans and in connection with the construction of the Solar Development shall not exceed 71 two-way HGV movements (142 in total) per day.

End

A new definition of Solar Development will be inserted into the requirements at Schedule 2 para 1(1) as follows: "Solar Development" means where granted planning permission, the development approved pursuant to the applications with reference 22/00447/FUL and 58038/003 by Winchester City Council and by East Hampshire District Council (respectively).

4.4 Physical Overlap Between the Two Schemes

The solar farm red lined application site physically overlaps the Aquind site in the following areas:

- a. The main access to the solar farm site will be via Broadway Lane Denmead Farm Access. Aquind has identified this as an access to the land at pre commencement stage.
- b. The proposed solar farm cable route leading to the Lovedean sub station crosses the proposed Aquind access roadway.
- c. The proposed solar farm cable route that would take the power output from the two parcels of land off Old Mill Lane and which runs down Old Mill Lane would leave the highway and enter the field at The Crossways where Old Mill Lane becomes Denmead Lane. The solar farm internal cable route would cross the north south route of the Aquind cables.
- d. The solar farm scheme proposes to use the two existing field entrances off Old Mill Lane. The solar farm red lined application site does included sections of hedgerow adjoin these two field accesses. Aquind propose to protect and manage this hedgerow as a screening feature.
- e. In addition to the above, the solar farm proposal has included a length of Old Mill Lane within its red line to enable a cable to be laid in the road to connect those solar generating sites to the schemes new sub station. This red line runs down the hedgerow that Aquind propose to protect and manage as a screening feature.

For clarification, the above is a complete list and for the avoidance of any doubt, points (a) and (b) lie within the East Hampshire District Council area.

Regarding point (a), there is a proposal (not finalised) that Aquind would use this as their pre-construction access to get onto the land to start the establishment of their new access and the new roadway that would lie to the north.

Concerning points b and c, these are viewed as technical matters in terms of which cable is laid first and the separation depth that needs to be created between them.

Regarding points (d) and (e), the Aquind scheme identifies the hedgerows on the eastern side of Old Mill Lane as contributing to the screening of the main site and it is proposing to take a degree of control over those features as part of their "New Landscape Rights" initiative. These features are shown on the Lands Plans Sheet 1-10 revision 05 (REP7-003).

Enso have stated in email exchanges with the Council that it is not their intention to remove or cut back any of the hedgerows adjacent the two field entrances. Accordingly, these hedgerows would not be affected by the proposed Solar Farm scheme.

The use of the hedgerow on the eastern side of Old Mill Lane as the red line to the application site is not considered to imply any intention to affect that feature as part of the laying of the cable in the road. Its use is viewed as simply indicating the highway limits on that side of the lane.

4.5 Cumulative impact

The Aquind submission regarding cumulative landscape impact assessment (ES Vol 1 Chapter 29) (APP-144) does need updating to reflect the potential presence of the Enso solar farm around the proposed Converter Station.

4.6 Emerging policy

Both Winchester City Council and Denmead Parish Council are currently working on new/updates to their respective local plans.

The WCC document (Winchester District Local Plan 2018-2039) is still at an early stage. In any event, there are no proposals that would change the planning policy framework approach to the Aquind development.

Denmead Parish Council is also reviewing its Neighbourhood Plan to extend its life through to 20239. This document is not proposing to change the local policy background for the Aquind site.

4.7 West Waterlooville Development Area

Whilst there have been further applications submitted and approved within this area, none are considered to have any impact on the proposed cable route along the A3 or B2150 Hambledon Road.

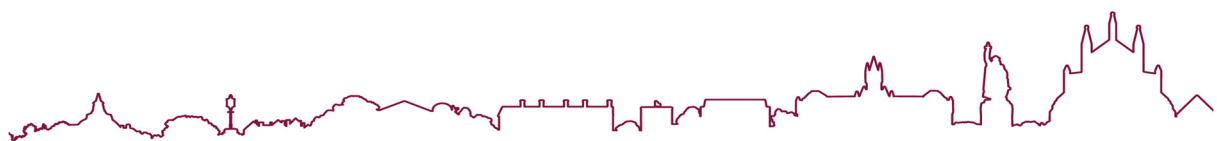
4.8 Review NPS

The Council notes the ongoing review of the energy National Policy Statements with the further consultation exercise commencing 30 March through to the 25 May 2023 and is content to leave any influence this review may have on the application to the Secretary of State.

If any clarification on the above matters is required, please do not hesitate to get in touch.

Yours faithfully

Julie Pinnock BA (Hons) MTP MRTPI
Service Lead Built Environment

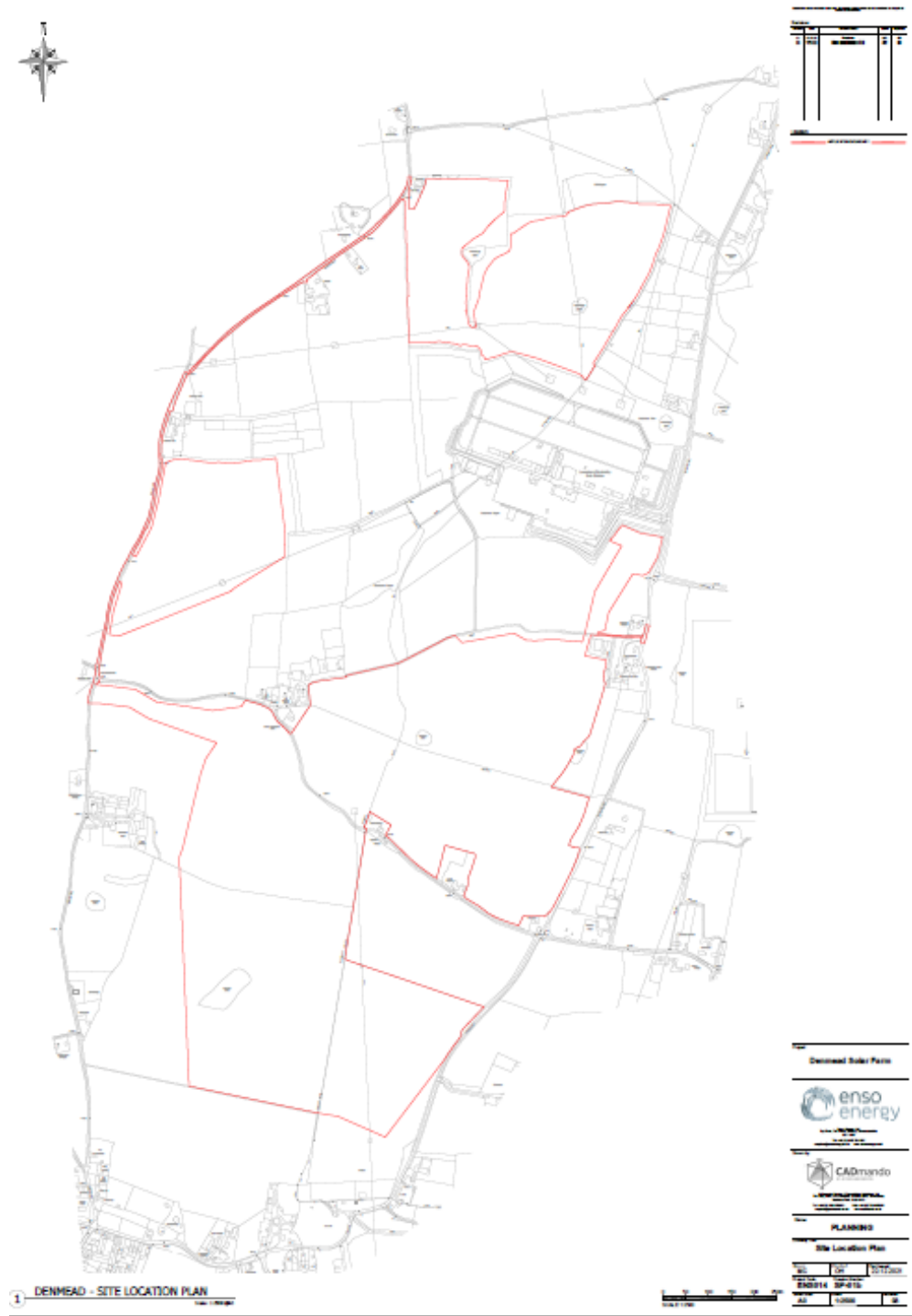


APPENDICIES

- A Plan showing the Lovedean Proposed Solar Farm site.
- B Plan showing the Aquind Interconnector & the Solar Farm sites.

APPENDIX A

Lovedean: Proposed Solar Farm Site Plan

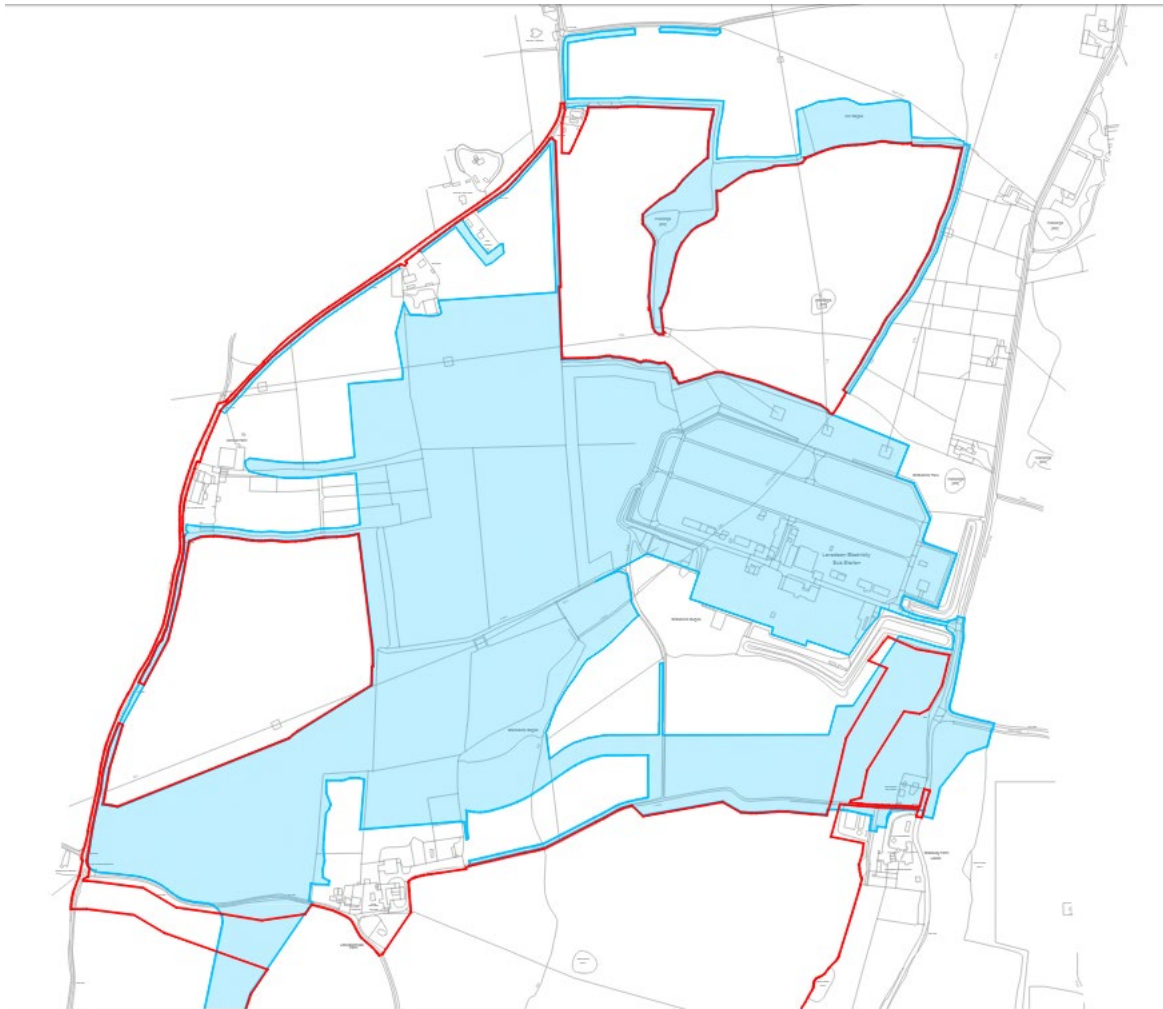


APPENDIX B

EXTRACT FROM ENSO ENERGY DOCUMENT: LANDSCAPE DESIGN EVOLUTION REPORT

PLAN SHOWING EXTENT OF AQUIND SCHEME AND SOLAR FARM

Plan in two parts:



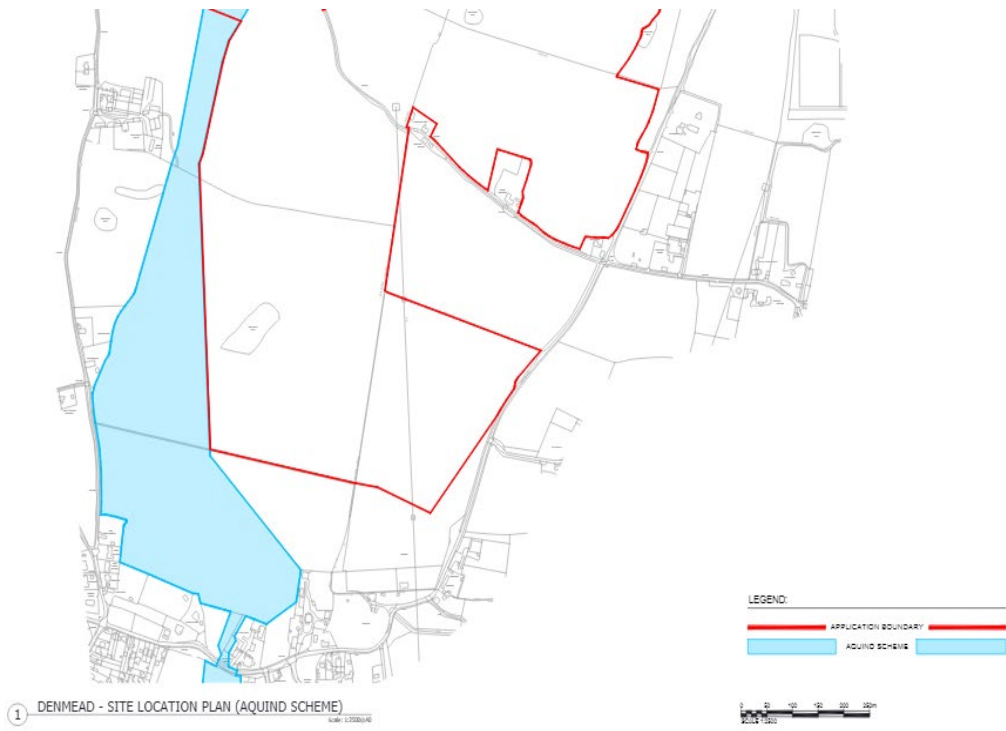


Figure 3: AQUIND Interconnector project boundary in relation to the site boundary