

AQUIND Limited

AQUIND INTERCONNECTOR

Environmental Statement – Volume 3 – Appendix 22.3 Consultation Responses

The Planning Act 2008

The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 – Regulation 5(2)(a)

The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

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APPENDIX 22.3 CONSULTATION RESPONSES

1.1. PRE- PIER CONSULTATION

1.1.1.1. This section outlines the responses received from statutory consultees before the publication of the PEIR.

Consultee	Date and Method of Consultation	Discussion	Summary of Outcome of Discussions
Hampshire County Council	response 26	Further information required regarding cable laying proposals, carriageway widths and appropriateness of routes.	Details of construction methodology are included in Chapter 3 - Description of the Proposed Development. An assessment of the Onshore Cable Corridor has been included within Chapter 21 of the EIA.
		Consideration should be given to the committed development in the area, ensuring baseline conditions are accurate.	All traffic modelling has been undertaken using the SRTM and a future year of 2026. This includes all consented and local plan development within the study area.
		A Transport Assessment or Transport Statement will be required.	This has been undertaken to support the DCO submission.

1.2. POST PIER CONSULTATION

1.2.1.1. This section outlines the responses received from statutory consultees following the publication of the PEIR. These responses have been considered within the EIA.

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1.2.2. BUCKLAND DEVELOPMENT LTD

Discussion	Summary of Outcome of Discussions
Construction programme should not prejudice development of Land North of Highbank Avenue. This will be accessed from the A3 London Road opposite Downside Road.	Traffic management proposals along A3 London Road will not prejudice development. Details of side-road / business access proposals are included within the FTMS.

1.2.3. DENMEAD PARISH COUNCIL

Discussion	Summary of Outcome of Discussions
Construction traffic should use the A3(M) rather than local roads.	Construction traffic will use the A3 (M) to access the local road network as prescribed within the CTMP.
The site will create additional traffic purely by being there.	Once operational the convertor station will generate very low volumes of traffic for maintenance purposes only.
Why can't the A3(M) form part of the Onshore Cable Corridor?	Use of the A3(M) is not possible without agreement from Highways England. Traffic Management requirements on such roads (lane closures) would lead to significant disruption to the Strategic Road Network, with knock-on repercussions to the local road network as a result of traffic redistribution.
Concerns regarding access to residential properties.	Access to residential properties will be maintained where possible but some vehicular restrictions will be required when cable installation is underway immediately outside an access. This will impact individual properties for a maximum of 1-2 weeks per circuit, during which time pedestrian and cycle access will be retained at all times.

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Discussion	Summary of Outcome of Discussions
Forest Road / Hambledon Road is a 'rat run' for commuter traffic	Impacts on Hambledon Road and Forest Road have been fully assessed within the TA.
Concerns regarding landscape and visual impacts at Converter Station	The Applicant has met with WCC, EHDC and SDNPA on several occasions since the Statutory Consultation to discuss Converter Station design and landscaping. This has culminated in a set of Design Principles and Landscape Principles being drafted upon which the detailed design and landscaping mitigation will be based. Details of the discussions and principles are set out in the Design and Access Statement ("DAS").



1.2.4. EAST HAMPSHIRE DISTRICT COUNCIL

Discussion	Summary of Outcome of Discussions
It is questioned whether a 'negligible' impact is a reasonable reflection of the impact of a 25% increase in traffic on Lovedean Lane (albeit this is during peak construction). Lovedean Lane is a predominantly residential road and Day Lane is a rural lane with a width unable to accommodate two-way HGV flow. The impact of the additional traffic during construction is considered to be significant and under played by the PEIR.	Impact is based upon PEIR assessment criteria. Further assessment has been completed within the EIA and associated Transport Assessment.
The Construction Traffic Management Plan should include details of the Converter Station access arrangements and the timing of deliveries / contractors to avoid a situation of vehicles arriving early and being parked on local roads. EHDC would like to maintain dialogue with AQUIND as these documents evolve.	CTMP provides detailed as required.

1.2.5. GRAINGER

Discussion	Summary of Outcome of Discussions
The Red Line Boundary should fall outside of all Grainger Land so as not to prejudice the delivery of future development at the West of Waterlooville MDA (Berewood) and Blue Star Land, which is allocated for residential development under the Havant Local Plan.	The final Order Limit does not include Grainger land.
Construction programme / works should not disrupt proposals for Ladybridge roundabout, due to commence in Spring 2020 and be fully constructed by November / December 2020.	This will be fully considered as part of the construction programme once a contractor has been appointed.

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1.2.6. HAMPSHIRE COUNTY COUNCIL

Discussion	Summary of Outcome of Discussions
Impact on A3 London Road needs to be quantified	Impact on A3 London Road is fully assessed within the TA.
Details of the Converter Station Access are required	Site access options have been submitted to HCC for review. The proposals are also included within the TA.
Confirmation on proposed delivery mechanism for cables across Anmore Road and site access into Kings Pond Meadow is required	Details will be included within the PD. The cables will be installed via trenching. Access to Kings Pond Meadow will necessitate works to the existing farm access west of Soake Road.
Section 4 – Need to subdivide to account for this sections' length and varying highway characteristics	Section 4 has been subdivided accordingly in the FTMS which details the proposed traffic management for each sub-section.
The impact of the opportunity to take the Onshore Cable Corridor away from the A3 London Road onto parallel service roads / minor residential roads (such as Hambledon Parade) have not been fully considered.	Full details of traffic management proposals for parallel service roads / minor residential roads (including Hambledon Parade) are included within the Traffic Management Strategy.
Opportunities for avoiding the A3 London Road by utilising the West of Waterlooville MDA site have not been included.	The Applicant has worked with Grainger to discuss this option, ultimately Grainger consider the risks to their programme delivery would be unacceptable to allow the Applicant to utilise its land.

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Discussion	Summary of Outcome of Discussions
Bus lane and bus stop closures along the A3 star corridor are considered to have a significant impact on bus journey times / reliability. Mitigation may be required such a direct funding of additional services to avoid undermining efforts of the Transforming Cities Fund (TCF).	AQUIND has met First Group who do not consider the works of particular concern compared to other undertakers works. Mitigation will be provided where possible through the implementation of bus priority as part of the traffic management proposals. Where temporary bus stop closures are required an alternative stop will be provided where possible. TCF bids do not yet constitute committed schemes and therefore cannot be considered in the design of the cable route.
The acceptability of installing cables at the roundabout with Ladybridge Road must be considered in the context of other projects.	The final Order Limit has taken account of the proposals for Ladybridge Roundabout
Disagree with use of general travel pattern data in the construction phase methodology. Measures should be used to actively reduce single occupancy car trips.	All construction traffic associated with the construction of the Convertor Station will use the designated construction traffic access route included within the CTMP. A Construction Worker Travel Plan has been developed and is included within the CTMP.
Insufficient analysis of the suitability of the access route to the Convertor Station has been undertaken. Specifically, there are concerns regarding the ability of Lovedean Lane to accommodate two-way HGV traffic given its predominately residential nature.	A full assessment has been included within the CTMP.

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Discussion	Summary of Outcome of Discussions
Traffic data analysis is required to confirm the peak periods especially outside schools and sensitive receptors to help clarify the restrictions that should be applied to HGV movements.	Traffic modelling has been completed using the SRTM based on standard AM and PM peak periods. CTMP includes details of construction traffic restrictions.
 The construction traffic access route for the Convertor Station has implications for asset resilience. Elements of the route are unlikely to be of a standard to accommodate the anticipated vehicle loading levels. The applicant must examine this matter further and provide suitable mitigation measures to ensure that: HCC is not left with a maintenance burden and; The highway remains in a safe operational condition both during and beyond the construction period. 	This has been addressed within the CTMP.
AQUIND should take account of the planned works on Lovedean Lane to install a pedestrian island.	Temporary removal may be required to allow access by abnormal loads.
Details of the Internal Road Route should be provided to HCC to ensure it is suitable for construction traffic.	Details included within the PD.
 A CTMP should be produced that considers the following aspects: Mud; Turning of delivery vehicles; Contractors vehicle parking; Suitability of routes to the site; and Mitigation measures. 	Details are included within the CTMP.



Discussion	Summary of Outcome of Discussions
Details of the construction site compound(s) and number of cable gangs will be required.	Details are included within the CTMP.
HCC require confirmation of anticipated vehicular numbers and permanent access arrangements for the operational phase of the Proposed Development.	Details are included within the CTMP.
A CTMP will be required for the decommissioning phase of the Proposed Development.	This has been noted and will be dealt with at the time as necessary.
Confirmation is required of the availability of access to private properties during the installation of the Onshore Cable Corridor.	The proposals for access to residential properties, businesses and side-roads has been included within the FTMS.
Confirmation of the locations for Jointing Bays and Link Boxes are required to ensure they are not situated within highway land.	Due to the need for flexibility, it is not possible to confirm the location of Jointing Bays at this stage.
The TA should not be limited to order limits but assess impacts on the adjoining network, including the following key junctions:	Following scoping discussions, additional traffic modelling has been conducted using the SRTM, with all junctions included within the study area.
 Stakes Road/Stakes Hill Road Roundabout; 	Analysis of the SRTM results has been included within the EIA and TA.
 College Road / Purbrook Road junction; 	
Asda Roundabout;	
• A3(M) junction 3; and	
• A3(M) junction 4.	

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Discussion	Summary of Outcome of Discussions
The TA should assess the potential for traffic redistribution during the installation of the Onshore Cable Corridor and required mitigation.	Following scoping discussions, additional traffic modelling has been conducted using the SRTM, with all junctions included within the study area.
	Analysis of the SRTM results has been included within the EIA and TA.
Highways England should be consulted on the A3(M) corridor	HE have been consulted.
Clarification is sought regarding how the project team have determined the traffic sensitivity of the route. This information should be obtained from Hampshire County Council's New Roads and Street Works Act (NRSWA) team.	The route sensitivity has now been superseded by full analysis of sensitive receptors as detailed within Chapter 22 of the ES.
It is not clear what triggers a road to be considered specifically highly sensitive.	The PEIR sensitivity has now been superseded by full analysis of sensitive
A list of all roads to be assessed and on which of the four criteria they have been triggered for assessment should be provided.	receptors as detailed within Chapter 22 of the ES.
An understanding of the whole construction programme and its impacts throughout should be discussed in greater detail with relevant officers at the highway authority to ensure appropriate coordination within the programme.	Construction programme is included within Chapter 3 of the ES.

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Discussion	Summary of Outcome of Discussions
Details are required on the factors assumed for TEMPRO growth rates and how these have been derived. Confirmation is sought that TEMPRO can accurately assess the impact of the additional development. Manual assignment of trips from the MDA may be a more appropriate method. In addition, confirmation is required on the level of development currently assumed within TEMPRO.	Details have been provided within the TA where appropriate, however the majority of the study area has been assessed using the SRTM.
No details of the TA have been provided.	A full TA has been completed in support of the DCO with the scope and methodology ageed with HCC and PCC prior to submission.
Personal Injury Accident (PIA) Data is considered out of date. Analysis should review whether there are any patterns of accidents which would be exacerbated by construction of the Proposed Development. A particular focus should be applied on the construction traffic route from the A3(M) to Lovedean Convertor Station.	Updated PIA data has been collected and full analysis has been included within the TA.



Discussion Summary of Outcome of Discussions The link sensitivity assessment work Further analysis has been included within does not appear to have considered the EIA, TA and TMS. schools or picked up the Hambledon Parade shops or Purbrook shopping areas. The table in section 5 should be amended to include existing traffic flows for comparison and checking purposes. Clarification is also sought on the type of HGV classes using the routes at present and in the forecast years. Some values are missing from the table and the review has also noted a significant delay on the A3 London Road corridor as a result of the works however no mitigation or acknowledgement of this is made elsewhere within the PIER. **Three Traffic Management categories** Assessment has been superseded by the have been proposed of 'major, moderate TA and EIA. and minor' based on their anticipated impact. The exact definition of these should be provided for clarity. Temporary closures of the A3 London Any closures on the A3 London Road Road are proposed for weekends only will likely be required at night. The FTMS provides full details of the Any works on the A2030, A3 and B2177 communication strategy to be employed. would require comprehensive local consultation which would be outside the consultation process for the DCO application.

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Discussion	Summary of Outcome of Discussions
Legal implementation of cables in the highway	If "made" the DCO will confer on to the Undertaker (and their contractors and agents) the right to carry out street works. The terms of the DCO in this regard are to be discussed to determine how the process may be best effected, including any amendments required to the NRSWA 1991 (for instance in relation to notices and notice periods) to facilitate the works being carried in the most expedient manner. This discussion will be informed by the construction methodology and the traffic management measures proposed.
There are a number of planned highway works within the area primarily as a result of the ongoing build out for the West of Waterlooville MDA site and our traffic management and safety engineering programmes. This includes a significant scheme at Ladybridge Roundabout. The programme dates for these works are broadly consistent with that proposed for this project.	All committed works will be considered as part of the construction programme as appropriate.
No details have been provided on how the presence of the plant and apparatus within the highway will be recorded. Clarification on who is to do this and how it will be made available is required.	If "made" the DCO will confer on to the Undertaker (and their contractors and agents) the right to carry out street works. The terms of the DCO in this regard are to be discussed to determine how the process may be best effected, including any amendments required to the NRSWA 1991 (for instance in relation to notices and notice periods) to facilitate the works being carried in the most expedient manner. This discussion will be informed by the construction methodology and the traffic management measures proposed.

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1.2.7. HAVANT BOROUGH COUNCIL

Discussion	Summary of Outcome of Discussions
The preliminary nature of the information in the PEIR, means that we cannot conclude what the full impact of the works on the A3 would be. Further details are required regarding the traffic management strategy and the subsequent impacts on traffic flow.	
The EIA and accompanying appendices should clearly document in a table any consultations undertaken with regards to the scope of the proposed assessment, including matters agreed/not agreed. Where the scope differs from that requested by the relevant highways authority, the ES should provide justification for the alternative approach. This is as per the Scoping Opinion provided by the Secretary of State on 07/12/18.	Full assessment has been included within the EIA and accompanying Transport Assessment.
Considering the preliminary nature of the information provided in the PEIR and the need to undertake further traffic surveys, it is considered that the assessment of cumulative environmental effects in the EIA would be too late for HBC to influence the proposal.	Full assessment has been included within EIA and accompanying Transport Assessment.
There are several committed works by the Highway Authority, primarily in relation to the West of Waterlooville MDA, including improvements at the roundabout with Ladybridge Road. the construction programme should be coordinated with these to avoid conflict and delay.	All committed works will be considered as part of the construction programme as appropriate.

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1.2.8. HIGHWAYS ENGLAND

Discussion	Summary of Outcome of Discussions
The impact of redistributing traffic to the SRN because of the works associated with the installation of the Onshore Cable Corridor needs to be fully assessed. This includes the impact to junctions 2, 3, 4 and 5 of the A3(M) and their associated slip roads. Such matters are considered important from the perspective of maintaining network resilience and journey time reliability.	Full assessment has been included within the EIA and accompanying Transport Assessment.

1.2.9. HORNDEAN PARISH COUNCIL

Discussion	Summary of Outcome of Discussions
The anticipated levels of construction traffic will potentially give rise to significant congestion along the A3 corridor, in the village centre and on Lovedean Lane. A traffic management plan will need to be in place to mitigate any impacts.	Full assessment has been included within the EIA and accompanying Transport Assessment.

1.2.10. PORTSMOUTH CITY COUNCIL

Discussion	Summary of Outcome of Discussions
Wider network assessments of the impact of the proposed traffic management are required.	Full assessment has been included within the EIA and accompanying Transport Assessment using the SRTM.

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Discussion	Summary of Outcome of Discussions
The scale of any delays needs to be quantified to understand the likely impact to emergency services and how to respond accordingly.	Full assessment has been included within the EIA and accompanying Transport Assessment using the SRTM.
Reduction in capacity on the A2030 Eastern Road due to roadworks would reduce resilience on an already strained network. It is questionable how this could be mitigated.	Impacts have been fully assessed within the Transport Assessment. The construction programme will aim to minimise impacts by scheduling outside of busy periods, including use of night-time works.
The Onshore Cable Corridor uses mostly classified roads that form a key corridor to the mainland. It is expected that motorised and non-motorised users will be significantly affected.	Further assessments on all users has been included within the EIA and Transport Assessment.
It is unlikely that the proposed working hours of 07:00-19:00 will be permitted. Planned works on traffic sensitive routes are normally only allowed during off-peak hours (09:30-15:30).	The FTMS provides details of the construction programme for the Onshore
Portsmouth also operates several works embargoes coinciding with major events, Bank Holidays and for the entire month of December. Only emergency works will be permitted during such times. The proposed works is likely to clash with committed schemes being delivered within Portsmouth including those associated with the Transforming Cities Fund.	Cable Corridor, including how events and other times of year will be avoided to minimise impacts.
The routing of abnormal loads carrying the 50T cable drums from the Ferryport through the city centre would disrupt traffic and bus services even during off peak hours.	It is not proposed to route cable drum deliveries thorough the city centre. Instead they would be routed along the M275 and A27 Havant Bypass. Consideration for abnormal loads will be given in the EIA.

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Discussion	Summary of Outcome of Discussions
A detailed Construction Traffic Management Plan would be required, tailored for each phase. This would set out the Traffic Management requirements and associated drawings which will need to be agreed by the Highway Authority and Colas.	A Construction Traffic Management Plan has been completed for the DCO.
Where roads closures are required, access for residents and business should be retained at all times.	Access to residential properties will be maintained where possible but some vehicular restrictions will be required when cable installation is underway immediately outside an access. This will impact individual properties for a maximum of 1-2 weeks per circuit, during which time pedestrian and cycle access will be retained at all times.
Coordination is required between contractors to avoid any unnecessary delays. The Construction Traffic Management Plan should detail how this would work and who will ultimately be responsible.	A Construction Traffic Management Plan has been completed for the DCO.
The City Council is currently in receipt of ministerial directives from DEFRA with regards to Air Quality in Portsmouth. Whilst the areas subject to these directives are not located along the proposed Onshore Cable Corridor, it is likely that traffic redistribution could affect them (A3 & A2047 corridors) and exacerbate matters. Therefore, alternative routes for the Onshore Cable Corridor should be considered.	Further assessment have been included as part of the Air Quality Chapter in the EIA.



Discussion	Summary of Outcome of Discussions
The applicant will need to mitigate substantial impacts on the transport network as per paragraph 5.13.9 in The Overarching National Policy Statement for Energy (ONPSE EN-1). This could include funding contributions to bring forward proposed capacity enhancements for the Park and Ride at Tipner.	Full assessment of impacts has been included within EIA and accompanying Transport Assessment using the SRTM.
Under the New Roads and Street Act, all works on the public highway are required to have notices served correctly on the Street Works Register with appropriate traffic regulation orders. Colas highlight a need for collaborative working/programming.	This has been discussed with PCC and HCC.



1.2.11. SOUTH DOWNS NATIONAL PARK

Discussion	Summary of Outcome of Discussions
The impact of the Monarch's Way Long Distance footpath has not been sufficiently recognised.	An assessment of Monarch's Way has been included in the EIA.

1.2.12. WINCHESTER CITY COUNCIL

Discussion	Summary of Outcome of Discussions
Within the PEIR there were some inconsistencies relating to the terminology that had been used and data relating to the duration of the installation of the Onshore Cable Corridor.	Clarification has been provided. PEIR terminology referred to construction durations per circuit.
Considered the preliminary nature of the information contained with the PEIR, further detail is required on the assessment of impacts arising from the proposed traffic management. In particular additional clarification is required regarding the proposed traffic management along the B2150 Hambledon Road and its impacts.	A full assessment of the impacts of the proposed traffic management along the B2150 Hambledon Road has been provided in the EIA and associated TA.

