



AQUIND Limited

AQUIND INTERCONNECTOR

Applicant's Responses to Relevant Representations

The Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010 – Rule 8(1)(c)

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1. INTRODUCTION

1.1. PURPOSE OF THIS DOCUMENT

- 1.1.1.1. AQUIND Limited (the Applicant) submitted an application for the AQUIND Interconnector Order (the Order) pursuant to Section 37 of the Planning Act 2008 (as amended) (the PA2008) to the Secretary of State (SoS) on 14 November 2019 (the Application). The Application was accepted by the Planning Inspectorate (PINS) on 12 December 2019, with the Examination of the Application commencing on 08 September 2020.
- 1.1.1.2. The Application seeks development consent for those elements of AQUIND Interconnector (the Project) located in the UK and the UK Marine Area (the Proposed Development).
- 1.1.1.3. The Project is a new 2,000 MW subsea and underground High Voltage Direct Current (HVDC) bi-directional electric power transmission link between the South Coast of England and Normandy in France. By linking the British and French electric power grids it will make energy markets more efficient, improve security of supply and enable greater flexibility as power grids evolve to adapt to different sources of renewable energy and changes in demand trends. The Project will have the capacity to transmit up to 16,000,000 MWh of electricity per annum, which equates to approximately 5 % and 3 % of the total consumption of the UK and France respectively.
- 1.1.1.4. The Proposed Development includes:
- HVDC Marine Cables from the boundary of the UK Exclusive Economic Zone to the UK at Eastney in Portsmouth;
 - Jointing of the HVDC Marine Cables and HVDC Onshore Cables;
 - HVDC Onshore Cables;
 - A Converter Station and associated electrical and telecommunications infrastructure;
 - High Voltage Alternating Current (HVAC) Onshore Cables and associated infrastructure connecting the Converter Station to the Great Britain electrical transmission network, the GB National Electricity Transmission System (NETS), at Lovedean Substation; and
 - Smaller diameter Fibre Optic Cables (FOC) to be installed together with the HVDC and HVAC Cables and associated infrastructure.

- 1.1.1.5. The registration of Interested Parties (IPs) began on 2 January and closed on 19 February 2020. During this period, a total of 199 Relevant Representations (RRs) were received by the Planning Inspectorate (PINS). Four additional submissions were accepted at the discretion of the Examining Authority (ExA). The RRs were published on PINS' website on 27 February 2020.
- 1.1.1.6. This document is submitted for Deadline 1 of the Examination and provides the Applicant's responses to the RRs received, as categorised by PINS:
- 7 representations from local authorities;
 - 4 representations from parish councils;
 - 7 representations from statutory consultees;
 - 162 representations from members of the public or businesses (plus four additional submissions accepted at the discretion of the ExA);
 - 19 representations from non-statutory organisations.

1.2. STRUCTURE OF THE APPLICANT'S RESPONSES

- 1.2.1.1. The IPs have been grouped by the same categories used on the PINS website, as set out above. A summary of the key points of the RRs is provided in each section, including the name and PINS reference number of each RR. The individual RRs have been categorised by the different themes raised and a response is provided to each of the themes. The Applicant considers that the categorisation used by PINS in defining types of consultee was not always correct in accordance with The Infrastructure Planning (Applications Prescribed Forms and Procedure) Regulations 2009. Accordingly, the Applicant has arranged the consultees in accordance with the Regulations.
- 1.2.1.2. A list of RRs as received can be found in Appendix 1.

2. LOCAL AUTHORITIES

2.1. EASTLEIGH BOROUGH COUNCIL (RR-020)

Table 2.1 – Eastleigh Borough Council

Theme	Summary of RR
General	Eastleigh Borough Council registered as an interested party in order to monitor the application and assess any impacts on local residents, 'likely' linked to construction traffic movements.
Applicant's Response	
The Applicant welcomes Eastleigh Borough Council's relevant representation and is engaged with the Council regarding matters relevant to them.	

2.2. SOUTH DOWNS NATIONAL PARK AUTHORITY (RR-049)

Table 2.2 – South Downs National Park Authority

Theme	Summary of RR
Alternatives	The Authority seek confirmation that National Grid had regard to the impact of the various options on the National Park when preparing the 2014 NGET Feasibility Study.
Applicant's Response	
<p>As is explained in the Supplementary Alternatives Chapter submitted as part of the Environmental Statement Addendum (<i>doc ref 7.8.1</i>), the Applicant is not National Grid and is not in a position to confirm all that National Grid did or did not take into account. Further, it was the Applicant that carried out the assessment of alternatives for the Proposed Development, albeit the decisions on the selection of the final option for the Proposed Development did take into account information provided by National Grid regarding the various connection options.</p> <p>The NGET Feasibility Study was specifically commissioned to cover the technical and commercial aspects associated with a number of potential connection points to the GB NETS and did not consider environmental matters.</p> <p>In undertaking the assessment of the reasonable alternatives for the Proposed Development the Applicant had regard to the potential impacts of connections at Bramley Substation and Lovedean Substation on the South Downs National Park (SDNP). With regards to Bramley Substation the potential impacts related to the potential cable corridor, which would have been required to be located through and/or in close proximity to the national park. With regards to Lovedean Substation the potential impacts related to the location of the Converter Station area in close proximity to the existing Lovedean Substation.</p> <p>Whilst it was noted there was the potential for impacts on the SDNP, in the context of the national park as a whole, it is not considered that the proposals for the development of an interconnector connecting at Lovedean Substation would conflict with the purposes of the national park. For this reason whilst the impacts on the SDNP were considered by the Applicant when determining the suitability of a connection to Lovedean substation and whether it was the preferred option, no greater weighting was needed to be attached to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area comprised in the national park, as would have been required in accordance with subsection (1) of section five to the National Parks and Access to the Countryside Act 1949 where a conflict with those purposes did arise.</p> <p>NGET's Connection and Infrastructure Options Note (CION) did so far as the Applicant is aware consider the potential for impacts on the SDNP, noting in particular that for a connection to Bramley Substation the cable route would likely be required to pass through the SDNP, with significant environmental impacts expected to be associated with this.</p>	

Theme	Summary of RR
	<p>It should be noted with regard to the CION, which is a confidential document, that following any initial connection offer, parties will still be required to undertake more detailed assessments as are necessary, which take into account (but are not limited to) deliverability, construction complexity, land issues, consents, technology, costs, and environmental issues. In respect of the latter, it is incumbent on a promoter to assess the reasonable alternatives for a project to the extent relevant and where not already undertaken, and in the circumstances the requirement to do so lies principally with the Applicant. Any such further detailed assessments as are necessary will either reconfirm the initial option as being the appropriate option to proceed with, as was the case here, or in the event it is reasonably determined another alternative is preferable potentially trigger the need for a modification application. This is important to note, as it is a clear indication that the CION is by no means the only determinant of the appropriate connection location, and its completion does not remove the need for the Applicant to fully consider the reasonable alternatives for the grid connection point in connection with their proposals, to the extent this has not already been undertaken in parallel with the CION process.</p>
<p>Landscape</p>	<p>The Authority stated that the location and scale of the Converter Station causes significant harm to landscape character and impacts on the setting of the National Park and considers that there are no comparable structures within this predominantly rural landscape. However, the Authority has also confirmed that it is 'broadly content with the design parameters of the Converter Station itself'.</p>
<p>Applicant's Response</p>	<p>The Authority's comment is noted. A full assessment of the landscape and visual impacts of the Converter Station is provided in Chapter 15 (Landscape and Visual) of the ES (APP-130) and a summary of the impacts as they relate to the Landscape and Visual Generic Impact as set out in EN-1 is provided in section 5.3.10 of the Planning Statement (APP-108).</p> <p>Chapter 15 (Landscape and Visual) (APP-130) acknowledges that the proposed Converter Station would have a significant effect on the setting of the SDNP within approximately 3 km of the Site during construction and on completion. However, it finds that significance would reduce over time as the mitigation planting matures and would become non-significant by 20 years from completion. It is likewise acknowledged that the Proposed Development would be a new form of building in this landscape. However, it is a rural fringe area, with the Lovedean substation and associated gantries, pylons and overhead lines already forming dominant elements in the local landscape.</p> <p>Appendix 15.5 'South Downs National Park' (APP-403) reviews the contribution the Converter Station Area makes to the setting of the SDNP making reference to the Special Qualities criteria used in the South Downs Landscape Background Paper to the SDPNA Local Plan (Sept 2017). The presence of the existing substation and infrastructure, alongside changes in agricultural practices and a move towards horsiculture were found to have eroded the landscape quality, condition and the tranquillity of area. Balancing these against positive elements including the landform, a sense of contrasts and the extent of woodland, which echo some of the special qualities defined under Special Qualities 1 for the Dip Slope (see SDNPA Local Plan) which includes the Downland Mosaic Landscape Character Type, led to the conclusion that the Converter Station Area's contribution to the setting of the SDNPA is mixed, and that it is of medium sensitivity. Paragraph 5.9.8 of EN-1 confirms that virtually all nationally significant energy infrastructure projects will have an effect on the landscape and visual amenity. Having regards to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.</p> <p>Overall, while it is acknowledged that the Proposed Development would result in significant adverse landscape and visual amenity effects during the construction stage, these have been mitigated as far as practicable through the development of, and adherence to, Design Principles contained within the Design and Access Statement (APP-114), retention of existing vegetation and compliance with the Onshore Outline Construction and Environmental Management Plan (APP 505) which is secured in Requirement 15 of the dDCO (APP-019).</p> <p>During the operational stage, adverse effects related to the Converter Station will largely occur in the short to medium term. There would be localised significant adverse landscape effects on Landscape Character Hambledon and Clanfield Downland Mosaic (D2), Hambledon Downs - Chalk and Clay Farmlands (LCTW2) and Downland Mosaic - Horndean Clanfield Edge (LCA3f) as well as the setting of the South Downs National Park. Effects would reduce over time as planting matures. By year 10 they would remain significant for D2, LCTW2 and on the setting of the South Downs National Park. By 20 years from completion, only indirect effects on D2 would remain significant.</p> <p>Significant adverse visual effects would be experienced by some residents within a 1.2 km radius and there would be localised effects on users of the Monarch's Way, some users of PRoWs, Horndean Technology College cycle route and Broadway Lane (south), Broadway Lane (east) and Day Lane within a 3 km radius. Effects would reduce over time, remain unchanged or alter to neutral as mitigation planting matures such that by 20 years from completion significant effects would only be experienced by some residential receptors in the immediate vicinity of the Converter Station.</p>

Theme	Summary of RR
Landscape and Heritage	The Authority commented that the proposed access track would widen the extent of the land impacted by the development beyond the site itself. Potential impacts identified on the character of Broadway Lane as well as historic fields and their boundaries.
Applicant's Response	
<p>Paragraph 15.3.3.1 of Chapter 15 (Landscape and Visual Amenity) (APP-130) and Appendix 15.1 (Consultation Responses) of the ES (APP-339) identify how the design team have considered the siting and landscape design of the access road and have sought to reduce its visual prominence from local public vantage points by providing screening in the form of hedgerows and trees along the edge of the road.</p> <p>The nature of the permanent surface of the road and landscaping will be agreed as part of the detailed design approvals, maintaining flexibility to integrate it into its immediate surroundings. The dDCO (APP-019) Requirements 7 and 8, require the “provision of landscaping” and “implementation and maintenance of landscaping” which will be in accordance with the OLBS (APP-506 Rev 002). A summary of the construction and operational stage impacts in respect of the access track can be found at paragraphs 15.8.3.6 and 15.8.4.14 of the ES, respectively. Whilst significant impacts are identified during the construction stage, by Year 10 of the operational stage, the surfacing and planting would have softened the access road both west and east of Broadway Lane and the entranceway, resulting in a minor adverse localised (not significant) effect.</p> <p>Alternative options for the siting of the access road were explored and are summarised at paragraph 2.6.5.8 - 13 of ES Chapter 2 (Consideration of Alternatives) (APP-117), however due to the size of some vehicles required during construction and (rare) replacement of equipment during operation, access across Broadway Lane just north of Broadway Cottages is considered the most appropriate solution.</p>	
Landscaping	<p>The Authority continue to assess the landscaping proposals and intend to raise detailed points at the relevant stage. However, an initial concern is raised that the Arboriculture Survey is not comprehensive and ‘takes no account of the likely loss of ash trees (significant coverage) from the landscape’.</p> <p>The Authority suggested that they will be seeking a proposal which ‘adds value’ and ‘is worthy of a nationally significant infrastructure project located adjacent to a National Park’.</p>
Applicant's Response	
<p>The Applicant awaits the Authority’s detailed comments at the relevant stage. However, with regards to the assessment of likely impacts on ash trees, this has been fully assessed in the Arboriculture Report (APP-411) and Chapter 15 (Landscape and Visual Amenity) of the ES (APP-130).</p> <p>With regards to proposed mitigation, paragraph 1.1.1.6 of the OLBS (APP-506) includes measures to protect ash trees:</p> <p>“All ash trees present on site would be regularly inspected for the presence of Chalara ash dieback. Should any ash tree become infected, these must be managed to best practice guidance (Forestry Commission and Natural England, 5 November 2018.) and left standing unless there is a safety issue. Felling would commence once the tree is unable to maintain a crown for three years. Any branches and leaves must be burned, buried or deep-composted on site if practicable. If they are removed from the site, they will be transported in a securely closed container to a place where they can be destroyed appropriately.”</p> <p>In addition, the OLBS requires the maintenance and management of existing vegetation. Section 1.6 of the OLBS covers Specific Landscape Management Prescriptions, including existing features within the Order Limits.</p> <p>The comments made regarding a proposal which adds value are noted, however it is not clear what is being sought and nothing has to date been requested by the South Downs National Park Authority (SDNPA), nor has any clear justification been provided as to how any such proposals may be justified in planning terms. In addition to discussing the design of the buildings with the SDNPA, the Applicant has proposed a comprehensive landscape mitigation package to minimise the impacts of the Proposed Development in the location adjacent to the National park, including the continued maintenance and enhancement of appropriate surrounding existing vegetation in addition to new planting, which is considered adequate mitigation to respond to the visual impacts of the Proposed Development.</p>	
Design & Access	The Authority questions what steps have been taken to reduce the embodied carbon of the construction of the Converter Station.

Theme	Summary of RR
Applicant's Response	
<p>Section 28.8 of Chapter 28 (Carbon and Climate Change) of the ES (APP-143) details the mitigation measures related to construction carbon (including embodied emissions (A1-3)), providing that:</p> <ul style="list-style-type: none"> The detailed design will be optimised to reflect the carbon reduction hierarchy and the requirement for construction materials will be reduced, with construction elements substituted for low-carbon alternatives, where practicable, and the specification of materials and products with reduced Greenhouse Gas emissions will be considered. Furthermore, the sustainability credentials of material suppliers and construction contractors, where practicable, will be considered in relation to commitments to the reduction of Greenhouse Gas emissions, including embodied emission materials. During construction, efficient processes, such as design for manufacture and assembly, the re-use of materials and minimisation of waste, where practicable will be implemented. <p>These commitments are secured in the Onshore Outline Construction Environmental Management Plan (OOCEMP) which includes an Outline Site Waste Management Plan (Appendix 3 of the OOCEMP) and an Outline Materials Management Plan (Appendix 4 of the OOCEMP). A CEMP in accordance with the OOCEMP is required to be submitted to and approved by the relevant planning authority and complied with once approved in accordance with Requirement 15 (CEMP) of the dDCO (APP-019).</p>	

2.3. HAMPSHIRE COUNTY COUNCIL (RR-093)

Table 2.3 – Hampshire County Council

Theme	Summary of RR
Transport	<p>The Council are pleased with the progress of engagement with the Applicant to date and will continue engagement with the Applicant. The position of the Council on specific issues will likely evolve over the course of the Examination. At this stage, the Council's main transport concerns relate to:</p> <ul style="list-style-type: none"> Ensuring appropriate mitigation measures to offset the impacts of the development and ensure residents, nearby development sites and businesses are not unduly affected by the proposed works. The need for additional funds and resources to manage and coordinate the works. The treatment of the New Roads and Street Works Act 1991 (NRSWA) and the Traffic Management Act 2004 (TMA) in the draft DCO.
Applicant's Response	
<p>The Applicant has sought to work closely with Hampshire County Council (HCC) throughout the pre-application process and the Applicant hopes to address the HCC's outstanding transport concerns and establish an agreed approach through the Statement of Common Ground, to be submitted at the relevant deadlines.</p> <p>The Applicant considers that appropriate mitigation measures have been identified to ensure residents and businesses are not unduly affected, as set out in the Framework Traffic Management Strategy (ES Appendix 22.1A) (APP-449) and Framework Construction Traffic Management Plan (Appendix 22.2) (APP-450), and secured by the dDCO Requirements 17 (Construction traffic management plan), 18 (Construction hours) and 19 (Traffic Management Strategy) (APP-019). The Applicant will continue to work with HCC in order to seek to agree final details.</p>	

Theme	Summary of RR
	<p>With regards to resourcing, the Applicant has confirmed its commitment to enter into a post-consent Planning Performance Agreement so as to ensure the costs of processing the required post-consent approvals are covered and discussions continue in this regard.</p> <p>With specific regard to the applicability of the NRSWA and TMA, the draft DCO utilises the NRSWA, expressly providing at Articles 11 and 12 that the NRSWA is applicable and that the undertaker is authorised to carry out works in accordance with relevant applicable requirements of that Act. The Applicant is currently engaged with the respective highway authorities for the highways where the Proposed Development is to be located, including HCC. In particular, the parties are constructively reviewing the extent of the applicability of the NRSWA and what provisions may be included to more fully secure the process that is to be followed to approve the detailed works in the highway for the protection of the highway, in a streamlined manner alongside the detailed design approvals required for the Proposed Development, taking into account the need to minimise the likely significant adverse effects via the application and compliance with the Framework Traffic Management Strategy, which provides the overarching approach to mitigations in the highway. It is expected these discussions will lead to a further developed version of Requirement 19 which provides for the approvals of the detailed traffic management studies or its replacement with other appropriate provisions for the protection of the highway.</p>
Alternatives	HCC seeks clarification and justification as to why there are no suitable alternatives to the utilisation of the A3 and B2150 for cable laying in order to ensure the prolonged delay and disruption to the general public anticipated is a necessity.
Applicant's Response	
A number of alternative onshore cable routes were considered and are identified in ES Chapter 2 (Consideration of Alternatives (APP-117)), including alternative off-highway routes proposed by Winchester City Council and Havant Borough Council. Further information regarding the consideration of the 'Countryside Route', including the Applicant's reasoning for why this was not chosen as the preferred Onshore Cable Corridor in this location, is provided in the Supplementary Alternatives Chapter (doc ref 7.8.1.3) submitted to the ExA alongside this document.	
Flood Risk	<p>The Council raised reservations about the flood risk assessment and have requested further information on areas of uncertainty. However, the Council welcomed the provision made to ensure a consent/permit application is submitted in relation to those temporary or permanent works affecting capacity of ordinary watercourses.</p> <p>The Council also raised concerns that the submitted DCO does not fully recognise their responsibilities in relation to surface water management nor provide sufficient details of a surface water drainage scheme.</p>
Applicant's Response	
<p>The Applicant's approach to the Flood Risk Assessment and proposed mitigation (Appendix 20.4 of the ES (APP-439) were discussed and agreed with Hampshire County Council's as the Lead Local Flood Authority (LLFA) through a collaborative workshop during the pre-application phase (23 July 2019). The Applicant will continue to work with HCC in order address any outstanding reservations about the Flood Risk Assessment and provide the further information required.</p> <p>The support for the provision of consenting/permitting as submitted with the Application is welcomed. As agreed through consultation with the Lead Local Flood Authorities, Environment Agency and Portsmouth Water, the principles of surface water management are defined within the Application and are to be further developed and approved by these statutory consultees as appropriate prior to relevant works commencing.</p> <p>The Applicant will continue to discuss the dDCO and its Requirements with HCC and will seek to agree the approach to Surface Water Management and the Surface Water Drainage Scheme.</p>	
Heritage	Generally satisfied with the information submitted in the ES in relation to the three proposed strategies (greenfield, brownfield and highway) for addressing the archaeological potential within the Order Limits.
Applicant's Response	

Theme	Summary of RR
<p>The Applicant is pleased to acknowledge HCC's general satisfaction with the proposed strategies for addressing the archaeological potential within the Order Limits.</p>	
<p>Landscape</p>	<p>Undeniable significant effect on both the landscape character and appearance on parts of the proposed route, particularly the Converter Station at Lovedean. Nevertheless, HCC note that the proposed landscape mitigation appears to be in scale with the development and is capable of reducing the impact of the proposal in the landscape.</p>
<p>Applicant's Response</p>	
<p>The significant effect on the landscape character and visual amenity is identified in Chapter 15 (Landscape and Visual Amenity) of the ES (APP-130). It is acknowledged and welcomed that HCC consider the proposed landscape mitigation to be in scale with the Proposed Development and capable of reducing the impact of the Proposed Development in the landscape.</p>	
<p>Justification and further detail</p>	<p>HCC seek information on the details and justification for the Converter Station, including the bulk, size and siting of the building.</p>
<p>Applicant's Response</p>	
<p>Details of and further information regarding the justification for the size, location and siting of the Converter Station are provided within the updated Design and Access Statement (APP-114). The Applicant looks forward to engaging with Hampshire County Council further to provide any additional clarifications that may be required in this regard.</p>	
<p>DCO (Flexibility)</p>	<p>Concerns about the level of detail submitted, including the tolerance/flexibility currently provided for in the onshore route and design/siting of above ground infrastructure.</p>
<p>Applicant's Response</p>	
<p>The Application has been developed on the basis of the Rochdale Envelope approach in accordance with the guidance contained within the Planning Inspectorate's Advice Note 9: Rochdale Envelope.</p> <p>The Application confirms the Order Limits and the design parameters for the Proposed Development, as well as clearly identifying what the Proposed Development will comprise, which allows the ES to assess the Proposed Development on the basis of the likely worst case adverse effects.</p> <p>It is considered that the parameter envelope used for the assessment of likely significant environmental effects is wholly adequate and has allowed for the assessment of the worst-case effects, and that the Requirements of the dDCO ensure those parameters are secured and the Proposed Development cannot be carried out in a manner which is likely to give rise to effects that have not been assessed as part of the EIA undertaken and reported in the Environmental Statement.</p> <p>Section 3.6.4 of Chapter 3 (Description of the Development) of the ES (APP-118) provides information regarding the proposed above ground infrastructure along the Onshore Cable Corridor. That infrastructure has been taken into account the assessment of likely significant environmental effects.</p> <p>The Applicant is currently discussing the flexibility sought and how approval will be obtained for the Onshore Cable Route and the siting of above ground Infrastructure in connection with the Onshore Cables with HCC, which it is anticipated will be dealt via approvals to be submitted pursuant to protective provisions contained in the dDCO (APP-019). The above ground infrastructure refers to the link boxes and link pillars that will be installed at joint bay locations along the onshore cable route. These link boxes and pillars are described in the DAS (APP-114) and the Applicant requires some flexibility in the exact position and design, but these will generally be aligned with joint bays.</p>	

2.4. HAVANT BOROUGH COUNCIL (RR-094)

Table 2.4 – Havant Borough Council

Theme	Summary of RR
Alternatives	<p>The Council do not consider the evidence provided to discount the West Waterlooville Alternative Route to be acceptable.</p> <p>A further alternative countryside route was proposed, and HBC acknowledge that designations do exist but consider these have been ruled out without full reference or sufficient information, in the form of appropriate mapping of constraints, which would enable the cabling across the countryside to avoid the constraints identified (and the MDA).</p>
Applicant's Response	
<p>Further information regarding the consideration of the 'Countryside Route', including the Applicant's reasoning for why this was not chosen as the preferred Onshore Cable Corridor in this location, is provided in the Supplementary Alternatives Chapter (doc ref 7.8.1.3) submitted to the ExA alongside this document.</p>	
Noise, Vibration and Air Quality	<p>The Council acknowledge that noise, vibration and air quality impacts would be temporary, however, it is suggested that additional mitigation may be required in the Outline CEMP. HBC will provide a more detailed response in the Local Impact Report.</p>
Applicant's Response	
<p>The comment is noted. The Applicant will continue to discuss the Onshore Outline CEMP and dDCO Requirements with HBC and hopes to address the HBC's 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 with HBC, to be submitted at the relevant Deadlines.</p>	
Socio-economics	<p>The Council raise concerns about potential effects on community resources, amenity, accessibility and businesses which may suffer disruption during construction. It is noted that the applicant proposes to control such matters through the OOCEMP. HBC request that discussions regarding programming be held with the Highway Authority, local business groups and local Councillors to manage conflicts to ensure that proposed traffic management systems and diversion routes are appropriate.</p> <p>The Council consider that access needs further resolution, to ensure that the construction phase does not significantly adversely impact on the viability of businesses and residents. Conclude mitigation and where necessary, compensation, is the only way the issues can be addressed.</p>
Applicant's Response	
<p>The Applicant considers that the relevant mitigation measures set out in the OOCEMP and secured by the dDCO Requirements are appropriate. The Applicant will continue to discuss the OOCEMP (APP-505), the FTMS (APP-449) and the Requirements contained in the dDCO (APP-019) with HBC and hopes to address the HBC's 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 with the HBC, to be submitted at the relevant Deadlines.</p> <p>The Applicant is committed to undertaking all necessary consultations with stakeholders. Section 4.4.2 of the OOCEMP sets out requirements for the contractor to liaise with local authorities and 4.4.3 sets out provisions for public relations. Paragraph 6.2.8.4 of the OOCEMP sets out principles for mitigation which arise from the Transport Assessment (Appendix 22.1 of the ES) (APP-448), including maintaining access to residents, businesses and community facilities, in addition to a communication strategy to keep these stakeholders updated.</p> <p>The FTMS (APP-449) also sets out a programme for construction of the Onshore Cable Route, which forms one of the key mitigation measures during the construction period. The proposed programming of works identifies, for each section of the route, any scheduled events or typically heavily congested periods and seeks to avoid construction in these areas at these times. It also includes restrictions which prohibit the completion of work in multiple locations in close proximity to each other, thereby limiting the cumulative impacts of construction work in any one location.</p> <p>During construction of the Onshore Cable Route the Applicant is also committed to ensuring that access to residential and commercial properties is maintained to the maximum practicable extent. This includes the use of temporary traffic signals or road plating, with access to all residential properties maintained outside of the construction working hours. This is set out in further</p>	

Theme	Summary of RR
	<p>detail in the Cable Route Construction Impacts on Access to Properties and Car Parking and Communication Strategy (Appendix 1 of the FTMS APP-449) which forms part of the updated FTMS (APP-449) in, compliance with which is to secure pursuant to protective provisions for the protection of the highway within the dDCO (APP-019).</p> <p>Measures to reduce recreational impacts are set out in 5.12.4.1 - 5.12.6.1 of the OOCEMP (APP-505 rev 002) and include information for users, signing alternative spaces, review of events programme and maintaining pitches as far as possible within the Order Limits and secured in Requirement 15 of the dDCO. Further detail is provided in Appendix 13 of the ES Addendum (Framework Management Plan for Recreational Impacts) (document reference 7.8.1.13), which reviews the phasing of works and usage requirements of each recreational space, taking account of measures set out in the Onshore Outline CEMP.</p>
Transport	<p>Acknowledge Havant Borough Council is not a unitary authority and Highways and Transport fall within the remit of Hampshire County Council.</p> <p>HBC raise need to consider programming to ensure that road space conflicts are managed with traffic management systems and diversion routes where appropriate.</p>
Applicant's Response	
<p>The Applicant is in ongoing discussions with HCC as the relevant Highway Authority regarding matters of transport, including the approach to confirming the programme for the works to be carried out in the highway, and the response to their representation is included in Section 2.3 of this document.</p> <p>The programme restrictions set out in FTMS which provide the parameters for the programming of works in the highway have taken into account engagement which has been undertaken with HCC as the Highway Authority.</p>	

2.5. EAST HAMPSHIRE DISTRICT COUNCIL (RR-162)

Table 2.5 – East Hampshire District Council

Theme	Summary of RR
Alternatives	<p>Concerns are raised regarding the site selection process for the Converter Station. Concerns relate to the search area and initial five options' in proximity to the SDNP, as well as clarity regarding the environmental considerations which were weighed in selection process.</p>
Applicant's Response	
<p>Further information regarding the selection of the grid connection point for the Proposed Development is provided in the Supplementary Alternatives Chapter submitted as part of the Environmental Statement Addendum [<i>doc ref 7.8.1</i>].</p> <p>A set of criteria were established for the identification of the potential locations for the Converter Station following the identification of Lovedean Substation as the grid connection point. These criteria are set out in paragraph 2.4.5.2 of Chapter 2 (Consideration of Alternatives) of the ES (APP-117).</p> <p>Two AC cable circuits will be required to connect the Converter Station to the Lovedean substation. This will require an easement width of 20 – 22m wide across the countryside, as this would be too large to be accommodated in the existing road network around Lovedean. Although the land used for this may be returned to agricultural use, after the cable burial, it would need to be maintained free from deep rooting vegetation (trees and hedges) for the 40-year lifetime of the scheme and it would be sterilised for all other forms of development. It was therefore preferable and rational to limit the extent of the search area to 2km, with it not being desirable or feasible for an approximate 20m easement width in excess of 2km to be identified in proximity to Lovedean substation, nor was it considered that the likely impacts that would be unavoidable as a result would be acceptable.</p> <p>In addition, AC cables generate a phenomenon known as Reactive Power, the level of which would increase linearly with the length of the underground cable. This unwanted reactive power would need to be compensated for in the design of the AC to DC converter equipment, increasing its size, impacting on the footprint of the station and equipment costs. The use of longer AC cables, beyond 2km to reach a converter station also introduces the risk of harmonic resonances, which could severely disrupt the operation of the converter station. Installing equipment to counteract such effects would have added to the footprint and cost of the converter station.</p>	

Theme	Summary of RR
	<p>The capital cost of long AC cables, increased equipment requirements and the loss of power in the cables were therefore also compelling factors in minimising their length. Through the optioneering process five potential sites within 2km to Lovedean Substation were identified and considered, as detailed in sections 2.4.5 and 2.4.10 of Chapter 2 (Consideration of Alternatives). The key environmental considerations relevant to the options for the Converter Station Area location were those related to visual amenity, noise and impacts on the natural environment (for instance the need to avoid adversely impacting irreplaceable ancient woodland). Siting the Converter Station in close proximity to the west of the existing Lovedean Substation and between the existing overhead transmission lines is intended to minimise the visual impact that would be experienced by comparison to the other shortlisted sites, with this site best able to utilise the existing topography and surrounding hedgerows, hedgerow trees and woodland to provide natural visual screening, accepting that some immediate visual receptors would be affected (which is unavoidable given the scale of the buildings required to perform the function of the Proposed Development). In addition, it was concluded the option selected was the least likely to give rise to noise impacts, with such impacts able to adequately mitigate in this location.</p> <p>The siting of the Converter Station is subject to ongoing discussion with a number of landowners. The status of negotiations with the respective parties is provided in the updated Statement of Reasons (APP-022 Rev-002). The Applicant is confident the negotiations with each of the parties can be concluded in advance of the end of the Examination.</p> <p>The optionality between Converter Station location options B(i) and B(ii) is dependent on securing the agreement of National Grid to use Plot 1-27 for the siting of part of the Converter Station to facilitate Option B(ii) without detriment to National Grid's operations at the Lovedean substation. The Applicant is confident Heads of Terms will be agreed with National Grid in the near future and an Option Agreement for the necessary rights will be agreed between the parties before the end of the Examination.</p> <p>Specific considerations with regard to the South Downs National Park in relation to the reasonable alternatives studied by the Applicant are explained in the Supplementary Alternatives Chapter submitted as part of the Environmental Statement Addendum (doc ref 7.8.1) and the response to the relevant representation of the SDNPA included at Section 2.2 of this document.</p>
Landscape	<p>Concerns are raised that the proposed access track from Broadway Lane dissects fields with poor relationships to landscape features to the detriment of the landscape and setting of a public footpath.</p>
Applicant's Response	
<p>Paragraph 15.3.3.1 of Chapter 15 (Landscape and Visual Amenity) (APP-130) and Appendix 15.1 (Consultation Responses) of the ES (APP-339) identify how the design team have considered the siting and landscape design of the access road and have sought to reduce its visual prominence from local public vantage points by providing screening in the form of hedgerows and trees along the edge of the road. The nature of the permanent surface of the road and landscaping will be agreed as part of the detailed design approvals, maintaining some flexibility at the current stage to integrate it into its immediate surroundings.</p> <p>Alternative options to the siting of Access Road were explored (paragraphs 2.6.5.8 -2.6.5.13 of Chapter 2 (Consideration of Alternatives) (APP-117) in this regard. However due to the size of the vehicles required during construction and (occasional) replacement of equipment during operation access across Broadway Lane just north of Broadway Cottages is considered the most appropriate solution.</p>	
Landscape	<p>The Council consider that a Landscaping Maintenance and Management Plan must be agreed as part of the DCO Requirements to secure long-term landscaping features.</p>
Applicant's Response	
<p>Requirements 7 (provision of landscaping) and 8 (implementation and maintenance of landscaping) of the dDCO (APP-019) require a detailed landscaping scheme (which accords with the Outline Landscape and Biodiversity Strategy (APP-506) now updated Outline Landscape and Biodiversity Strategy (APP-506 Rev002)) to be submitted to and approved by the relevant planning authority before any works at Works No. 2 can commence, and for it to be maintained thereafter. The detailed landscape scheme will include detailed landscape mitigation plans together with management, maintenance and monitoring plans. It will also include confirmed management responsibilities (expanding as necessary on paragraphs 1.7.1.3 to 1.7.2.2 in the now updated Outline Landscape and Biodiversity Strategy revised paragraphs 1.8.3.1 to 1.8.3.10).</p> <p>The Applicant will continue to discuss the draft Requirements with East Hampshire District Council and the documents submitted which relate to those Requirements, to ensure they provide for adequate long-term maintenance of both new and existing landscaping features. Acquisition of rights over existing landscape features is currently being negotiated and is sought via compulsion for if those negotiations are not successful, to ensure existing landscaping that provides a screening function can be adequately maintained in the future.</p>	

Theme	Summary of RR
Design	<p>Notwithstanding existing infrastructure, the Council raise concerns that the scale, massing and industrial form of the Converter Station would have a significant harmful impact on the rural landscape character.</p> <p>Whilst design parameters have been discussed, the Council continue to be concerned that the buildings would be of a utilitarian design that would not respond positively to landscape context or mitigate or enhance its appearance other than through the use of coloured cladding.</p> <p>No indication of cooling systems to be installed on the exterior together with concern with indicated external staircases and lighting columns / lightning masts.</p>
Applicant's Response	
<p>ES Chapter 15 (Landscape and Visual Amenity) (APP-130) identifies the effects on the landscape character. The design of the infrastructure is dictated to a high degree by its function as set out at paragraph 3.6.3.39 of ES Chapter 3 (Description of the Proposed Development) (APP-118) and further explained in the Design and Access Statement (DAS) (APP-114). Whilst noting the constraints inherent in the functional requirements, the Applicant has given careful consideration as to how the Converter Station and electrical infrastructure is designed in order to minimise the likely environmental effects associated with the visual appearance.</p> <p>A set of design principles are listed at Section 6 of the DAS, which dictate the requirements for the final design of the Converter Station. The design principles have been developed in large part through a series of design meetings held with EHDC, SDNPA and WCC. The design principles explain how different functions should be rationalised into simple building forms, which seek to avoid visual clutter from several different sized buildings. The design principles ensure that plant and equipment will not be located on the roof of the highest buildings. The proposed cladding is to consist of narrow vertical elements to break up the overall mass and curved corners may be incorporated where practicable to soften the building forms.</p> <p>Infrastructure associated with the Converter Station is identified on the Indicative Converter Station Area Layout Plans (APP-013) Sheet 1 and Indicative Converter Station Elevations (APP-014) Sheet 2 for further information. The plans illustrate that the Converter Station has two heat exchangers as part of the cooling system. The heat exchangers are located between the two Valve/ DC Hall buildings and the Control Buildings, whilst the majority of the cooling system pumps and motors will be located inside the Control Building. The basis of the design for the buildings on site is that there shall be no planned inspection or maintenance activities that require direct roof access during the buildings' life. Therefore, permanent access or maintenance systems may not be required provided that clear access for a mobile or fixed platform to facilitate any necessary visual inspection is established and maintained. However, the exact design of access to the building is yet to be finalised and will be progressed at detailed design. Lighting masts will be installed in the AC switchyard area, with smaller masts on the Converter Building, to protect the Converter Station's electrical equipment from direct lightning strikes.</p> <p>As secured by Requirement 6 of the dDCO (APP-019), the final Converter Station design must accord with the design principles and design details, including layout, scale and external appearance and materials, must be submitted to and approved in writing by the relevant planning authority in consultation with the SDNPA.</p>	
Onshore Ecology	<p>The Council stresses that sufficient working practices and forward mitigation should be in place ahead of all preliminary works. The Council also raise concern regarding the scale of the proposed biodiversity enhancements and request that an Ecological Maintenance and Management Plan forms part of the DCO Requirements. (Work No. 1 and 2 only)</p>
Applicant's Response	
<p>Mitigation measures and working practices proposed are detailed within Section 1.4 'Impacts, Avoidance and Mitigation' within the OLBS (APP-506). Construction stage impacts would be managed through standard control measures secured through a Construction Environmental Management Plan (CEMP) secured in Requirement 15 of the draft DCO (APP-019) and to be in accordance with the submitted Outline Onshore CEMP (APP-505). In this regard it should be noted that the CEMP for the relevant works is required before any onshore site preparation works commence, therefore covering the entirety of the works proposed.</p> <p>Requirement 9 of the dDCO requires a written Biodiversity Management Strategy (which accords with the Outline Landscape and Biodiversity Strategy (APP-506) now updated Outline Landscape and Biodiversity Strategy (APP-506 Rev002)) to be submitted and approved by the relevant planning authority in consultation with the statutory nature conservation body before any works at Works No. 2 may commence.</p> <p>The Applicant will continue to discuss the Requirements in the dDCO with EHDC and the outline documents submitted which relate to those Requirements.</p> <p>The Applicant's position with regards to biodiversity matters is explained in the submitted Biodiversity Position Paper (<i>Doc Ref 7.7.9</i>)</p>	

Theme	Summary of RR
Noise	The Council states that the proposed noise mitigation must be secured through the DCO Requirements, including a mechanism by which noise levels are monitored and further noise mitigation measures incorporated if necessary.
Applicant's Response	
<p>Requirement 20 of the dDCO (APP-019) requires a Noise Management Plan to be submitted to and approved by the relevant planning authority prior to the use of Works No. 2 (the Converter Station Area). The drafting of this requirement has been updated to refer to and require compliance with the operational broadband and octave band noise criteria document (doc ref 7.7.11).</p> <p>Paragraph 24.6.1.10 of Chapter 24 (Noise and Vibration) (APP-139) acknowledges that future detailed design of the Converter Station may present equipment lists with different noise source levels, which could require different mitigation measures (including embedded mitigation). The same paragraph also states that the noise criteria must be achieved regardless of the specific equipment and mitigation ultimately used in the design. The operational noise criteria have, therefore, been embedded into the Converter Station design through Design Principle 9 contained in the Design and Access Statement (APP-114) and secured via the draft DCO Requirements.</p>	
Transport (CTMP)	<p>The Council raises concerns that residential properties are not listed as 'sensitive receptors' in the Framework Construction Transport Management Plan (FCTMP) and consider that many dwellings along the construction route are sensitive to impacts.</p> <p>The Council consider it is imperative that there is effective pro-active communication with the local community in the Lovedean area and that this is secured through a Stakeholder Communication Plan (to include a programme, advance notice of road closures and abnormal load deliveries, monitoring/active responses).</p>
Applicant's Response	
<p>ES Chapter 22 (Traffic and Transport) (APP-137) assessed 'residential properties close to the carriageway' as being of medium sensitivity. It is acknowledged that residential properties were not listed as a sensitive receptor in the FCTMP, and this has been addressed in an updated version of the FCTMP, submitted alongside this document.</p> <p>The Applicant is committed to undertaking all necessary consultation with stakeholders, including the local community. Section 4.4.2 of the OOCEMP (APP-505) sets out requirements for the contractor to liaise with local authorities and 4.4.3 sets out requirements for public relations. Paragraph 6.2.8.4 of the OOCEMP sets out principles for mitigation which arise from the Transport Assessment (Appendix 22.1 of the ES, APP-448), including maintaining access to residents, businesses and community facilities, in addition to a communication strategy to keep these stakeholders updated.</p> <p>The Onshore Cable Route Construction Impacts on Access to Properties and Car Parking and Communication Strategy included as Appendix 1 of the FTMS (APP-449) details affected sensitive receptors along the cable route (including residential and commercial properties) and outlines in section 5 the impacts and mitigation proposed regarding these receptors. Section 6 – 9 of the report outlines the Applicant's approach to communicating with the residents, business and the wider public during the construction of the Onshore Cable Route and the relevant methods that will be employed.</p> <p>Mitigation will be secured within Requirements 15 (Construction environmental management plan), 17 (Construction traffic management plan), and via protective provisions for the protection of the highways and traffic within the dDCO (APP-119).</p>	

2.6. PORTSMOUTH CITY COUNCIL (RR-185)

Table 2.6 – Portsmouth City Council

Theme	Summary of RR
<p>Compulsory Acquisition</p>	<p>Portsmouth City Council (PCC) objects to the application and rejects that CPO is sought in the public interest being for a private company for its own profits and consider the extent of Order Limits excessive and unjustified, including areas of land for public use.</p> <p>Where land is not subject to CPO, Aquind seeks to secure powers with special rights and exceptions to the usual process, including limiting development potential and restricting access during maintenance operations.</p> <p>Consider the Applicant has not engaged with PCC about the compulsory acquisition of PCC land and compensation.</p> <p>In addition, consent is sought for commercial telecommunications infrastructure under the Electricity Act 1989 powers and is considered incompatible with that legislation and is ultra vires as minimal Fibre Optic Cables are required for monitoring this interconnector.</p>
<p>Applicant's Response</p>	<p>The justification for the proposed grant of powers to authorise the compulsorily acquisition of land and rights in connection with the Proposed Development, including the reasons why there is a compelling case in the public interest given the national significance of the Proposed Development, is explained within the Statement of Reasons (SoR) (APP-022). As is also explained in the SoR (para 7.2.3) the location and extent of the land onshore has been carefully considered and designed to optimise the route, to cause as little disruption and to affect the minimum amount of land possible and also to avoid the sterilisation of undeveloped land in the future.</p> <p>The Order Limits provide a limit of deviation within which the Proposed Development will be located. An explanation of the need for flexibility in relation to the Onshore Cable Corridor is provided at section 5 of the SoR which confirms (at paragraph 5.2.2) that the Applicant is seeking consent to lay the onshore HVDC cables anywhere within the defined Onshore Cable Corridor because the precise alignment of the Onshore Cable Route is yet to be determined and will inevitably need to take into account existing utilities which are encountered, as well as providing some design flexibility to optimise delivery. It is considered this approach is entirely reasonable and is consistent with the approach taken for many other linear schemes. The extent of any land or rights over land that Articles 20 and 23 propose to authorise for compulsory acquisition is only so much as is required for the construction, operation and maintenance of the Proposed Development, and is therefore subject to a further test of necessity.</p> <p>The Applicant has engaged with PCC regarding the Proposed Development since April 2017 as set out in the Consultation Report (APP-025). This engagement has focussed on numerous aspects of the Proposed Development including the rights necessary for its construction, operation and maintenance. Information regarding Compulsory Purchase in connection with the Proposed Development is provided within the SoR.</p> <p>The Applicant will continue to engage with the Council in their capacity as a landowner to seek to secure the rights required by agreement.</p> <p>A communication link between the two converter station sites is integral to any HVDC interconnector and is essential for control, protection and telecoms purposes between the two converter station sites. This is commonly achieved through installation of fibre optic cable infrastructure as part of the HVDC scheme and supports its operation. One FOC will be installed alongside each circuit of HVDC cables (Marine and Onshore). As a standard industry practice and requirements, FOCs are installed together with HVDC cables for this purpose of control, monitoring and protection of the HVDC cables as well as communication between the Converter Stations and thus are an essential part of the Proposed Development. The physical parameters of FOCs used for these purposes allow the inclusion of spare glass fibres which can be used to provide telecommunications services to third parties. The cable itself does not noticeably change if the number of fibres within it is reduced. The proposed use of spare fibres within the FOC for commercial purposes is an efficient way for the Applicant to provide additional essential utility services. It is considered the commercial use of the spare fibres within the fibre optic cables is associated development in accordance with how that term is defined at section 115(2) of the PA 2008 and development consent may therefore be granted for this use in accordance with Section 115 of the Planning Act 2008. Further information in this regard is provided within the Statement in relation to development associated with AQUIND Interconnector (doc ref 7.7.1).</p>
<p>Compulsory Acquisition – Special Category Land</p>	<p>Consider Article 23 of the draft Order seeks compulsory acquisition of rights and imposition of restrictive covenants for Special Land (allotments and public open space), failing to satisfy the requirements of s132 of the Planning Act 2008 as no replacement land is being offered.</p>

Theme	Summary of RR
	<p>PCC advise open space and garden allotment land are assets for the purposes of Article 1 to the First Protocol of the European Convention on Human Rights and consider these rights (for the Council and members of the public) would be lost.</p>
<p>Applicant's Response</p>	
<p>The relevant considerations in relation to special category land and section 132 of the PA 2008 are contained at paragraph 8.1 of the Statement of Reasons (APP-022). Paragraph 8.1.4 confirms there will be no physical infrastructure on the surface of special category land which the compulsory acquisition of rights is proposed to be authorised, and the acquisition of those rights over land will not affect the character of that land following the construction of the Proposed Development, since the surface of the land is required to be restored to its former condition in accordance with Requirement 22 (Restoration of land used temporarily for construction) of the draft DCO (APP-019). Accordingly, the land will be no less advantageous than it was before to the persons specified in Section 132(3) of the Planning Act 2008. It is therefore considered that such rights are not required to be subject to special parliamentary procedure in accordance with Section 132(3) and there is no need for any replacement land as there will be no land permanently affected. It should also be noted in relation to the Milton allotments that the cable is proposed to be installed by HDD in this location, with no effect on the surface of the land during construction. This construction methodology was specifically proposed in this location to avoid affecting the continued use of the allotments.</p> <p>Section 7 of the Statement of Reasons explains the consideration that has been given to the powers of compulsory acquisition sought and the European Convention on Human Rights and why the potential interferences are considered to be proportionate and necessary, striking a fair balance between the public benefit and interest in the Proposed Development being delivered and the interference with the rights that will be affected.</p>	
<p>Acquisition of Highway Subsoil</p>	<p>Note the Applicant has the benefit of an Electricity Interconnector Licence and is therefore a statutory undertaker for the purpose of the New Road and Street Works Act 1991 (NRSWA) and thus consider the acquisition of highway subsoil is not necessary. The proposed acquisition of subsoil to the highway is therefore considered to overreach the necessary minimum measures and has not made a clear case for the need to alter the regime as necessary.</p> <p>In addition, PCC consider the attempt to acquire highway subsoil unnecessarily will impact upon the Article 8 ECHR right to respect for private and family life where private homes adjoin affected highway and own that subsoil under the ad medium filum presumption. It is unclear that such persons have been properly consulted and deprivation of such property without compensation would offend Article 1 ECHR and be contrary to the Planning Act 2008.</p>

Theme	Summary of RR
<p>Applicant Response</p>	<p>Where the cables are to be located in land forming part of the highway, the undertaker will locate the cables pursuant to statutory authority to be granted pursuant to Article 11 of the DCO (Street Works), and subject to those sections of the NRSWA detailed in paragraph 2 of Article 12 (Application of the 1991 Act) (which is subject to further discussion with the relevant highway authorities). Where the cables are located in land where the depth is such that they are no longer in land which forms the highway, an easement to locate the cables in that land will be required, and it is the acquisition of that easement which powers of compulsory acquisition are sought to authorise.</p> <p>Portsmouth City Council is fully aware of all stages of consultation that were undertaken with all ad medium filum landowners, and indeed raised concerns with the Applicant that it had taken the decision to contact those persons and made representations regarding further consultation with them. Noting these representations, the Applicant sought to provide a proportionate level of correspondence with those persons necessary to ensure they were adequately consulted. All persons presumed to own land beneath the highway were consulted pursuant to Section 42 of the Planning Act 2008 as persons with an interest in land affected by the Proposed Development. All such persons were also sent a diligent inquiry in relation to their land interest. All such persons were also notified of the acceptance of the application as is required in accordance with Section 56 of the Planning Act 2008.</p> <p>Section 7 of the Statement of Reasons (APP-022) clearly explains the consideration given to the powers of compulsory acquisition sought and the European Convention on Human Rights and why the potential interferences are considered to be proportionate and necessary, striking a fair balance between the public benefit and interest in the Proposed Development being delivered and the interference with the rights that will be affected.</p> <p>Further information regarding the need to seek to acquire an easement over land beneath the land, where the Proposed Development is located in this land, is provided with in the Statement in relation to highway subsoil acquisition (Doc Ref 7.7.2).</p>
<p>DCO</p>	<p>Consider the amendment of existing legislative frameworks that empower local authorities to govern (e.g. trees, highways) through the DCO is unjustified.</p> <p>Where approvals are to be required, it seeks deeming provisions that allow Aquind to proceed as it wishes where a Council is unable to respond within a fixed timescale.</p> <p>PCC as Local Highway Authority require works on the public highway to have notices served correctly under the NRSWA and Traffic Management Act 2004.</p> <p>PCC anticipate implementation of a permit scheme by summer 2020, with a lane rental scheme to follow; any works on the highway will be expected to adhere to the procedures set within. Consequently, PCC objects to any deviation from or disapplication of the NRSWA.</p> <p>PCC also object to rights sought to make, alter, impose and enforce Traffic Regulation Orders.</p>
<p>Applicant's Response</p>	

Theme	Summary of RR
	<p>The dDCO (APP-019) expressly provides at Articles 11 and 12 that the NRSWA is applicable and that the undertaker is authorised to carry out works in accordance with the relevant applicable requirements of that Act. The Applicant is currently engaged with the respective highway authorities, including PCC, noting the parties are constructively reviewing the extent of the applicability of the NRSWA and what provisions may be included to more fully secure the process for the protection of the highway in a streamlined manner, alongside the detailed design approvals required for the Proposed Development, taking into account the need to minimise the likely significant adverse effects of the Proposed Development via the application and compliance with the FTMS (APP-449). The Applicant has included protective provisions for the protection of the highway and traffic within the dDCO (Doc Ref), which were provided to PCC for comment, but none has been received at the time of the submission of these responses, which provides for the approval of the detailed traffic management strategies.</p> <p>With regard to the comments in relation to the undertaker having the ability to make, alter, impose and enforce Traffic Regulation Orders (see Article 16 of the draft DCO), the Explanatory Memorandum (APP-020) provides an explanation of these provisions and why they are considered to be necessary in connection with the Proposed Development. It should be noted that the ability to use the powers afforded by this Article is only with the consent of the relevant highway authority and only where necessary in connection with the Proposed Development (with it not being anticipated that any permanent Traffic Regulation Orders will be required in connection with the Proposed Development), and the extent of any such measures will be confirmed when the detailed traffic management strategies are approved by the relevant highway authority. It is therefore not considered that the ability to make, alter, impose and enforce Traffic Regulation Orders will impact on the ability of the relevant highway authorities to properly manage and control its network as stated.</p> <p>It is noted that Articles 10, 11, 13, 14 and 16 to the dDCO (APP-019) relating to highway approvals include a deeming provision where a decision is not provided within a reasonable timescale. The reasons for this are clearly explained at paragraphs 7.4, 7.9, 7.12, 7.16 and 7.24 of the Explanatory Memorandum (APP-020). It should be noted that the relevant authority has a period of twenty working days within which to provide a response in all circumstances, which is considered to be adequate whilst ensuring the works and the delivery of the nationally significant Proposed Development are not unduly delayed or frustrated. In addition, in most circumstances the use of powers in these Articles will be governed by the protective provisions for the protection of the highway and traffic which provide for the submission and approval of the traffic management strategies required, and so sufficient advance notice of the works and any amendments required will be provided to the authority in accordance with that process so as to allow them to consider and make an informed decision within a more than reasonable timeframe.</p> <p>The Applicant understands that PCC has implemented a permit scheme, which became operational on 17 August 2020. As has been explained, the approach being taken is to use the NRSWA and bespoke provisions in the DCO to streamline the design approvals and the related highway mitigations. It is further noted a lane rental scheme is proposed to follow.</p>
Financial / Viability	<p>Raise the Applicants two cases pending at the Court of Justice of the European Union (“CJEU”) regarding an exemption which raises concern regarding financial viability.</p> <p>Consider the Funding Statement insufficient with regards to calculation of project costs (including land, blight, Crown Estate seabed interests, and contingency) and project funding based on high-level cost estimates.</p> <p>Concern the Applicant has a shareholder’s deficit and the project is not yet fully funded, being raised through equity capital and project debt financing secured against operational profits.</p> <p>No current consent/agreement with the French authorities.</p>
Applicant’s Response	
<p>While the Project does not have the benefit of full funding at this stage, this is not unusual for a project where the securing of funding is dependent on the securing of development consent. It is not anticipated that there will be any funding shortfalls for the Project in terms of its principal project cost financing or land acquisition at the time when such finance is required.</p> <p>The cost estimates for the Project are considered to be accurate and present a realistic understanding of the likely overall cost. It has been informed by extensive industry and contractor engagement to provide the required level of certainty for the Project at this stage.</p> <p>The position with regard to progress in respect of, and the anticipated timescales to obtain, the required consents to permit the elements of the Project located in France is explained in the Other Consents and Licences Document (APP-106).</p>	
Consenting Process	<p>Notwithstanding the s35 direction, PCC consider the project fails to meet the requirements of the Planning Act 2008.</p>
Applicant’s Response	

Theme	Summary of RR
<p>The proposed Development does meet the relevant requirements of the Planning Act 2008 and for this reason the Section 35 Direction was issued by the Secretary of State.</p>	
<p>Community Engagement</p>	<p>Consider the formal consultation was insufficient, requiring more resources/advertising allocated to promoting the consultation events and project to the wider population. Engagement with other stakeholders, community or interest groups and others who may have an interest in the Proposed Development, as well as hard to reach groups, has not been sufficient for a project of this size and significance.</p>
<p>Applicant's Response</p>	
<p>The draft Statement of Community Consultation (SoCC) was consulted on 28 August 2018, with the formal SoCC issued on 12 December 2018 and included additional consultees as identified by PCC. The Consultation Report (APP-025) confirms compliance with the SoCC which was accepted by PINS as compliant, as reflected in the s55 Checklist (PD-002). Section 51 advice was provided by PINS (PD-003) and additional consultees identified which the Applicant has subsequently consulted.</p>	
<p>The Applicant also notes the comments contained in PINS letter of 11 May 2020 confirming that matters relating to pre-application consultation precede and therefore lie outside the remit of the Examination process, and the matters discussed at the Preliminary Meeting and in the Procedural Deadline submission in relation to the Preliminary Meeting.</p>	
<p>Transport</p>	<ol style="list-style-type: none"> 1. PCC advise any reduction in capacity of the three key routes to the mainland (including A2030 Eastern Road) seriously reduces the resilience of the already strained highway network and loading demand to other alternative routes. 2. Noting that cables are proposed to encroach into the highway as little as is practicable PCC consider this unavoidable in certain locations resulting in severe impacts. 3. Concerns about the impacts on highways and the adequacy of Aquind's assessment and understanding of these likely impacts, which include all road users. Specifically consider works in the area of Milton pose potential significant disruption to residents, businesses and visitors. 4. The number and location of joint bays are unknown, and whilst anticipated to be "off-carriageway", PCC require suggested locations to allow their impact to be assessed. 5. PCC agree traffic modelling has been carried out in line with the scoping note previously submitted to and agreed and acknowledge this attempts to replicate a "worst case" scenario but have concern it does not cover a possible cable route along the A2030 between Tangier Road and Eastern Avenue, nor cumulative residual impacts of traffic merging to pass-by works/diversions. Whilst the SRTM makes an assumption as to the redirection of traffic it does not accurately predict vehicle movements at a microscopic level with overall impacts likely to be greater/wider than anticipated. 6. Consider the definition of abnormal loads is incorrect and should be 40 tonnes, not 80 tonnes, requiring reassessment of abnormal loads. 7. Note a Framework Construction Traffic Management Plan has been provided, with a tailored CTMP to be produced for each construction phase. PCC consider this too late as impacts need to be fully understood pre-consent. The traffic management drawings are high level and indicate where lane closures/road closures are required and what the likely diversionary routes will be but have concerns on road closures and restricted access for residents, business and emergency services. 8. Anticipate serious congestion on the local highway network and consider the 'Construction Management' proposed is an entirely inadequate response to mitigate the construction impacts. 9. Request for details of the consultation strategy for each cable section to be included and agreed. 10. No programme is available at a sectional (and sub-sectional) level, subsequently PCC is unable to ascertain whether the various assumptions/restrictions applied translate to a viable programme. 11. Request assurance that if multiple contractors are appointed, coordination is required to avoid knock-on impacts and delays, especially if working on the same section of road and advise that the CTMP should detail how this coordination is achieved.

Theme	Summary of RR
	<p>12. Note EN-1, para 5.13.6 states that new energy NSIPs may give rise to substantial impacts on the surrounding transport infrastructure, including during construction but that Applicants are required to mitigate these impacts. PCC propose funding to bring forward increased park and ride capacity as mitigation and to contribute to poor air quality.</p> <p>13. Advise that proposed programme of works will likely clash with significant schemes, including proposed works associated with the Transforming Cities Fund and the route proposed to form the new South East Hampshire Rapid Transit (SEHRT), anticipated to run until March 2023.</p>
<p>Applicant's Response</p>	
<p>The Applicant has engaged with PCC on the potential effects of the Proposed Development on highways and transport since April 2017 and will continue to engage during the course of the Examination, with a view to resolving all outstanding matters.</p> <p>(1) Impact on Other Routes</p> <p>The three routes between Portsea Island are included within the study area and have been assessed within the Transport Assessment (APP-448) submitted as part of the DCO application using the Sub-Regional Transport Model (SRTM). The SRTM is a strategic modelling tool which has assessed the impacts of the installation of traffic management on the A2030 Eastern Road and resultant reassignment of traffic onto alternative routes, including the M275 and A3 London Road. The impacts of these traffic flow increases have also been assessed within the TA at the A3 Mile End Road / Church Street / Hope Street / Commercial Road signalised roundabout (at the southern end of the M275) and the A27 / A3 / A397 Portsbridge Roundabout.</p> <p>At the A3 Mile End Road / Church Street / Hope Street / Commercial Road junction traffic delays are forecast to increase by approximately one minute as a result of the construction works, albeit this is viewed in the context of congested conditions in the Do-Minimum scenario. At the A27 / A3 / A397 Portsbridge Roundabout traffic delays are forecast to increase by up to 30 seconds as a result of the construction works, with the junction operating at capacity in all of the assessed scenarios.</p> <p>(2) Impact of Construction</p> <p>The TA (APP-448) submitted as part of the Application used a combination of the SRTM and localised junction capacity assessments to fully and robustly assess the cumulative temporary impacts relating to construction of the Onshore Cable Route. In addition, the Eastern Road Further Traffic Assessments Technical Note (doc ref needed) appended to the Supplementary TA (doc ref) has provided an additional assessment of the impacts of traffic management being installed on the A2030 Eastern Road. Neither of these documents show that the impacts of construction are severe due to the reassignment of traffic flows across the wider highway network within Portsmouth.</p> <p>Furthermore, the Framework Traffic Management Strategy (FTMS) (APP-449) provides a mitigation strategy for the works through the construction programme which includes calendar restrictions which dictate which periods of the year works can be undertaken on A2030 Eastern Road, and programme restraints which prevent works being undertaken at the same time at sections in close proximity to one another. As is detailed in the FTMS, both the calendar and programme restrictions set out act to mitigate the impacts of the proposed works on A2030 Eastern Road.</p> <p>(3) Assessment of All Road Users</p> <p>The TA (APP-448) submitted as part of the Application used a combination of the SRTM and localised junction capacity assessments to fully and robustly assess the cumulative temporary impacts relating to construction of the Onshore Cable Route. In addition, the Eastern Road Further Traffic Assessments Technical Note appended to the Supplementary TA has provided an additional assessment of the impacts of traffic management being installed on the A2030 Eastern Road. Neither of these documents show that the impacts of construction are severe due to the reassignment of traffic flows across the wider highway network within Portsmouth.</p> <p>Furthermore, the FTMS (APP-449) provides a mitigation strategy for the works through the construction programme which includes calendar restrictions which dictate which periods of the year works can be undertaken on A2030 Eastern Road, and programme restraints which prevent works being undertaken at the same time at sections in close proximity to one another. As is detailed in the FTMS, both the calendar and programme restrictions set out act to mitigate the impacts of the proposed works on A2030 Eastern Road.</p> <p>(4) Joint Bays</p> <p>Paragraph 1.3.10.9 of ES Appendix 22.1 (Transport Assessment), confirms that the number and definitive locations of the Joint Bays are dependent on detailed design which cannot be confirmed at this stage. However, it should be noted that in all cases the Joint Bay locations will fall within the Order Limits and be located off-carriageway where practicable. The draft DCO (APP-019) confirms in Schedule 1, Work No. 4 – works to lay the onshore HVDC cables, that there will be a maximum of 25 joint bays per cable circuit along the full onshore route.</p>	

Theme	Summary of RR
	<p>Further to this, the Supplementary Transport Assessment (Section 2.7.4) submitted with this document provides an assessment of indicative Joint Bay locations as included in Figure 24.2 Illustrative Cable Route, HDD sites and Joint Bays for noise and vibration assessment' from Chapter 24 of the ES (APP-336). This assessment takes account of preliminary assessments completed to-date to define where cable drum deliveries will be required and uses a typical cable drum delivery vehicle.</p> <p>To facilitate access by cable drum delivery vehicles (and all construction activities) the dDCO includes provision to temporarily alter the layout of any street (Paragraph 10) and implement Temporary Traffic Regulation Orders (TTROs) to permit, prohibit or restrict stopping, parking, waiting or loading of vehicles on any road (Paragraph 16). Taking this into account, the assessment of Joint Bay locations has shown that access will be achievable to all locations without the need to significant highway layout alterations and without generating significant environmental effects.</p> <p>(5) SRTM Modelling</p> <p>Noting the concerns raised by PCC, the Applicant has undertaken further sensitivity analysis to assess the impact of lane closures on A2030 Eastern Road.</p> <p>This assessment has included a review of baseline traffic data has shown that in the context of observed traffic flows, it can be confirmed that the TA has assessed the worst-case scenario for the A2030 Eastern Road, through the inclusion in the SRTM of traffic management located between Airport Service Road and Burrfields Road.</p> <p>The Technical Note also includes an assessment of the impacts of construction works and associated traffic management being located on the A2030 Eastern Road between Tangier Road and Eastern Avenue. The results of this assessment indicate similar results in terms of traffic delay and journey time changes to the traffic management scenario assessed within the SRTM between Airport Service Road and Burrfields Road within the Transport Assessment. The further assessment in this TN validates that the assessment of the A2030 Eastern Road completed in the TA and using the SRTM is robust and representative.</p> <p>Analysis contained within Section 4 of the TN of the SRTM outputs for A2030 Eastern Road show how the modelled TM temporarily impacts upon link speeds and journey times, decreases traffic flow and leads to a reassignment of traffic across the wider highway network. The local junction capacity and link based assessments undertaken in the TA, using the SRTM traffic flows which account for the reassignment of traffic away from the works, also robustly assess the temporary impacts on the wider highway network in the assessed scenarios.</p> <p>(6) Abnormal and Indivisible Loads</p> <p>It is acknowledged that there was an error in the definition of 'abnormal vehicle' included within the submission. For clarification, the Applicant notes the official definition of an 'abnormal load', as is set out by Driver and Vehicle Standard Agency ('DVSA')^[1] is as follows:</p> <p><i>"An 'abnormal load' is a vehicle that has any of the following:</i></p> <ul style="list-style-type: none"> • <i>a weight of more than 44,000 kg</i> • <i>an axle load of more than 10,000kg for a single non-driving axle and 11,500kg for a single driving axle</i> • <i>a width of more than 2.9 metres</i> • <i>a rigid length of more than 18,65 metre."</i> <p>This error has been addressed in the Supplementary TA (Doc Ref 7.8.1.11), which also includes an assessment of abnormal load movements associated with the delivery of cable drums to Joint Bay locations along the Onshore Cable Route. The assessment of Joint Bay locations has shown that access will be achievable to all locations without the need for significant highway layout alterations and without generating significant environmental effects.</p> <p>It should also be noted that, as stated in paragraph 2.7.7.3 and 2.7.7.4 of the ES Appendix 22.2 (Framework Construction Traffic Management Plan) (APP-450), the management of abnormal loads and Abnormal Indivisible Loads (AILs) will comply with the statutory regulations in terms of consulting with the relevant highway authority, police and other stakeholders. The routing and timing of abnormal loads and AILs will be agreed and communicated to minimise impact to residents and other road users as appropriate.</p> <p>The Applicant recognises that each of the relevant Highway Authorities have specific guidance pertaining to the movement of abnormal loads and AILs and will adhere to this guidance when programming the movements of AILs across their highway networks as stated in section 2.7.7 of the FCTMP (APP-450).</p> <p>(7, 10 and 11) FCTMP</p>

Theme	Summary of RR
	<p>The TA, ES and Supplementary TA have provided a robust assessment of impacts of construction traffic movements associated with the construction of the Onshore Cable Route. In doing so, the FCTMP (APP-450) sets out a framework strategy for the control, management and mitigation of impacts associated with construction traffic. This includes details of permitted vehicle routing and timings (Section 3), temporary site access requirements (section 5), management of road safety (section 7) and how each detailed CTMP should be implemented and monitored to ensure adherence to all relevant control mechanisms (section 8).</p> <p>(8) Proposed Traffic Management and Programme</p> <p>Appendix 22.2 of the ES (FTMS) (APP-449) sets out the overarching principles and methodology to be used during installation of the Onshore Cable Route. It is necessary to retain flexibility for when the works in the highway are carried out so as to be able to respond to the constraints identified, and in turn mitigate the adverse impacts on the highway as a consequence of construction, and therefore it is not possible to develop detailed proposals for the required traffic management at this time. The details of the required traffic management will be provided prior to commencement of each phase of the works, as is required in accordance with the proposed protective provisions for the protection of highways and traffic included within the dDCO (APP-109), ensuring each highway authority has the opportunity to confirm the proposals accord with the restrictions provided for in the FTMS. The completion of the FTMS at this stage goes above and beyond what would normally be required in relation to construction works and has been completed to inform the assessment of impacts resulting from construction of the Onshore Cable Route.</p> <p>Road closures will be avoided where possible and will only be implemented where it is not possible to install the Onshore Cable Route and provide adequate space for vehicles to safely pass the construction zone. Within PCC highways the requirement for road closures has been identified for part of Farlington Avenue, plus Eveleigh Road and Eastern Avenue should the Onshore Cable Route be installed in these roads. Where road closures are required these will be completed in 100 m sections as per the construction methodology for the rest of the Onshore Cable Route, as is set out in Section 2.3 of FTMS (APP-449). In all cases, pedestrian and bicycle access will be maintained at all times during road closures as will emergency access. Full details of the strategy for providing access to residential properties is included in the Onshore Cable Route Construction Impacts on Access to Properties and Car Parking and Communication Strategy included as Appendix 1 of the FTMS. The FTMS (APP-449) provides a mitigation strategy for the works through the construction programme which includes calendar restrictions which dictate which periods of the year works can be undertaken, and programme restraints which prevent works being undertaken at the same time at sections in close proximity to one another. This will therefore ensure that delays to construction in one location will not result in a cumulative traffic impact beyond that already assessed.</p> <p>(9) Communication Strategy</p> <p>The Onshore Cable Route Construction Impacts on Access to Properties and Car Parking and Communication Strategy included as Appendix 1 of the FTMS. The FTMS (APP-449) provides details of the consultation strategy to be implemented during construction of the Onshore Cable Route. This sets out how the Applicant will endeavour to ensure that local residents, businesses and other stakeholders are fully informed of the works being undertaken. The strategy includes objectives, challenges and mitigation, a working plan and evaluation criteria for the communication element of the construction process. The Applicant therefore welcomes PCC's comments on this document. This strategy will be secured through the FTMS (APP-449).</p> <p>(12) Mitigation Measures</p> <p>The Applicant retains the position that the overarching strategy of mitigation measures set out in the FTMS and the Framework CTMP are suitably comprehensive to adequately mitigate impacts likely to occur as a result of construction. Furthermore, as the construction period is temporary, the Applicant considers that providing funding for permanent schemes to offset temporary impacts is disproportionate. With particular regard to the park and ride scheme mentioned, the Proposed Development is not anticipated to worsen the air quality in Portsmouth and therefore is not required to mitigate air quality within Portsmouth in accordance with the relevant planning and legal tests in this regard.</p> <p>(13) Committed Highways Schemes</p> <p>The Applicant is aware that on 28 September 2020 PCC has secured funding from the Transforming Cities Fund towards the introduction of transport improvement schemes.</p>

^[1] <https://www.gov.uk/esdal-and-abnormal-loads>

Socio-economics	1. Raise the implications of cabling through the highway with traffic disruption resulting in inconvenience to city residents, businesses and visitors.
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2. Request a fund for community benefits to secure localised improvements for road users to mitigate the impacts, including biodiversity enhancement measures at Eastney.
3. Concern regarding the loss of sports provision (football and cricket) and associated parking at sports sites within the Order Limits with no mitigation proposed. Disagree that the magnitude of impact to Farlington Playing Fields/Bransbury Park is moderate adverse, and Langstone is low as without mitigation and the timescale for reinstatement fixtures would be impacted for up to three seasons.
4. It is unclear whether the timing/duration of cabling activity on the playing fields recognises non-availability and prior reinstatement for bird foraging during overwintering periods. Temporary, temporary loss of parking serving the open spaces will affect public access.
5. Consequential effects on the health and well-being of residents due to restricted access to open space and sports facilities.
6. Concern the Application reneges on earlier commitments that work at Milton Allotment would be via HDD resulting in interruption to tenancies of the allotments.
7. The Proposed Development will have significant impact on events (and support to events e.g. off-site camping) through the loss of open space at Farlington Playing Fields. Mitigation measures are required to ensure these can operate.
8. Concern that the works permitted under the draft DCO are too broad for the public open space and allotments and could impact on their long-term use (e.g. the DCO permits bunds, embankments, footpaths, apparatus etc.) with short notice for maintenance works.
9. Further consider significant adverse effects due to temporary diversions of seven PRoWs, four long distance footpaths and an off-road cycle route during construction.

Applicant's Response

1. Traffic impacts on residents, businesses and visitors

Disruption to residences, local businesses and community facilities is identified in paragraphs 25.7.2.13 – 25.7.2.32 of Chapter 25 of the ES (Socio-economics) (APP-140) and comprises vehicular and pedestrian access; noise, dust and visual annoyance; and traffic congestion. Disruption to visitors is identified in paragraphs 25.7.2.42 – 25.7.2.48. Measures to address traffic disruption are also set out in the Framework Traffic Management Strategy (FTMS) (Appendix 22.1A of the ES) (APP-449) and Onshore Cable Route Construction Impacts on Access to Properties and Car Parking and Communication Strategy included as Appendix 1 of the FTMS (APP-449). Measures identified in the ES are set out in the OOCEMP (APP-505) in Sections 5.9 (Traffic and Transport), Section 5.10 (Air Quality) and Section 5.11 (Noise and Vibration), in addition to Section 6 which covers site specific measures and secured under Requirement 15 of the dDCO (APP-019). The FTMS and its associated documents are secured via the protective provisions for the protection of the highway and traffic contained in the update dDCO (Doc Ref).

2. Fund for community benefits

With regard to the request for a community benefits fund, the Applicant considers the mitigation proposed in connection with the Proposed Development is adequate to minimise the adverse impacts associated with it. In addition, the Applicant will continue to engage with the relevant authorities regarding the potential and justification for any planning obligations in connection with the Proposed Development. The Biodiversity Position Paper (doc Ref 7.7.9) sets out the Applicant's position in relation to biodiversity.

3. Loss of sports provision

Residual effects are presented in Table 25.15 of Chapter 25 of the ES, with Farlington Fields and Bransbury Park assessed as moderate adverse, which is significant. They are not assessed as being of a higher significance as there is only partial impact on these sites and the effect is temporary as set out in Table 25.3 of the ES. The duration of impact on the sports pitches at Langstone Playing Fields was considered low due to the duration of works (eight weeks worst case) so the significance of the effect was assessed as moderate – minor after mitigation.

4. Playing fields and overwintering birds

The period for recovery following reinstatement is not included in the assessment and will vary according to duration of works and type of reinstatement used, so recovery may extend beyond period stated in some cases. The ES Addendum details that works will be complete for the over-wintering bird season at Solent Waders and Brent Goose Strategy (SWBGS) sites. All affected sites will be subject to grassland restoration in order to return habitat to optimal condition before October. At SWBGS site P08A Farlington Playing Fields, works will be

complete prior to the onset of the wintering period where intertidal birds return from their breeding grounds. However, re-turfing will likely only be possible at the start of October and is estimated that a minimum of 2-3 weeks would be required for re-establishment of the grass sward required to permit grazing by brent geese, a Qualifying Feature of Chichester and Langstone Harbour SPA and a wintering intertidal bird which feeds on grasses within SWBGS sites. The temporary habitat loss accounts for just 1.2% of the SWBGS core sites and 0.2% of the SWBGS network. There will be no perceptible change to baseline conditions. Brent geese will still be able to utilise the majority of Farlington SWBGS which in itself forms just a small component of the SWBGS network available.

This conclusion is further supported by the fact that the loss of habitat will be temporary, covering at most 17% of a single non-breeding season and during a period when the majority of the Solent Brent Goose population would not be present. Impacts on car parks are included in the assessment of open space at Farlington Fields and Bransbury Park (Table 25.14). The Framework Management Plan for Recreational Impacts (document reference 7.8.1.13) sets out further information on impacts at these sites and measures, including types of reinstatement, that can be used to reduce the magnitude of the effect, including reinstatement and be secured within the OOCEMP as part of Requirement 15 of the dDCO. The Onshore Cable Route Construction Impacts on Access to Properties and Car Parking and Communication Strategy included as Appendix 1 of the FTMS. The FTMS (APP-449) also includes details of alternative arrangements and will be secured as part of the FTMS via the protective provisions for the protection of the highway and traffic contained in the updated dDCO (APP-019).

5. Health and wellbeing

Chapter 26 of the ES, Human Health, covers the importance of greenspace to health and wellbeing (Section 26.5.3) and paragraphs 26.6.3.32 – 26.6.3.52 cover these effects arising from loss of greenspace.

6. Milton Allotments and tenancies

The Applicant confirms that the proposal to use HDD under Milton and Eastney Allotments is maintained in the Application, with no trenched works within the Allotments as confirmed as HDD-2 in paragraph 3.6.4.45 of ES Chapter 3 Description of the Proposed Development (APP-118).

7. Events at Farlington Playing Fields

Appendix 25.5 (Illustrative Phasing of Works at Example Public Open Spaces) of the ES (APP-473) sets out illustrative phasing for construction works on Farlington Playing Fields, which includes provision for over-wintering birds and festival use. Mitigation is also identified which requires the Contractor to review the programme (paragraph 25.9.5.2 of Chapter 25 (Socio-economics)) to reduce duration of effects on open space, for example through concurrent working, and requirements for open space (paragraph 25.9.5.4 of Chapter 25 (Socio-economics)). This includes liaison with event organisers to implement measures to reduce disruption (25.9.6.1 of Chapter 25 (Socio-economics)). This is further clarified in the Framework Management Plan for Recreational Impacts (document reference 7.8.1.13) which sets out further information on impacts at these sites and measures, including types of reinstatement, that can be used to reduce the magnitude of the effect, including reinstatement and be secured within the OOCEMP as part of Requirement 15 of the dDCO.

8. Extent of permitted works

The Applicant acknowledges that paragraph 2 of Schedule 1 to the dDCO proposes to permit further associated development as may be necessary and expedient for the purposes of or in connection with a relevant part of the Proposed Development comprised in Works No. 1 to 5, including the development identified in the relevant representation. The Applicant also notes that such associated development is only permitted where it falls within the scope of works assessed by the environmental statement. Where such associated development is not within the scope of the works assessed in the environmental statement it will not be permissible. This is a standard approach taken in most, if not all, development consent orders, ensuring associated development necessary for the delivery of national significant infrastructure projects is permitted, with the requirement for works to be within the scope of those assessed in the relevant environmental statement providing adequate and sufficient controls to ensure only the assessed scope of works may be carried out pursuant to and in accordance with the development consent order,

9. PRoW

Where intersected, Public Rights of Way ('PRoW') (paragraph 25.7.2.35 of Chapter 25 (Socio-economics)), and Long Distance Walking Routes (paragraph 25.7.2.37 of Chapter 25 (Socio-economics)) in Portsmouth would be diverted (within the Order Limits) for up to four weeks, (1-2 weeks for each circuit), in a worst case scenario. The effect is therefore temporary and not assessed as significant.

A Note on **PRoW**, Long Distance Walking Paths and Cycle Route Diversions has been Appended to the ES Addendum (Appendix 14, Document 7.8.1.14) shows indicative diversion routes for affected PRoW in order to demonstrate minor extent of these diversions.

<p>Air Quality</p>	<p>Concern the traffic impacts (including diversions) will significantly impact air quality, impairing the ability of PCC to achieve its statutory obligations (PCC is in receipt of ministerial directives from DEFRA in respect of air quality), and whilst this refers to areas outside the Order Limits PCC consider diverting trips will impact on directives.</p> <p>Recent Air Quality modelling suggests air quality in Portsmouth is worsening with the areas of exceedance likely to increase from 4 to approximately 12.</p>
<p>Applicant's Response</p>	
<p>Chapter 23 (Air Quality) of the ES (APP-138) assesses the likely effects on air quality in Portsmouth. This includes the assessment of effects on local air quality from road closures and diversions and construction vehicles on the local highway network. The assessment found impacts upon air quality in the city to be largely negligible, with some beneficial and adverse impacts. It should be noted that a replacement of Chapter 23 has been submitted, the reasons for which are explained in the ES Addendum (doc ref 7.8.1).</p> <p>For the Construction Stage, a dust risk assessment, following Institute of Air Quality Management (IAQM) guidance was undertaken for each of the cable sections and is detailed in Appendix 23.2 (IAQM Construction Assessment) of the ES (APP-455), and also identifies mitigation which is included in the Onshore Outline Construction Environmental Management Plan (APP-505).</p> <p>ES Chapter 23 (Air Quality) confirms the impact on air quality during the Operational Stage is negligible as an imperceptible amount of maintenance vehicle traffic will be generated along the cable route and power will be generated using equipment which complies with the latest emission standards (Euro Stage 4).</p> <p>To assess the impact of diversions, road closures and other traffic management on air quality and compliance with Directive 2008/50/EC during construction for the Portsmouth Urban Area Agglomeration Zone (UK0012), modelling was completed using SRTM traffic flow data provided by Systra (2026) and used in the assessment of traffic and transport related impacts in the Transport Assessment (document reference 7.8.1.11) and Chapter 22 (Traffic and Transport) for the 2026 Do-Minimum scenario and two 2026 Do-Something scenarios.</p> <p>The replacement Chapter 23 (APP 138 Rev 002) concludes that the impacts associated with diversions, road closures and other traffic management measures and construction traffic operation are transitory and temporal in nature, and are not predicted to impact on the ability of the Compliance Risk Road Network applicable to the Proposed Development to meet obligations under EU Directive 2008/50/EC.</p> <p>The results of the assessment which modelled two construction scenarios found the temporary diversion of traffic would improve outcomes at the receptor (monitoring) locations where the Defra NO₂ limits would likely be exceeded without the construction work for the Proposed Development. A very small (negligible) improvement will occur at properties adjacent to the M27 which is part of the strategic road network and the responsibility of Highways England, however the predicted concentration will remain above the limit value as is the current situation.</p>	
<p>Cumulative Effects</p>	<p>PCC do not consider the potential for cumulative effects and co-ordination with other developments have been adequately assessed. Specific reference is made to the Coastal Flood Defence works (construction impacts associated with HGV movements, available compound space, and potential impacts on wildlife and overwintering birds given the overlapping construction periods) and Fraser Range housing development.</p> <p>Consider the HRA in-combination assessment defers to the onshore ecology cumulative effects assessment, disagree with the screening out of cumulative effects of the Phase 4 sea defence project on the basis that it "...will not interact with the Proposed Development to lead to cumulative effects" due to the potential for the cable route and construction works to impact mitigation measures incorporated into the works to avoid an adverse effect on the SWBGS sites.</p>
<p>Applicant's Response</p>	
<p>The list and status of Committed Developments included within Appendix 29.3 (Collated Onshore Long and Short List of Developments) of the ES (APP-485. An addendum to the Cumulative Effects (doc ref) is submitted to the ExA alongside this response and includes an updated assessment for the Phase 4B North Portsea Island Coastal Defence Scheme, granted planning permission in February 2020.</p> <p>Both Fraser Range (development ID 66 in our assessment) and North Portsea Island Coastal Flood Defence Scheme (development ID 62 in the Applicant's assessment) were included in the short-list for inclusion in the inter-project cumulative effects assessments as Tier 1 developments. Both developments were considered to overlap in construction periods with the Proposed Development with the potential to cause cumulative effects assessed for each environmental topic. No significant cumulative effects are identified.</p>	

Measures to avoid impacts on Solent Waders and Brent Geese are provided for within the winter working principles detailed at section 6.2.1 of the OOCEMP (APP-505), secured by Requirement 15 to the dDCO (doc ref).

Cumulative Effects (ESCP Flood Defences)

PCC raise specific matters regarding the Coastal Flood Defence works including the:

1. potential impact on landscaping/screening to be installed as part of the Phase 4 works to mitigate disturbance to birds using the Core Solent Waders and Brent Goose Strategy (SWBGS) site (P11) from re-routing of the footpath landward of the Andrew Simpson Watersports Centre/Tudor Sailing Club.
2. potential impacts on access to the NPI construction compounds/haul roads between Airport Service Road and the northern end of Milton Common, including the realignment of the highway south of the Langstone Harbour Viewing Car Park.
3. concerns regarding overlap with mitigation areas ESCP propose on Milton Common to offset the impact of the construction compound.
4. concerns on adequacy of the mitigation to reflect the overlap in construction of the ESCP and the Proposed Development need to ensure any flood defences are retained or replaced, to ensure the same level of flood protection is maintained.

Applicant's Response

As stated in ES Chapter 20 (Surface Water Resources and Flood Risk) (APP-135) (paragraphs 20.7.5.6 to 20.7.5.8) works adjacent to the coastal flood defences have been developed in consultation with ESCP, and it has been agreed in principle that the design will avoid works to all but one of the existing or proposed coastal flood defence alignments. The one interaction between the Proposed Development and the coastal defence to the north of Milton Common is proposed to be crossed via HDD, with the acceptability of this approach in principle discussed with and accepted by ESCP. The implementation of these works will be subject to the need to obtain relevant environmental consents prior to construction. Co-ordination of proposed landscaping associated with the proposed coastal flood defence schemes and the Proposed Development will be considered at this stage.

Regarding the landscaping associated with the re-routed footpath, the Proposed Development will seek to avoid areas of landscaping in the small areas where the applications overlap. If that is not possible, any landscaping affected will be reinstated like for like in accordance with Requirement 7 (Provision of Landscaping) of the dDCO (APP-019) and where necessary any screening/mitigation functions maintained through temporary hoarding during the works. A Communications Strategy has been developed and incorporated into the updated OOCEMP (APP-505 Rev 002) which will require consultation between the Applicant and ESCP to seek to schedule their works to avoid conflicts where possible.

The Applicant has liaised with ESCP regarding their planned works, including the opportunity of using the construction compounds after ESCP have completed their development, reducing impacts relating to site set-up and reinstatement (including landscaping). Further it is proposed that works at the north end of Milton Common will occur after ESCP have finished construction. The Applicant has agreed principles with ESCP (in a meeting on 15 May 2019) to safeguard the existing and proposed defences and are comfortable that there is enough flexibility within the Order Limits to implement the Proposed Development alongside the approved ESCP works, including the approved highway realignments. The Applicant is committed to continue to work with ESCP to ensure that the detailed design maintains this position.

The following potential effects have been identified which have the potential to act cumulatively between the Proposed Development and ESCP Phase 4b:

1. Habitat loss within Milton Common SINC;
2. Disturbance of birds within Chichester and Langstone Harbours SPA; and
3. Disturbance of birds in SWBGS including effects on ESCP mitigation areas.

Habitat loss within Milton Common SINC

Details on the baseline environment and important ecological features at Milton Common is located within ES Chapter 16 (Onshore Ecology) (Ref APP-131), paragraphs 16.5.1.6 to 16.5.1.11.

The cumulative effect of the two developments is considered to be the same as that detailed for the Proposed Development alone and therefore not adverse. The impacts will be temporary with complete recovery highly likely while the ESCP mitigation sites characterised as enhanced management to attract SPA birds so providing an additional resource within the SINC rather than any habitat loss. Therefore, there is no prospect of the Proposed Development contributing to a cumulative impact with ESCP Phase 4b with respect to habitat loss.

Disturbance of birds within Chichester and Langstone Harbours SPA

Following the key Principles outlined in ES Appendix 16.14 (Winter Working Restriction for Features of Chichester & Langstone Harbours SPA) (Ref. APP-422), all potential effects from the Proposed Development are avoided or mitigated. Furthermore, the ESCP Phase 4b proposal has a complete winter working restriction. Therefore, there will be no cumulative effects on non-breeding features of Chichester and Langstone Harbours SPA. Breeding tern features of the SPA are distant from both proposals and as outlined in Appendix 16.13 (Wintering Bird Survey Report) (Ref APP-421), no foraging terns were recorded adjacent to the Order Limits in Langstone Harbour. Therefore, there will be no cumulative effects on breeding features of Chichester and Langstone Harbours SPA.

Disturbance of birds in SWBGS including effects on ESCP mitigation areas

The application of Principle 3 as outlined in ES Appendix 16.14 avoids the prospect of the Proposed Development having any direct impacts on SWBGS sites. Therefore, although the ESCP Phase 4b proposal will have direct effects on SWBGS due to placement of compounds within them, the Proposed Development will not contribute to an impact in cumulative terms.

The two proposed compounds as part of the third party 19/01368/FUL project are located within SWBGS sites are noted to no longer form part of the details for approval of the relevant condition of this permission.

In any event, it is anticipated that the Onshore Cable Route would progress through the corridor adjacent path which runs from north to south through Milton Common, parts of which form the ESCP coastal flood defences. If this route is followed, there is no direct overlap with the (no longer proposed) ESCP Phase 4b mitigation areas nor their integrity.

Given the nature of the ground conditions associated with Milton Common’s former landfill use, flexibility is maintained to include two alternative routes within this section for the Onshore Cable Corridor. Further details on these routes are provided within paragraphs 3.6.4.34 to 3.6.4.39, ES Chapter 3 (Description of the Proposed Development) (APP-118). Should one of these alternative routes be selected, this would directly overlap with the previously proposed southernmost ESCP Phase 4b mitigation area. Were that to be brought forward, noting the details to discharge are at the time of submission of these responses yet to be approved, in order to prevent any compromise of the mitigation areas in terms of habitat quality and attractiveness to non-breeding birds, the Applicant would propose to avoid damage to grassland sward, particularly in the growing season.

Surface Water Resources and Flood Risk	PCC consider the ES is inaccurate, and that Environment Agency Flood Maps show the site of the ORS to be within Flood Zone 3 (identified as Zone 2 in the ES). This means that a full sequential test should be applied and met assessing locations with a lower risk of flooding.
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Applicant’s Response

Chapter 20 (Surface Water Resources and Flood Risk) of the ES (APP-135) was accurate at the time of writing and submission of the Application. Since submission of the Application it is recognised that the extent of Flood Zone 2 and Flood Zone 3 has changed on the Environment Agency (EA) Flood Map for Planning.

The Applicant’s flood risk consultant engaged with the Environment Agency on 24/03/2020 and the Environment Agency confirmed that the Flood Map for Planning was updated in late January 2020 to account for tides and / or waves above the still water level. WSP has recently received the updated modelling results from the Environment Agency and has undertaken a review of the existing sequential and exception test already undertaken as part of the Flood Risk Assessment (FRA) (Appendix 20.4 of the ES (APP-439)) to reflect the changes. The updated Sequential and Exceptions Test (document reference 7.8.1.9) evidences that the sequential and exceptions test is met.

With specific reference to the Optical Regeneration Station (ORS) and requirements contained in NPPF 2019 & EN-1 ensure ‘*the development will be safe over its lifetime [...] as part of the exception test, appropriate flood risk mitigation is detailed within Section 6.2.4 of FRA.*

In support of this the Environment Agency stated on 24/03/2020:

“Following on from our telephone conversation a while ago, and your subsequent email dated 13 March, I have had an opportunity to discuss the landfall and ORS building in Eastney with our flood risk technical specialist. I can confirm that despite the building now being in Flood Zone 3, we are absolutely still comfortable with the building being located there based on its usage (i.e. non-residential) and the approach you have already outlined regarding in-built mitigation.”

Cumulative Impact - Impact on Coastal Flood Defences	The project proposes HDD from Farlington to the north-west of Kendall's Wharf to avoid impacts on Langstone Harbour and Phase 1 of the North Portsea Island (NPI) coastal defence scheme. The project identifies a construction compound use of the yard to the south-west of Kendall's Wharf. Depending on timing there is the potential for conflict with delivery of NPI Phase 4 coastal defence works that already has its construction compound there.
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Applicant's Response

As identified above, the Applicant has undertaken detailed engagement with ESCP regarding their planned works, including the opportunity of using the construction compounds after ESCP have completed their development taking due consideration of potential conflicts in programmes which are recognised and will be considered during detailed design and construction programme planning and implementation. The updated OOCEMP (doc ref **505 rev 002**) submitted alongside this response secures a communications strategy, which will include engagement with ESCP to seek to avoid conflicts between the concurrent construction aspects of both schemes.

Impact on Coastal Flood Defences

Across Milton Common, it is anticipated that the cable will progress through the corridor adjacent to the path which runs from north-to-south through the Common, parts of which form the coastal flood defences. At the northern part of the coastal defences, a short HDD will be required below the bund of the coastal defences. The cable would then continue south, adjacent to the path to the south-east corner of Milton Common. This suggests that only the crossing of the secondary defence will be HDD and the remainder of the route across the common will be open trenched.

Applicant's Response

The Applicant confirms that this statement is correct. Specific mitigations to protect from flood risk associated with the HDD pathway have been discussed and agreed in principle with ESCP and reference to these is included within the SoCG with PCC.

The Environmental Permit for the crossing of the flood defence (as detailed in Table 2.1 of the Other Consents and Licences document (APP-106)) is subject to a separate consenting and licencing regime which will be secured as required at the relevant time with the Environment Agency in accordance with Section 4.10 of the Overarching National Policy Statement for Energy (EN-1).

Ecology – Solent Waders and Brent Geese Strategy (SWBGS)

The HRA (ref 6.8.1) (Habitats Regulations Assessment Report (APP-491) and the Winter working restrictions (ref 6.3.16.14) (Environmental Statement - Volume 3 - Appendix 16.14 Winter Working Restriction for Features of Chichester & Langstone Harbours (APP-422)) documents indicate that no works will be undertaken in SWBGS core, primary or secondary sites during October to March. The project must ensure that it would not inadvertently impact on the mitigation areas ESCP propose on Milton Common to offset the impact of the NPI Phase 4b Compound 6 on the SWBGS core site P23R during the winter during construction works.

Applicant's Response

It is noted that the mitigation areas ESCP propose on Milton Common to offset the impact of the NPI Phase 4b Compound 6 on the SWBGS core site P23R during the winter during construction works are not proposed in the most recent details submitted to discharge the relevant condition. This point has, in any event, been addressed above.

Heritage (ORS)

PCC have concerns regarding the two ORS buildings and associated equipment at landfall and impact on the existing car park which it considers nestles inconspicuously into the scrubland character of the adjacent open space. Considers the ORS will significantly affect the setting of Fort Cumberland, a Scheduled Monument due to prominent siting in the car park within the 'fields of fire' from the ravelin towards Fort Cumberland Road.

Consider any development needs to sustain and enhance the significance of heritage assets and make a positive contribution to the distinctiveness of the local area, and the ORS needs to be more sympathetically designed and assimilated amongst other built-form rather than prominently sited in the open coastal plain and setting of heritage assets.

Archaeology has not been properly considered or addressed. Requirements will be needed to ensure the archaeological value of the area is not prejudiced.

Applicant's Response

Paragraphs 21.6.2.31-35 of Chapter 21 (Heritage and Archaeology) of the ES (AP-136) identifies the proposed ORS compound would result in a small magnitude of change to Fort Cumberland. The impact is considered to be negligible in respect of views, based on the distance from the asset and the presence of the modern residential housing estate, located 15 m to the north-west of the proposed ORS compound.

It further confirms that although the car park does not currently contribute to the setting of the fort, it remains predominantly flat, allowing continuation of the historic 'fields of fire' from the western ravelin. Appendix 21.2 (Historic Environment Desk Based Assessment of the ES (AP-442)), Figure 17 (Southwest-facing view towards the Landfall from the boundary fence of Fort Cumberland (A96)) shows the south-west facing view from the base of the fort. When viewed from this distance the ORS compound will be viewed against the existing urban fabric and will not affect how the fort is currently experienced, nor the understanding of the historic fields of fire.

The Applicant does not agree that the introduction of the ORS compound would significantly affect the setting of Fort Cumberland. As per Step 3 of Historic England's Guidance (Historic England, 2017), the Proposed Development has been assessed on whether the overall significance of the asset, or the ability to appreciate it, has been affected. Although the western ravelin may have slight views of the proposed ORS compound, the western view as shown in Viewpoint 22, Figure 15.56 of the ES (APP-289), which was taken 200 m to the east of the car park at the Landfall, shows that the views across the open coastal plain currently cease at the car park. Considering this view, the overall effect is negligible as the ORS compound would sit within the surrounding urban fabric, which comprises a nearby housing estate and a holiday park which is bounded by tall trees and would not be visually intrusive from the ravelin itself (which is raised) resulting in no harm.

Chapter 15 (Landscape and Visual Amenity) of the ES (APP-130) identifies that during operation there would be major-moderate to moderate-minor adverse permanent medium term localised significant effects for immediate residents and recreational users adjacent to the Landfall (paragraph 15.8.15.1) which would reduce to moderate-minor adverse (not significant) as mitigation planting in the form of a native hedgerow, hedgerow trees and trees matures.

Several options were explored for the location of the ORS (paragraphs 2.6.6.22-25 of ES Chapter 2 Consideration of Alternatives (APP-117), including various configurations within the car park itself. Taking all options into account and considering other environmental constraints, the location on the northern edge of the car park was considered the most appropriate to minimise potential impact on Fort Cumberland and also to retain continuous views to Fort Cumberland Road. Prior to examination, additional visualisations reusing an existing viewpoint (Viewpoint no. 22 from the Landscape and Visual Amenity assessment; (APP-289, Rev02)) have been produced, to inform design and positioning of the proposed ORS building within the Landfall car park. The additional visualisations are contained within Appendix 5 of the ES Addendum (document reference 7.8.1.5). These provide a representation of the proposed ORS from the area near the fort's western ravelin, represented as a single block for each building (with each of the siting options shown individually). Further information is also available within the updated Sequential and Exception Test Addendum (document reference 7.8.1.9).

The buildings contained within the ORS compound have been designed to be lower than existing prominent structures within the open coastal plain, such as the nearby houses and line of trees associated with the holiday park, which have obstructed the historic continuous long views to the west. The parameters for the ORS compound are secured by Requirement 5 to the dDCO. The detailed design of the ORS buildings and accompanying landscape mitigation is to be developed in line with the Design Principles, and subject to detailed design approval This is secured by dDCO (APP-019) Requirement 6 (Detailed design approval) and Requirement 7 (Provision of landscaping) requiring the detailed design for the ORS compound and landscaping proposals to be submitted to and approved in writing by the relevant planning authority

Potential construction stage effects on possible Archaeological remains within the proposed landfall site have been identified and reported in Chapter 21 (Heritage and Archaeology). A strategy has been agreed with the Hampshire County Council Archaeological Advisor (as advisor to PCC), that evaluation within brownfield areas will be carried out, where appropriate, to clarify the presence, nature, date and significance of any archaeological remains that may be present. This will inform a suitable mitigation strategy, which would be outlined in a Written Scheme of Investigation in accordance with Requirement 14 Archaeology, of the draft DCO which requires details to be submitted and approved by the relevant planning authority.

Design and Access

Identify the indicative parameters plan as functional in form. Consider the ORS structures would be dispiriting and out of place, not meeting the principles of 'good design' and having a significant adverse landscape and significant impact upon visual amenity. Proposal must meet requirements of the NPPF to demonstrate harm to heritage significance has been minimised as far as is possible through careful design.

Applicant's Response

The appearance of the ORS buildings will be determined post consent, in accordance with the defined parameters plans. The submitted drawings are illustrative to provide an illustration of the scale and massing of the proposed structures. The final design will be in accordance with the Design Principles within section 6.3 the updated Design and Access Statement (**APP-114**) submitted alongside this response which accord with the policies within EN-1 and the NPPF.

The DAS sets out how the Applicant has taken into account both functionality (including fitness for purpose and sustainability) and aesthetics (including its contribution to the quality of the area in which it would be located and the sensitivity of its location) as far as possible. The ORS will also be subject to detailed design approval in accordance with Requirement 6(3) of the dDCO (APP-019).

The ORS has been assessed within ES Chapter 21 Heritage and Archaeology (APP-136) section 21.6.4.27 to 31 as likely to have a direct, permanent, long-term effect on Fort Cumberland of negligible significance prior to the implementation of mitigation measures. It has been agreed with Historic England that the ORS buildings will lead to less than substantial harm to the significance, and in accordance with the policies within the NPPF that this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

Further information regarding the ORS and its compliance with applicable policies in relation to design and the characteristics of the national design guidelines is provided at document reference 7.4.1.2.

**Arboriculture
(Landscape)**

The loss of any tree, including those of such amenity value to warrant protection by TPO, must be avoided. The DCO application requirement for felling of any trees, including those protected by TPO, is not considered acceptable.

PCC advise that they do not normally permit the removal of TPO trees under its guardianship.

Concern is raised on the potential felling of a number of TPO and non-TPO trees. Any mitigation planting should be engineered to compensate for the total current eco-system service to be lost. Impacts of a loss of established or mature trees cannot be compensated for in the shorter-term by equivalent numbers of replacement (smaller) tree planting

Applicant's Response

Appendix 16.3 (Arboricultural Report) of the ES (APP-411) describes the baseline arboricultural information and assesses the potential direct and indirect impacts of the worst-case scenario with regards to the Proposed Development. As highlighted in Section 1.6 of the Arboricultural Report, "Trees present constraints to development by physically obstructing a design and the resulting technical, legal and social challenges that may arise."

The mitigation measures secured in section 5.3.4 Arboriculture and sections 6.3 to 6.11 of the OOCEMP (APP-505) require the Proposed Development to avoid high and medium value features where practical. Consequently, the design will seek to avoid positioning cables in conflict with the Root Protection Areas (RPAs).

The Applicant met with the PCC Tree Officer (29 October 2019) to discuss TPOs within the PCC area. At this meeting, it was highlighted to PCC that the Arboricultural Report (APP-411) describes the baseline arboricultural information and assesses the potential direct and indirect impacts of the Proposed Development. The purpose of the meeting with PCC was to ensure the worst-case impacts are assessed and therefore considered when the application is determined. Potential mitigation measures to minimise impacts on trees were then discussed in line with the wider mitigation strategy. A summary of the outcomes of these discussions are as follows.

Group G64 (TPO 75) is reported to be a high value feature within the Arboricultural Report. The potential for the felling of this group of trees is due to the location of the RPA associated with these trees extending into the Order Limits. The Application has been assessed in accordance with the guidance contained within the Planning Inspectorates Advice Note 9: Rochdale Envelope, in that the impacts were assessed on a worst-case scenario, which may be negated following detailed design completion, which will seek to avoid arboricultural assets where possible.

For Section 7 of the Onshore Cable Route, Chapter 15 (Landscape and Visual Amenity) of the ES acknowledges that if the Onshore Cable Route runs to the west of the Baffins Milton Rovers FC there would be moderate adverse temporary short to medium localised significant effects (paragraph 15.8.12.3) on landscape features including trees. Section 1.7.8 of the Arboricultural Report (APP-411) highlights the baseline arboricultural condition and provides recommended mitigation measures. These include that the final design will avoid positioning cables in conflict with RPAs of existing trees, where practicable. Where significant incursion is unavoidable, trees must be replaced. The report further advises that the Onshore Cable Route will avoid impacting on medium value arboricultural resources through traversing between the RPAs of lower quality arboricultural resource where practicable. No high value arboricultural features were identified in Section 7. Mitigation is secured in Requirement 15 of the dDCO (APP-019), with the detail contained within section 6.8.1 of the OOCEMP.

Articles 41 and 42 of the dDCO provide powers in relation to the removal of trees and hedgerows. An explanation of those powers is provided at paragraphs 11.4 – 11.5 of the Explanatory Memorandum (APP-020). As has been explained above, mitigation measures in relation **to the removal of trees in connection with the Proposed Development are secured in Requirement 15 of the dDCO (APP-019) with the detail contained within section 6.8.1 of the OOCEMP and required to be complied with in accordance with Requirement 15 of the**

dDCO. Those powers when exercised subject to the mitigations provided for in the OOCEMP are considered entirely appropriate and are necessary to ensure the Proposed Development can be delivered.

Ground Conditions (Contamination)

PCC raise that there are parcels of land with significant pollution along the route and would have expected a detailed assessment as part of the application. Advise a desk study review of available records has been started but not completed and request a conceptual model to BS10175.

Request a Watching Brief and Remediation Method Statement for the entire route for any unexpected areas of pollution that may be encountered. Quality of restoration soils left at the surface should be proven clean and documented via a verification report.

The ES should have included a plan showing areas that have historical uses.

Applicant's Response

As part of Section 10 of Appendix 18.1 (Preliminary Risk Assessment and Generic Quantitative Risk Assessment) of the ES (APP-429) areas of significant site contamination along the route and areas that have been previously remediated have been assessed. The available council records relating to previous site investigations for ground conditions along the route including ground investigation reports on Milton Common and Fraser Range, engineering reports / drawings in regard to Milton Common Landfill, remediation reports of areas along and surrounding the route and desk study reports for areas along and surrounding the route were reviewed.

The findings from the reports obtained from the councils, along with information obtained from historical maps, British Geological Survey the Environment Agency and WSP previous ground investigations (April – May 2018 and August 2018) a Conceptual Site Model (CSM) was constructed. The method used within the construction of the CSM followed a risk-based approach with the potential environmental risk assessed qualitatively using the 'source-pathway-receptor' contaminant linkage concept introduced in the guidance documents (principally the EA's CLR11) on the practical implementation of the Environmental Protection Act 1990. Using the EA's CLR11 guidance an environmental risk can be defined as the combination of the consequence of a harmful effect and the probability of its occurrence. The CSM environmental risk assessment has been carried out by identifying and evaluating the significance of the following:

- Potential Sources of Contamination: these include any actual or potentially contaminating materials and activities, located either on or in the vicinity of the scheme;
- **Potential Pathways for Contamination Migration: these are the routes or mechanisms by which contaminants may migrate from the source to the receptor; and**
- Potential Receptors of Contamination: these include present or future land users, activities or persons at the scheme.

The CSM can be found in Section 10 of Appendix 18.1 (Preliminary Risk Assessment and Generic Quantitative Risk Assessment) of the ES (APP-429)

A ground investigation was carried out by WSP in 2018 (April – May and August) to investigate potential contamination sources identified in the desk study report including historical landfills and petrol stations. The ground investigation comprised trial pits, boreholes and window samples being excavated and the soil and groundwater sampling and laboratory chemical testing to be carried out.

In order to undertake a GQRA (Stage 2) on the data, contaminant concentrations need to be compared to appropriate Generic Assessment Criteria (GAC). Current UK industry practice is to use, as first preference, UK soil guideline values (SGVs) which are GAC published by the EA and derived using the Contaminated Land Exposure Assessment (CLEA) model. Where these are not available and in order to provide a consistent methodology for the assessment of various contaminants a series of GAC screening values have been calculated by WSP using CLEA V1.071, a computer modelling tool designed to assess human health related risks posed by contaminated soil.

The results of the GQRA showed that the majority of the Onshore Cable Corridor represents a Low risk to Human Health Receptors and Controlled Waters Receptors, however Milton Common was given a Moderate risk rating due to extensive Made Ground and risks associated with landfill waste, however with mitigation the risk will be negligible. The soil and groundwater testing undertaken to date does not indicate elevated levels of contaminants that would represent a risk to potable water supply pipes and the cable itself and therefore the risk is considered was considered to be low.

The results of the ground investigation can be found Appendix 18.1 (Preliminary Risk Assessment and Generic Quantitative Risk Assessment) of the ES (APP-429).

It is considered by the Applicant that the assessment undertaken is proportionate and appropriate and that adequate controls are in place to ensure any contamination encountered during the carrying out of the Proposed Development is correctly dealt with in liaison with the relevant statutory authorities to ensure sufficient oversight of those operations.

Further ground investigation may be undertaken by the appointed contractor in the future if required to support the discharge of Requirement 13. If required, further ground investigation would generate specific data in terms of ground conditions to further inform the mitigation specified in the OOCEMP (APP-505), ultimately forming part of the information, to be submitted and approved with the relevant planning authority under Requirement 15 of the dDCO.

Requirement 13 of the dDCO (APP-019) requires a written scheme of investigation to be submitted to and approved by the EA, the statutory body with responsibility for dealing with such matters. Requirement 13(1) confirms that no phase of the authorised development landwards of MHWS may be carried out until a written scheme applicable to deal with any contamination, including in respect of groundwater, has been approved by the relevant LPA and the EA. Requirement 13(3) also imposes an obligation on the contractor to submit an investigation and assessment report to deal with the contamination of any groundwater where encountered, with remediation being required to be carried out in accordance with the approved scheme (Requirement 13(4)) and for a verification report relevant to the remediation scheme undertaken to be submitted following the scheme's completion (Requirement 13(5)). Any longer term monitoring and maintenance is also provided for at Requirement 13(6). As already stated, all of this requires consultation with the EA who are the appropriate public and statutory authority for managing such risks.

The ES includes plans showing areas that have had historical uses including infilled reservoirs / pond, landfills, hospitals, past military uses, sewage pumping stations, sand and chalk pits, sewage works, railway lines, previous canals, factories, works, riffle ranges and electrical substations etc. These plans (Constraints Sheets 1 to 5) are provided in APP-297 to APP-299.

It is considered by the Applicant that the assessment undertaken is proportionate and appropriate and that adequate controls are in place to ensure any contamination encountered during the carrying out of the Development is correctly dealt with in liaison with the relevant statutory authorities to ensure sufficient oversight of those operations.

Ecology	Consider greater clarity on the final cable route is required to assess the potential for significant effects on bird disturbance to the Solent SPAs and Functionally Linked Land.
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Applicant's Response

Chapter 16 (Onshore Ecology) (APP-131) of the ES assesses the worst-case impacts on biodiversity features including statutory and non-statutory designated sites, including Sites of Special Scientific Interest. Furthermore, the Habitat Regulations Assessment (HRA) (APP-491) assesses impacts on European designated sites including Special Protection Areas ('SPAs') and Special Areas for Conservation. Both the ES and the HRA are supported and informed by Appendix 16.14 of the ES (Winter Working Restriction for Features of Chichester & Langstone Harbours SPA) (APP-422) which addresses disturbance impacts on bird features of Chichester and Langstone Harbours SPA and Solent Wader and Brent Goose Strategy (SWBGS) sites which are considered functionally linked to the SPA. The principles outlined in Appendix 16.14 are formulated in order to avoid impacts on SPA features including brent geese. It is considered sufficient information is provided regarding the potential for effects from both an EIA and HRA compliance perspective. Potential cumulative effects on SPAs and Functionally Linked Land (SWBGS) have been considered for the addition ESCP development in the ES Addendum. The mitigation required including the winter working restrictions are to be secured via the OOCEMP.

2.7. WINCHESTER CITY COUNCIL (RR-198)

Table 2.7 – Winchester City Council

Theme	Summary of RR
Consultation	The Council raise questions regarding the level of engagement by Aquind with the local communities of Denmead and Hambledon.
Applicant's Response	
As set out at paragraph in the Statement of Community Consultation (SoCC) (APP-025) the Applicant met with officers from the relevant local planning authorities (LPAs), including Winchester City Council (WCC) on 13/08/18. This was followed by informal consultation for 28 days with the relevant LPAs, as a consequence of which the Applicant extended the proposed Primary Consultation Zone in the vicinity of the Lovedean/Denmead area. The formal consultation on the SoCC is described in Section 12.1.3 of APP-025 and ID 3 in Table 12-1 confirms that the SoCC was shared with Denmead, Horndean and Southwick & Widley Parish Councils in addition to the planning officers and elected members of the relevant LPAs. Table 14-3 (APP-025) lists the council and community briefings undertaken including with Denmead and Horndean Parish Councils and WCC.	

Theme	Summary of RR
	<p>The Planning Inspectorate accepted the application for the Proposed Development on 12 December 2019, with the section 55 checklist stating the Applicant did consult applicable persons set out in s42 of the PA2008 about the proposed application (s42 of the Planning Act 2008) (PA2008), did notify the s42 consultees of the deadline for receipt of responses (s45 of the PA2008) and did prepare a SoCC including consulting the relevant LPAs, including WCC, had regard to responses received when preparing the SoCC, made the SoCC available for inspection, stating that the development was EIA development and carried out the consultation in accordance with the SoCC (s47 of the PA2008). Accordingly, the Applicant considers that adequate consultation was undertaken with local communities including Denmead and Hambledon in accordance with the SoCC.</p>
Alternative	<p>Option of considering a route for the cable across the open countryside to the west of the A3 has not been properly assessed as an alternative to the road route.</p> <p>Lack of detail in the evidence base for the choice of Lovedean over other alternatives and the degree to which the proximity to the National Park played in that decision. Correspondence with NGET should be included.</p>
Applicant's Response	
<p>Further information regarding the consideration of the 'Countryside Route', including the Applicant's reasoning for why this was not chosen as the preferred Onshore Cable Corridor in this location, is provided in the Supplementary Alternatives Chapter (doc ref 7.8.1.3) submitted to the ExA alongside this document.</p> <p>The Supplementary Alternatives Chapter also provides further information regarding how the potential for impacts on the SDNP were considered in relation to proposed connections at both Bramley Substation and Lovedean Substation. With regards to Lovedean Substation the potential impacts on SDNP related to the location of the Converter Station area in close proximity to the existing Lovedean Substation. A proportionate and appropriate level of information regarding the consideration of the reasonable alternative grid connections points is provided within Chapter 2 to the ES (APP-117) and the further clarifications provided in Supplementary Alternatives Chapter submitted as part of the Environmental Statement Addendum, including with regard to information provided by NGET. The studies undertaken by NGET are subject to confidentiality requirements and for this reason have been appropriately summarised in the information submitted.</p>	
Landscape and Biodiversity	<p>The Council raise concerns regarding the Converter Station's proposed countryside location and question if sufficient mitigation or enhancements are being offered in respect of the proposed development's landscape and biodiversity impacts. The Council also consider that the landscape and biodiversity mitigation work need greater security in terms of delivery, maintenance and future management.</p>
Applicant's Response	
<p>The reasons which led to the choice of Lovedean Substation as the preferred grid connection point and the location of the converter station in the location identified within the Application as part of the Proposed Development are explained in Chapter 2 to the ES (APP-117) and the Supplementary Alternatives Chapter submitted as part of the Environmental Statement Addendum [doc ref 7.8.1].</p> <p>Requirements 7 and 8 of the dDCO require the provision and approval of a detailed landscaping scheme, which is to accord with the OLBS, prior to the commencement of Works No.2 (relating to the converter station area) and the implementation and maintenance of the landscaping in accordance with the approved detailed landscaping scheme respectively. The detailed landscaping scheme is required to include detailed landscape mitigation plans together with management, maintenance and monitoring plans (paragraph 1.1.3.5 of the OLBS). It is also required to include management responsibilities in accordance with paragraphs 1.7.1.3 to 1.7.2.2 of the OLBS. The Applicant looks forward to discussing further the OLBS with WCC to seek to address any continuing they may have regarding the landscaping proposed.</p> <p>Agreement is being sought with the appropriate landowners for the long-term maintenance and management of existing planting and retained hedgerows, and powers of compulsory acquisition are sought to acquire the rights to do for in the event a voluntary agreement is not reached with those persons. This is to ensure the existing planting which provides a screening mitigation function is retained for this purpose.</p> <p>The Applicant's position with regard to the proposed biodiversity enhancements is clearly explained in the submitted Biodiversity Position Paper (Doc Ref 7.7.9).</p>	

Theme	Summary of RR
	Requirement 9 of the draft DCO secures the need for a written biodiversity management plan, which accords with the OLBS, to be submitted to and approved by the relevant local planning authority in consultation with the relevant statutory nature conservation bodies, and where appropriate the Environment Agency, prior to the commencement of Works No. 2 (relating to the Converter Station Area) and for this to be carried out as approved.
Design & Access	Evidence base for the choice of 85.1m AOD as the finished floor level should include exchanges of correspondence with consultees on why this limit was set. The building design principles need further refinement.
Applicant's Response	
<p>The Applicant carried out ground investigations (both intrusive and non-intrusive) in 2018/19. The Ground Investigation at the Converter Station location found that the area beneath the proposed Converter Station is directly underlain by head deposits consisting predominantly of gravelly Clays, with Structureless Grade D Chalk below. Surveys were also undertaken to identify potential karstic features. The surveys located three potential karstic features of which two are within the proposed footprints for Converter Station option B(i) and option B(ii).</p> <p>The area beneath the proposed Converter Station is known to be underlain by a Principal Aquifer (chalk), designated as the Aquifer Source Protection Zone 1 ("SPZ1"). A considered approach must be taken for the SPZ1 to mitigate any potential contamination, turbidity or groundwater issues arising because of the construction, operation and maintenance activities over the design life of the development. To ensure any contamination of the aquifer is avoided and considering the assessment of the potential for a cut and fill exercise to be undertaken, +84.80m AOD was identified as the most appropriate Converter Station finished site level. Following an initial Flood Risk assessment, the Converter Building finished floor level has been proposed at 85.10m AOD (300mm above finished site level). Therefore, for the basis of the EIA assessment, +85.10m AOD finished floor level has been used with a maximum building height of 26 m with a cap of +111.10m AOD.</p> <p>The Applicant through the design meetings with WCC, EHDC and SDNPA has prepared a series of Design Principles. With regard to the finished floor level, the DAS (APP-114) includes Design Principle 2 which requires the design to seek "to integrate the proposed Converter Station and associated infrastructure into the surrounding topography, as far as practicable within operational requirements and environmental constraints". Requirement 6 of the dDCO (APP-019) requires details of how those details accord with the design principles. The Applicant looks forward to continuing discussions with WCC regarding the potential refinement of the design principles.</p>	
Landscape	The Council consider that the building design principles of the Converter Station need further refinement. The cladding needs to be a darker recessive colour.
Applicant's Response	
<p>Six design meetings were held with WCC, SDNPA and EHBC following the Section 42 Consultation to inform the development of the Design Principles and during which the cladding colour was discussed. The Building Design Principles had been developed following the detailed discussed and consensus expressed by the attendees at the previous design meetings. The Applicant will continue to seek agreement of the building design principles with WCC.</p> <p>The Design Principles outlined in the DAS (APP-114) provide a range of colour gradings from a palette of autumnal colours to complement the surrounding landscape and include a colour grading across the building from dark to light. Requirement 6 Detailed design approval of the dDCO (APP-019) requires details of how those details accord with the design principles. However, the Applicant acknowledges that WCC considers that Building Design Principle 3 needs further refinement and that the cladding needs to be a darker recessive colour. A further design meeting has held on 25 August 2020 with WCC, SDNPA and EHBC to progress discussions around the cladding colours. At the meeting on 25 August 2020 it was agreed that a further design meeting will be held in due course to discuss a revised colour palette. The status of these ongoing discussions will be reflected in the SoCGs with the respective local authorities as they progress.</p>	
Landscape	The Council question the method of securing suitable control over the long-term retention of landscape features on land not intended to be purchased is unclear.
Applicant's Response	
Acquisition of rights over existing landscaping features is sought to ensure the existing landscaping which is to serve a screening function can be adequately enhanced and maintained in the future. These areas are detailed on the Land Plans (APP-008) and referred to in the Statement of Reasons (APP-022).	

Theme	Summary of RR
	<p>OLBS paragraph 1.4.5.1 (APP-506) refers to the maintenance of existing hedgerows / hedgerow trees within the Order Limits. This includes restrictions associated with the removal of hedgerows / trees, introduction of new hedgerows / hedgerow trees, gapping up of existing hedgerows and new hedgerow planting to replace hedgerows grubbed out within the Order Limits. The approval, implementation and maintenance of a landscaping scheme, which is to be in accordance with the OLBS, is secured via dDCO (APP-019) Requirements 7 (provision of landscaping) and 8 (Implementation and maintenance of landscaping).</p>
<p>Construction Methodology</p>	<p>The Council do not consider that enough detail was provided relating to the methodology and impacts associated with laying the two cable circuits in the Hambledon Road.</p>
<p>Applicant's Response</p>	
<p>The impacts of the traffic management required to facilitate construction of the Onshore Cable Route has been assessed in the Transport Assessment (APP-448) and Chapter 22 (APP-137) of the ES using a reasonable worst-case analysis that includes shuttle working traffic signals on the B2150 Hambledon Road. The methodology and scope of traffic impact analysis with Hampshire County Council, as the Highway Authority, and has used the Sub-Regional Transport Model to consider the direct impacts along the Onshore Cable Corridor and indirect impacts associated with reassignment of traffic onto alternative routes to avoid the works.</p> <p>The proposed protective provisions for the protection of highways and traffic included within the dDCO (APP-019) requires Traffic Management Strategies to be approved, by the relevant highway authority, in accordance with the Framework Traffic Management Strategy (FTMS) (APP-449).</p>	
<p>Transport</p>	<p>The Council raise concerns over the assessment of unforeseen delays to the roadworks and the possible impacts of this on the local community. In the event more extensive impacts are identified, the Council considered that mitigation is required.</p>
<p>Applicant's Response</p>	
<p>The Applicant has engaged with WCC on the effects of the Proposed Development since February 2017 and will continue to engage during the course of the Examination, with a view to resolving all outstanding matters.</p> <p>The impacts of the traffic management required to facilitate construction of the Onshore Cable Route has been assessed in the Transport Assessment (APP-448) and Chapter 22 (APP-137) of the ES using a reasonable worst-case analysis that includes shuttle working traffic signals on the B2150 Hambledon Road. The methodology and scope of traffic impact analysis with Hampshire County Council as highway authority and has used the Sub-Regional Transport Model to consider the direct impacts along the Onshore Cable Corridor and indirect impacts associated with reassignment of traffic onto alternative routes to avoid the works.</p> <p>The duration of impacts is determined by the installation rate of the Onshore Cable Route based upon professional experience of similar projects. All assessments of impacts are based upon a worst-case installation rate assumptions, further detail in relation to which is provided within the ES Addendum (doc ref 7.8.1). The duration of impact has also been fully considered when determining the magnitude of impact at each location stated within the Chapter 22 and therefore increases in the duration of construction are unlikely to alter the significance of effect already determined.</p> <p>The strategy to mitigate the traffic impacts resulting from installation of the Onshore Cable Route is detailed within the FTMS for all locations (APP-449) and due to the nature of the works this strategy will not change in the unlikely event of increases in the duration of construction. The FTMS also sets out a programme for when all construction works may take place, including where construction in adjacent or nearby locations is prohibited. This will therefore ensure that delays to construction in one location will not result in a cumulative traffic impact beyond that already assessed.</p>	

Theme	Summary of RR
	<p>The Applicant has identified a variety of appropriate mitigation measures to ensure residents and businesses are not unduly affected, as set out in the submitted ES Appendix 22.1A (Framework Traffic Management Strategy) (APP-449) and Appendix 22.2 (Framework Construction Traffic Management Plan) (APP-450) which are secured via Requirements 17 (Construction traffic management plan), 18 (Construction hours) and the proposed protective provisions for the protection of highways and traffic included within the dDCO (APP-019).</p>
Carbon / Climate Change	<p>The Council questions the carbon emissions mitigation proposed during the construction phase and consider that a 'residual amount still remains from the anticipated emissions which are not mitigated in any way'.</p>
Applicant's Response	
<p>As reported in ES Chapter 28 (Carbon and Climate Change) (APP-143), there is no anticipated net increase in carbon emissions due to the Proposed Development with the ES concluding that there will be a net reduction.</p> <p>Mitigation measures related to construction carbon (including embodied emissions (A1-3)) include - as detailed in the Onshore OCEMP (APP-505) Section 5.14.2:</p> <ul style="list-style-type: none"> • Minimise energy consumption including fuel usage by, for example, reducing the requirement for earth movements to/from and within the construction site; • Maximise the local sourcing of materials and local waste management facilities, where practicable; • Use efficient construction processes, such as design for manufacture and assembly; and • As far as practicable, incorporating material resource efficiency and waste minimisation best practice into design, in particular improving the cut/fill balance of the Proposed Development. <p>The OCEMP also requires that the detailed design continues to be optimised to reflect the carbon reduction hierarchy and the requirement for construction materials is reduced, with construction elements substituted for low-carbon alternatives, where practicable. It is recommended that the specification of materials and products with reduced greenhouse gas emissions is considered and that the sustainability credentials of material suppliers and construction contractors, is considered, where practicable.</p> <p>This is outlined in the Onshore OCEMP in Section 5.14.2.1 where it states that the Converter Station design will adopt a sustainable approach which will involve the following measures:</p> <ul style="list-style-type: none"> • Reducing, where practicable, material use in construction and minimising the use of high carbon materials. • Buildings should be energy and resource efficient. <p>The above measures are also captured in Sustainability Design Principle 2 in section 6.2.4 of the DAS. Requirement 6 of the draft DCO requires that the design details to be submitted to the relevant local planning authority for approval in advance of construction of any phase of Works No. 2 (excluding Works No. 2(a)) must confirm how the details submitted conform with the Design Principles in section 6 of the DAS.</p> <p>Following mitigation, likely construction emissions were assessed as minor, significant, adverse (see 28.6.2.9 of ES Chapter 28). The mitigation opportunities above will reduce, but will not prevent, greenhouse gas emissions from occurring during the construction phase. A construction project of this scale will inevitably lead to greenhouse gas emissions of a scale which would lead to an adverse effect of at least minor significance.</p>	
Socio-economic	<p>The Council consider that the benefits to the local economy from expenditure and overnight stays are unrealistic.</p> <p>Also, the Council question the commitment to an Employment and Skills Plan and the legacy benefits to the wider community.</p>
Applicant's Response	
<p>Calculations for employment generation and benefits presented in Chapter 25 (Socio-economics) of the ES ((APP-140), Tables 25.11- 25.13 are considered to be realistic and were based on a conservative assessment as it was recognised that despite the scale of the Project, the nature of the construction work would largely require small specialist crews, likely to be sourced from</p>	

Theme	Summary of RR
	<p>outside the area. Using the Homes and Communities Agency Additionality Guide (2014), a multiplier of 1.5 was used for additional regional benefits above the relatively conservative number of jobs created. This approach is set out in the methodology in Section 25.4.3 of Chapter 25 (Socio-economics).</p> <p>An Employment and Skills Plan was considered but it was felt that due to the specialist nature of the majority of the work, it would be difficult to apply to the project. However, measures would be put in place, where possible, to maximise the potential for the workforce and Proposed Development's supply chain to be sourced locally (paragraph 5.12.1.1 of the OOCEMP (APP-505) and Section 25.9.2 of Chapter 25 (Socio-economics)). The OOCEMP is secured under Requirement 15 of the dDCO (APP-019).</p>
FOC	It is not clear what percentage of spare telecoms capacity is being considered for commercial use and if this is truly associated development.
Applicant's Response	
Further information regarding the proposed use of the spare fibres within the fibre optic cable required to be provided as part of the Proposed Development is provided within the Statement in relation to development associated with AQUIND Interconnector doc ref 7.7.1).	
DCO Requirement	Structure and nature of the Requirements needs reviewing.
Applicant's Response	
<p>The Council's comment is noted. Schedule 2 of the draft DCO (APP-019) sets out the requirements which apply to the carrying out of and operation of the Proposed Development. The Applicant considers the structure and nature of the Requirements to be appropriate. The approach developed in relation to the requirements takes into account the nature of the works comprised within the Proposed Development and reflects the Applicant's expectations for the control documents that will be adhered to and prepared.</p> <p>The Applicant is currently engaging with Winchester City Council in relation to the Application for the purpose of producing a Statement of Common Ground, and one of the matters being discussed is the form and content of the DCO Requirements.</p>	

3. PARISH COUNCILS

3.1. HAMBLEDON PARISH COUNCIL (RR-004)

Table 3.1 – Hambledon Parish Council

Theme	Summary of RR
Transport	Hambledon PC raise issues related to potential transport impacts during the construction stage
Applicant's Response	
The transport impact of the proposals in Denmead has been assessed and is included in Appendix 22.1 (Transport Assessment) of the ES (APP-448), with the traffic management to be implemented in the vicinity of Denmead set out in Section 5 of Appendix 22.1A (Framework Traffic Management Strategy) of the ES (APP-449).	
Landscape	Visual impact of the Converter Station.
Applicant's Response	
The Applicant's assessment concludes that the Converter Station will not be visible from Hambledon. Chapter 15 (Landscape and Visual Amenity) of the ES (APP-130) identifies that "the settlements of Hambledon and Clanfield that lie within the 8 km study area are not within the zone of theoretical visibility (ZTV) and were scoped out of the LVIA on the basis that these settlements would not experience potential views of the Proposed Development" (paragraph 15.5.3.76). This is supported by Figure 15.46, Recreational and Transport Routes Converter Station (3 km), (APP-279) which includes the ZTV and shows that the extent of theoretical visibility only extends to high ground surrounding the edge of Hambledon not to the village itself (properties off West and East Street).	

3.2. THE PARISH COUNCIL OF NEULANDS (RR-023)

Table 3.2 – The Parish Council of Newlands

Theme	Summary of RR
Alternative	The Parish Council question whether a less disruptive cable route is available.
Applicant's Response	
An explanation of the reasonable alternatives considered, and the selection of the Onshore Cable Corridor is provided in Chapter 2 to the ES (APP-117) and the Supplementary Alternatives Chapter submitted as part of the Environmental Statement Addendum [<i>doc ref 7.8.1</i>].	
Transport	The Parish Council raise concerns regarding the disruption to traffic and residents during the installation of cables.

Theme	Summary of RR
Applicant's Response	
<p>An assessment of the traffic and transport impacts of the proposals has been undertaken and is included in Chapter 22 (Traffic and Transport) of the ES (APP-137) and ES Appendix 22.1 (Transport Assessment) of the ES (APP-448). The proposed measures intended to offset the identified impacts are further detailed in both Appendix 22.1A (FTMS) of the ES (APP-449) and Appendix 22.2 (Framework CTMP) of the ES (APP-450).</p> <p>The methodology for installation of the Onshore Cable Route has been designed to ensure disruption will be kept to a minimum and the required mitigation measures are secured by Requirements included within the dDCO, in particular Requirement 15 (Construction environmental management plan), Requirement 17 (Construction traffic management plan), and the proposed protective provisions for the protection of highways and traffic.</p>	
Cable Heat	The Parish Council question the possible heat emissions from the cables and the potential effect on the environment and clay soils.
Applicant's Response	
<p>HVDC cables generate heat during operation which is caused by energy losses in the underground cables because they are typically not 100% efficient as identified in ES Chapter 3 Description of the Proposed Development (APP-118), and the Additional Supporting Information for Onshore Works (APP-359), and Onshore Electric and Magnetic Field Report (APP-361). All electrical cables generate heat; however, the Proposed Development has HVDC cables, which generate less losses than traditional AC cables that carry significantly lighter loads – some of which are already installed in the vicinity of the proposed Order Limits.</p> <p>The Applicant's technical advisors note that traditional AC cables have two types of losses that generate heat: Dielectric losses and sheath losses. The dielectric losses are naturally created by the insulating material and the sheath losses are created by induced voltage and currents in the cable's metallic screen. HVDC cables do not have either of these losses and therefore generate significantly less heat than traditional AC cables of a smaller size, making them ideal for underground cables for interconnector projects.</p> <p>In addition, the HVDC cables have been extensively modelled for different seasonal and environmental conditions, a typical calculated increase in temperature at ground level is in the order of 2-3°C therefore having negligible effect on the environment. As for clay or other ground drying out, the installation is designed specifically to prevent this from occurring as dried-out ground presents a significantly greater thermal resistance which makes the system less efficient and increases losses. Accordingly, cables are installed in ducts (plastic pipes) that offer good thermal properties at higher temperatures. The cross-section of the ducts is designed such that the temperature outside of the surrounding material does not dry out surrounding clay or other ground.</p>	

3.3. HORNDEAN PARISH COUNCIL (RR-035)

Table 3.3 – Horndean Parish Council

Theme	Summary of RR
Transport	The Parish Council request that an effective traffic management plan be produced and then managed to minimise the disruption to traffic in Horndean.
Applicant's Response	
<p>The traffic management proposals are set out in ES Appendix 22.1A (FTMS) (APP-449). The Applicant is in ongoing discussions with HCC as the relevant Highway Authority for Horndean. A full assessment of the likely impacts of the proposed scheme in respect to traffic and transport is included in Appendix 22.1 (Transport Assessment) of the ES (APP-448) and the Supplementary Transport Assessment (Doc Ref 7.8.1.11), which concluded there will not be significant adverse impacts on highways in Horndean.</p>	

3.4. DENMEAD PARISH COUNCIL (RR-052)

Table 3.4 – Denmead Parish Council

Theme	Summary of RR
Carbon/Climate Change	Question if evidence is provided that the energy supply is 'green'.
Applicant's Response	
<p>The Proposed Development does not generate electricity. The energy supplied via the Proposed Development to the UK would be sourced from the French energy network and is considered to be low carbon (see 28.6.2.6. of the in ES Chapter 28 (Carbon and Climate Change) (APP-143).</p> <p>For reference, in 2017 (the most recent data) the UK residual grid carbon intensity was 367 gCO₂/kWh whereas the French residual grid carbon intensity was 57 gCO₂/kWh. Therefore, on average, the Proposed Development will import lower carbon electricity to the UK network than the average of that domestically generated.</p>	
FOC	Concerns regarding the use of the fibre optic cable for commercial purposes
Applicant's Response	
<p>Further information regarding the proposed use of the spare fibres within the fibre optic cable required to be provided as part of the Proposed Development is provided within the Statement in relation to development associated with AQUIND Interconnector (doc ref 7.7.1).</p>	
Ecology (BNG)	Concerns regarding the delivery of a net biodiversity gain and enhancements to local culture and character.
Applicant's Response	
<p>Further information on the approach taken to support biodiversity are set out in the Biodiversity Position Paper (doc ref: 7.7.9) and the accompanying Biodiversity 2.0 metric (appendix 2). It should be noted that the approach taken for biodiversity follows Natural England's biodiversity net gain technical guidance (http://publications.naturalengland.org.uk/publication/5850908674228224) the CIEEM Biodiversity Net Gain good practice guidance (https://cieem.net/i-am/current-projects/biodiversity-net-gain/). The metric used to assess biodiversity is the Biodiversity Metric 2.0, published by Natural England in December 2019.</p> <p>The Applicant has outlined their approach to net gain (biodiversity) and enhancements in the updated Outline Landscape and Biodiversity Strategy (APP-506 Rev002) which outlines opportunities to maximise biodiversity. As identified in the indicative landscape mitigation plans – Figure 15.48 (APP-281), Figure 15.49 (APP-282) and Figure 15.50 (APP-283).</p>	
Alternatives	The Parish Council raise concerns over the proposed Converter Station location in the countryside (creating a 'brownfield site' adjacent to the National Park) as other interconnectors are sited in industrial locations.
Applicant's Response	
<p>The Applicant has explained the reasonable alternatives considered for the grid connection point and the reasons for the selection of the location of the converter station in proximity to Lovedean Substation, including considerations relevant to potential impacts on the SDNP, within the Chapter 2 (Consideration of Alternatives) of the ES (APP-117) and the Supplementary Alternatives Chapter submitted as part of the Environmental Statement Addendum (doc ref 7.8.1). This provides an overview of the process undertaken to identify the preferred grid connection point and location for the Converter Station forming part of the Proposed Development. In summary, whilst the proposed location of the Converter Station is in the countryside, it is considered by the Applicant to be the most suitable and appropriate location.</p> <p>The impact of the Converter Station on the setting on the SDNP is identified in ES Chapter 15 Landscape and Visual Amenity (APP-130). In terms of landscape and visual amenity, the proposed location was considered to be the most suitable location, able to utilise the existing topography and surrounding hedgerows, hedgerow trees and woodland to provide visual</p>	

Theme	Summary of RR
	<p>screening, accepting that some immediate visual receptors would be affected. Two options for the micro-siting of the Converter Station are provided for within the Application and the dDCO, Option B(i) and Option B(ii). The latter would minimise the loss of vegetation and better relate to the existing Lovedean Substation, with the utilisation of this area being subject to ongoing discussions with National Grid who own this land.</p>
Socio-economic / Needs & Benefits	<p>The Parish Council consider that local employment or training opportunities are not adequately provided. Also, there is considered to be a potential for loss of passing trade at shops in Denmead and the Parish Council question the level of benefits and compensation for the local community.</p>
Applicant's Response	
<p>Section 25.9.2.1 of Chapter 25 (Socio-economics) of the ES (APP- 140) sets out measures, where possible, to maximise the potential for the workforce and supply chain to be sourced locally. These measures include working with local people and businesses, engaging with the Jobcentre Plus, and upskilling through experience and training and are included in section 5.12.1 and 5.12.2 of the OOCEMP (APP 505) and secured as part of Requirement 15 of the dDCO.</p> <p>In assessing the potential impacts on local businesses, the Chapter identifies measures will be put in place to reduce disruption during the construction period. These measures are outlined in the OOCEMP. Onshore Cable Route Construction Impacts on Access to Properties and Car Parking and Communication Strategy included as Appendix 1 of the FTMS (APP-449) identified individual business and also includes details of alternative car parking and will be secured as part of the FTMS.</p> <p>Any requirements for compensation for loss of business would be subject to the relevant legal and compensatory regimes in this regard.</p> <p>A summary of the likely benefits of the Proposed Development, including benefits to the local community, is set out at Section 7.2 of the Planning Statement and in greater detail within the Needs and Benefits Report (APP-115) and the Addendum (document reference 7.7.7).</p> <p>With regard to the request for a community benefits/compensation fund, the Applicant considers the mitigation proposed in connection with the Proposed Development is adequate to minimise the adverse impacts associated with it. The Applicant will continue to engage with the relevant authorities regarding the potential and justification for any planning obligations in connection with the Proposed Development.</p>	
Consultation	<p>The Parish Council consider that there has been a lack of consultation, 'with only one consultation session held for public and this was not publicised to people of Denmead'</p>
Applicant's Response	
<p>The Applicant considers that adequate consultation has taken place.</p> <p>The Consultation Report (APP-025) confirms compliance with the SoCC which was accepted by PINS as compliant as reflected in the s55 Checklist (PD-002).</p> <p>The Consultation Report confirms that three meetings were held with Denmead Parish Council on 03 January 2018, 06 March 2019 and 19 August 2019. The meeting on 03 January 2018 was open to all members of the public. In addition, various responses to written questions posed by the Parish Council were responded to by the Applicant.</p> <p>The Applicant confirms that there has been ongoing engagement with Denmead Parish Council post submission of the Application.</p> <p>As agreed in the SoCC, residents within 500 m of the Order Limits at the Converter Station and Landfall, and 100 m of the Onshore Cable Route were consulted as part of the non-statutory consultation with the nearest Public Exhibition held on 27 January 2018 at Lovedean Village Hall, illustrated in the Map of Distribution Area for Statutory Consultation, Appendix 1.11 (APP-034). The statutory consultation was also completed on the same basis during 2019. Site notices were erected within and in the vicinity of Denmead as shown in Appendix 1.5G (APP-094), in addition to the press notices as shown in Appendix 5.1.4T (APP-081) and Appendix 5.1.4U (APP-082)</p> <p>The Applicant also notes the comments contained in PINS letter of 11 May 2020 confirming that matters relating to pre-application consultation precede and therefore lie outside the remit of the Examination process.</p> <p>The Applicant confirms that there has been ongoing engagement with Denmead Parish Council post submission of the Application.</p>	

Theme	Summary of RR
CEMP/TMP	The Parish Council raise safety concerns regarding children who walk or cycle to school along Hambledon Road.
Applicant's Response	
Section 2.9 of the FTMS (APP-449) confirms that pedestrian and cycle routes along the Onshore Cable Corridor will be maintained wherever possible, with full closure considered as the last resort, such as where it would prevent full closure of a major road. In all cases the construction works will ensure that pedestrians and cyclists can pass in a safe manner, with suitable barriers between the construction works. Particular attention will also be paid to the needs of people with mobility and visual impairments to ensure that their safety and free movement is retained. All layouts will follow protocol defined by Chapter 8 of the Traffic Signs Manual (DfT, 2009)'.	
Landscape	The Parish Council raised concerns regarding the visual impact of on-site waste storage and fencing at the Converter Station Area, and in respect of the long-term security of the proposed landscape mitigation and the site restoration following the decommissioning. Concerns were also raised regarding removal of ancient trees/hedgerow would result from the proposed Converter Station options.
Applicant's Response	
The Applicant confirms that there is no permanent waste storage at the Converter Station, but note that the Indicative Converter Station Area Layout Plans (APP-013) show an area allocated for stockpiling and segregation of excavated material to the south west of the Converter Station within an existing arable field and east of Old Mill Lane for construction stage works which will be re-instated to its original condition/level at the end of construction stage.	
Paragraph 5.2 of the OOCEMP (APP-505) requires that “measures may be considered during construction works to ensure protection of the existing landscape setting and views to the construction site”. The need to reduce visual clutter and introduce temporary screening for sensitive visual receptors is reiterated for the Converter Station under Section 6.2.3.	
Draft DCO (APP-019) Requirement 6(1)(d) relates to the approval of external appearance and materials, and the design principles cover the proposed fencing design, Design Principle of the Design and Access Statement (APP114). Proposals will need to be submitted and approved by the relevant planning authority in consultation with the SDNPA.	
Acquisition of rights over existing landscaping features is sought to ensure the existing landscaping which is to serve a screening function can be adequately enhanced and maintained in the future. These areas are detailed on the Land Plans (APP-008) and referred to in the Statement of Reasons (APP-022).	
OLBS paragraph 1.4.5.1 (APP-506) refers to the maintenance of existing hedgerows / hedgerow trees within the Order Limits. This includes restrictions associated with the removal of hedgerows / trees, introduction of new hedgerows / hedgerow trees, gapping up of existing hedgerows and new hedgerow planting to replace hedgerows grubbed out within the Order Limits. The approval, implementation and maintenance of a landscaping scheme, which is to be in accordance with the OLBS, is secured via dDCO (APP-019) Requirements 7 (provision of landscaping) and 8 (Implementation and maintenance of landscaping).	
No ancient and veteran trees have been identified in the Study Area nor are any to be removed in connection with the Proposed Development, confirmed in the Arboriculture Report (Appendix 16.3 of the ES (APP-411)) paragraph 1.8.1.1.	
Converter Station Option B(i) would result in the loss of vegetation to the western and northern edge of the Converter Station. In terms of hedgerows, those potentially lost are species rich and identified as “Important Hedgerows” under the Hedgerow Regulations (Hedgerow and Tree Preservation Order Plans – APP-018).	
Consent for decommissioning is not sought as part of the Application and will be dealt with in the future, with the appropriate consents obtained as required.	
Ecology	The Parish Council consider that ecological mitigation is insufficient (specific comment on wide ranging powers, specifically impact on TPO trees and ancient hedgerows) and that the cumulative impact would have significant and detrimental impacts on Denmead's ecology.
Applicant's Response	
The Applicant's position with regard to the proposed biodiversity enhancements is explained in the submitted Biodiversity Position Paper (<i>Doc Ref 7.7.9</i>)	

Theme	Summary of RR
	<p>Impacts on biodiversity features from the Proposed Development are presented in ES Chapter 16 (Onshore Ecology) (APP-131). Where potential effects on biodiversity features have been identified, avoidance and mitigation measures have been proposed to address them. The Proposed Development has also committed to habitat creation through the OLBS (APP-506) which will be implemented as part of construction of the Proposed Development.</p> <p>Specifically, the Onshore Cable Corridor has been routed along roads where possible to avoid effects on habitats. Horizontal Directional Drilling will be used to cross beneath lowland meadow habitat at Denmead Meadows, a site of high importance for nature conservation in the parish. Where construction compounds are located within the meadows to permit this, restoration work will be undertaken to maintain lowland meadow habitat there.</p> <p>Articles 41 and 42 of the dDCO provide powers in relation to the removal of trees and hedgerows. An explanation of those powers is provided at paragraphs 11.4 – 11.5 of the Explanatory Memorandum (APP-020). The mitigation measures secured in section 5.3.4 Arboriculture and sections 6.3 to 6.11 of the OOCEMP (APP-505) require the Proposed Development to avoid high and medium value features where practical. Consequently, the design will seek to avoid positioning cables in conflict with the Root Protection Areas (RPAs). Those powers when exercised subject to the mitigations provided for in the OOCEMP are considered entirely appropriate and are necessary to ensure the Proposed Development can be delivered.</p>
Transport	<p>The Parish Council suggest the “advised 60 second delay along Hambledon Road is incorrect”, with no traffic survey completed. Also, Hambledon Road is identified as the police ‘preferred alternative route’ for M27 traffic diversions and a key access to the Household Waste Recycling Centre. Finally, a concern is raised that the proposed inspection pits locations are not identified.</p>
Applicant’s Response	
<p>The Transport Assessment (APP-448) submitted as part of the Application uses a combination of the Sub-Regional Transport Model (SRTM) and localised junction capacity assessments to assess the cumulative temporary impacts relating to construction of the Onshore Cable Route. The SRTM scenario used for the TA included six traffic locations along the Onshore Cable Route to reflect the maximum number of construction gangs which may be in place on the highway during the construction programme, as agreed with Hampshire County Council and Portsmouth City Council as relevant highway authorities during pre-application discussions. The 60 second delay forecast on Hambledon Road within the TA reflects the cumulative impact of traffic redistribution away from the Onshore Cable Corridor and assessed traffic management locations included within the SRTM, resulting in a reduction in traffic on this route in comparison with baseline conditions. The Applicant considers this representative of driver behaviour given the nature of the works, which, whilst temporary, will be in place for a number of weeks, allowing drivers to seek alternative routes.</p> <p>The Applicant acknowledges the concerns in relation to the preferred alternative route to the M27. In relation to events such as temporary road closures resulting from an accident, the Applicant is currently in discussions with HCC Highways regarding the incorporation of protective provisions within the DCO which allows construction work on the Onshore Cable Route and associated traffic management to be suspended to alleviate the impacts of such unforeseen circumstances on the local highway network.</p> <p>In respect of the proposed inspection pits, the Applicant assumes these to be the proposed Joint Bays. Paragraph 1.3.10.9 of ES Appendix 22.1 (Transport Assessment), confirms that the number and definitive locations of the Joint Bays are dependent upon detailed design which cannot be confirmed at this stage. However, it should be noted that in all cases the Joint Bay locations will fall within the Order Limits and located off-carriageway where practicable. The draft DCO (APP-019) confirms in Schedule 1, Work No. 4 – works to lay the onshore HVDC cables, that there will be a maximum of 25 joint bays per cable circuit along the full onshore route.</p>	
Cable heating	<p>The Parish Council raise concern regarding heat generation from cables, and potential clay shrinkage resulting in long term damage to the roads and land under which they are laid.</p>
Applicant’s Response	
<p>HVDC cables generate heat during operation and it is caused by energy losses in the underground cables because they are typically not 100% efficient as identified in ES Chapter 3 Description of the Proposed Development (APP-118), and the Additional Supporting Information for Onshore Works (APP-359), and Onshore Electric and Magnetic Field Report (APP-361). All electrical cables generate heat; however, the Proposed Development has HVDC cables, which generate less losses than traditional AC cables that carry significantly lighter loads – some of which are already installed in the vicinity of the proposed Order Limits.</p>	

Theme	Summary of RR
	<p>The Applicant's technical advisors note that traditional AC cables have two types of losses that generate heat: Dielectric losses and sheath losses. The dielectric losses are naturally created by the insulating material and the sheath losses are created by induced voltage and currents in the cable's metallic screen. HVDC cables do not have either of these losses and therefore generate significantly less heat than traditional AC cables of a smaller size, making them ideal for underground cables for interconnector projects.</p> <p>In addition, the HVDC cables have been extensively modelled for different seasonal and environmental conditions, a typical calculated increase in temperature at ground level is in the order of 2-3°C therefore having negligible effect on the environment. As for clay or other ground drying out, the installation is designed specifically to prevent this from occurring as dried-out ground presents a significantly greater thermal resistance which makes the system less efficient and increases losses. Accordingly, cables are installed in ducts (plastic pipes) that offer good thermal properties at higher temperatures. The cross-section of the ducts is designed such that the temperature outside of the surrounding material does not dry out surrounding clay or other ground.</p>

4. STATUTORY CONSULTEES

4.1. CORPORATION OF TRINITY HOUSE (RR-003)

Table 4.1 – Corporation of Trinity House

Theme	Summary of RR
Navigation	Trinity House wishes to be a registered interested party due to the impact the development would have on navigation within Trinity House's area of jurisdiction and further comments may be submitted at the relevant stage of the Examination.
Applicant's Response	
Noted. Trinity House has provided further feedback to the Applicant requesting amendments to the DCO/DML which are being reviewed by the Applicant. Further communications via email have also confirmed that a SoCG is not required between the Applicant and Trinity House.	

4.2. PORTSMOUTH WATER LTD (RR-005)

Table 4.2 – Portsmouth Water Ltd

Theme	Summary of RR
Protection of Water Supply	<p>Portsmouth Water raised comments and recommendations on the Application covering land contamination and groundwater protection to safeguard Portsmouth Water's assets and the public water supply.</p> <p>Comments have been made in relation the following documents:</p> <ul style="list-style-type: none"> • EN020022-000586-6.1.18 ES - Vol 1 - Chapter 18 Ground Conditions; • EN020022-000587-6.1.19 ES - Vol 1 - Chapter 19 Groundwater; • EN020022-000959-6.9 Onshore Outline Construction Environmental Management Plan; and • EN020022-000813-6.3.3.6 ES - Vol 3 - Appendix 3.6 Surface Water Drainage and Aquifer Contamination Mitigation Strategy; <p>It has been noted that there are reports referred to in the Application documents that are not present on the Portal at the time of writing, these include:</p> <ul style="list-style-type: none"> • All the WSP Ltd/Geotechnics Ltd Ground Investigation Reports; and • The Piling Works Risk Assessment.
Applicant's Response	
The SoCG has been issued to Portsmouth Water to cover the points raised in relation to Groundwater, Ground Conditions, Geotechnical and Engineering. Discussion are ongoing with regard to further work that is required to resolve the remaining matters highlighted in the SoCG.	

4.3. ASSOCIATED BRITISH PORTS - PORT OF SOUTHAMPTON (RR-011)

Table 4.3 – Associated British Ports – Port of Southampton

Theme	Summary of RR
DCO	Associated British Ports are the statutory harbour authority for the Port of Southampton and does not wish to submit a representation in relation to this application.
Applicant's Response	
The response is noted.	

4.4. ADDLESHAW GODDARD LLP ON BEHALF OF SOUTHERN GAS NETWORKS (RR-012)

Table 4.4 – Addleshaw Goddard LLP on Behalf of Southern Gas Networks

Theme	Summary of RR
DCO	SGN request appropriate protective provisions to be included within the DCO to protect its statutory undertaking and to ensure that public safety is not compromised. Pending agreement with the Applicant, SGN objects to the application and reserves its right to make further representations during the examination process.
Applicant's Response	
<p>The Applicant notes the position of SGN and welcomes future engagement on these issues.</p> <p>The Applicant is currently engaged with Southern Gas Networks regarding the appropriate protective provisions and hopes to establish an agreed approach through the Statement of Common Ground, to be submitted at the relevant deadlines.</p>	

4.5. JOINT NATURE CONSERVATION COMMITTEE (RR-026)

Table 4.5 – Joint Nature Conservation Committee

Theme	Summary of RR
JNCC position	<p>JNCC confirm their satisfaction that potential impacts on the following components (within JNCC's remit) have been adequately characterised and assessed:</p> <ul style="list-style-type: none"> Chapter 6- Physical Processes; Chapter 7- Marine Water and Sediment Quality; Chapter 8- Intertidal and Benthic Ecology; Chapter 10- Marine Mammals and Basking Sharks; Chapter 11- Marine Ornithology; Chapter 29- Cumulative Impacts; <p>and all associated appendices and figures.</p>

Theme	Summary of RR
	<p>In addition, JNCC are satisfied that there is no significant risk of the project hindering the conservation objectives of the following Marine Conservation Zones (MCZs):</p> <p>Offshore Overfalls MCZ;</p> <p>Offshore Brighton MCZ.</p> <p>JNCC's advice is that there are no major or minor matters outstanding and all matters within JNCC's remit have been resolved satisfactorily as part of the pre-application process and/or within the Environmental Statement.</p>
Applicant's Response	
<p>JNCC's comments are welcomed and confirmed in teleconference held on 26 March 2020 with JNCC and Natural England. These matters are reflected in the Statement of Common Ground (SoCG) (document reference 7.5.12) submitted at Deadline 1.</p>	
Application documents	<p>JNCC suggest that it would be useful for future figures to include the territorial boundary to allow easy assessment of whether operations are within or outwith territorial waters.</p> <p>Also, JNCC note that just because the impact of other projects may only cause temporary and/or localised disturbance independently, it does not rule out cumulative impacts of these projects in-combination to bird species. Particularly for bird species that are sensitive to anthropogenic disturbance and loss of foraging habitat. The cumulative/ in-combination impact should be discussed in this context.</p>
Applicant's Response	
<p>Further to a teleconference held on the 26 March 2020 with JNCC, the Applicant confirmed that should figures be prepared or updated during the examination period, this boundary will be included. During the teleconference, JNCC also confirmed that they would like confirmation that projects identified for assessment were assessed cumulatively (i.e. all projects occurring all at the same time), and not just in a pair-wise manner. JNCC also noted that their comments did not constitute an objection to the Proposed Development but should be treated as a comment to clarify.</p> <p>The Applicant confirmed via email (2 April 2020) that the cumulative assessment did consider all relevant projects together, rather than in a pair-wise fashion. JNCC has subsequently responded that they are satisfied that their comments have been fully addressed and have no further comments to make on the Application. This is documented in the SoCG (document reference 7.5.12) submitted at Deadline 1.</p>	

4.6. THE CROWN ESTATE (RR-037)

Table 4.6 - The Crown Estate

Theme	Summary of RR
DCO	<p>Aquind Limited holds an Option Agreement from The Crown Estate for the area of seabed to be occupied by the project that lies within English territorial waters (i.e. within 12 nautical miles), and (subject to obtaining the necessary development consents) The Crown Estate will issue a lease to Aquind Limited for construction of the project.</p>
Applicant's Response	
<p>The Crown Estate's Relevant Representations are noted. The option is in place.</p>	

4.7. PUBLIC HEALTH ENGLAND (RR-065)

Table 4.7 – Public Health England

Theme	Summary of RR
General Public Health (Ground Conditions, Air Quality, EMF)	<p>Public Health England are satisfied with the ES methodology specifically ground conditions, modelled air emissions from the backup diesel generators, the potential impacts of the static and alternating electric and magnetic fields associated with the onshore electricity infrastructure, and the mitigation measures set out in the Outline CEMP.</p> <p>On this basis, Public Health England do not wish to register an interest.</p>
Applicant's Response	
<p>The Applicant welcomes Public Health England's representation and satisfaction of the ES methodology, and the proposed control and mitigations measures identified within the Application.</p>	

4.8. HIGHWAYS ENGLAND (RR-096)

Table 4.8 - Highways England

Theme	Summary of RR
Transport	<p>Highways England's main concerns relate to the A27 Trunk Road, which forms part of the strategic road network (SRN) and wish to ensure that the Proposed Development will not have a severe and detrimental impact on the SRN. Object, but acknowledge discussions are ongoing in conjunction with the local highway authorities, regarding traffic impacts, mitigation and protective provisions</p> <p>Specifically advise on the need for formal agreement to drill beneath the A27, whilst acknowledging that due to the depth of the drill the risk to the A27 is low.</p> <p>Advise the book of reference identifies a number of parcels as registered to Highways England which they consider to be incorrect and should be registered to Hampshire County Council (with the exception of parcel number 7-22). Highways England will continue to liaise with a view to reaching agreement before the end of the Examination and a Statement of Common Ground (SoCG) is expected to be submitted.</p>
Applicant's Response	
<p>The Applicant welcomes the intent of Highways England to agree upon all outstanding matters prior to the end of the Examination and is committed to active engagement with Highways England to achieve this outcome and address these within the SoCG, to be submitted at the relevant deadlines.</p> <p>With regard to the impact of construction and operation on the SRN, it should be noted that no roads which fall under the jurisdiction of the Secretary of State as a Highway Authority and Highways England as the Strategic Highways Company acting on their behalf are directly included in the Onshore Cable Corridor. However, as noted in paragraph 1.1.1.8. of Appendix 22.1 (Transport Assessment) of the ES (APP-448), parts of the SRN do form sections of potential diversionary routes for traffic. Taking this into account, the Applicant will continue to engage with Highways England during the course of the Examination.</p> <p>There is ongoing additional engagement with regards to Highways England's Technical Notes.</p>	

4.9. MARITIME AND COASTGUARD AGENCY (RR-114)

Table 4.9 – Maritime and Coastguard Agency

Theme	Summary of RR
Navigation and Shipping	<p>The Maritime and Coastguard Agency would appreciate the opportunity to assess the impact of the proposed Aquind Interconnector on the safety of navigation and the UK’s search and rescue capabilities. The Agency expect a Navigation Risk Assessment (NRA) to be carried out which demonstrates that the risk to the safety of navigation can be suitably mitigated to their satisfaction, and that the risk remains As Low As Reasonably Practicable (ALARP).</p> <p>The Agency also have an interest in the proposals for the cable burial, and any cable protection required, and the impact of the works which will take place in close proximity to the Dover Strait Traffic Separation Scheme (TSS).</p>
Applicant’s Response	
<p>The Applicant held a teleconference on the 18 March 2020 with the Maritime and Coastguard Agency (MCA). Subject to further discussions and iterative reviews of the SoCG to ensure mitigation is secured through the DML, the MCA has confirmed that they are satisfied that the potential risk to shipping and navigation has been adequately assessed and the possible impacts are acceptable. This information is captured within the SoCG (document reference 7.5.17) submitted at Deadline 1.</p>	

4.10. ENVIRONMENT AGENCY (RR-165)

ONSHORE

Table 4.10 – Environment Agency – Onshore

Theme	Summary of RR
Flexibility (Converter Station)	<p>The Environment Agency is satisfied with the approach to retaining flexibility in the location of the Converter Station.</p>
Applicant’s Response	
<p>The Applicant welcomes that the Environment Agency considers the Applicant’s approach regarding the location of the Converter Station acceptable with regards to the two converter station options submitted – Option B(i) and Option B(ii).</p>	
Groundwater	<p>Advise that the Converter Station site is located within the Bedhampton and Havant Springs Source Protection Zone 1, with known karstic features, which require groundwater and are generally reassured by the general principles set out in the Aquifer Contamination Mitigation Strategy.</p> <p>Request a watching brief for construction whilst supporting the approach to ‘block’ these karstic features.</p> <p>Reassured by the remote monitoring of the Converter Station site but seek clarification on response times, maintenance schedules, a Pollution Incident Plan, whether the transformer can be covered to minimise rainwater collection in underground storage tanks, and details of how fire water will be contained and dealt with.</p>

Theme	Summary of RR
	<p>Request a number of revisions to the Onshore Outline CEMP including reference SPZ1 and regional water supply, and a Piling Works Risk Assessment including Requirement 15 of the draft DCO to include Environment Agency approval of the CEMP.</p> <p>Request sight of the Phase 1 and Phase 2 ground investigation works referred to in ES Chapter 19 (Groundwater).</p> <p>Note dewatering is likely to be required during construction and may require permits for dewatering with the Environment Agency supportive that the permits will be applied for at the relevant time but seek further details regarding the proposed principles of dewatering activities within the CEMP.</p>
<p>Applicant's Response</p>	
<p>The Applicant welcomes the Environment Agency's general support of the blocking of the karst features within the Converter Station Area. The Applicant will be expanding on the principles and detail within the OOCEMP (APP- 505) which will be secured as part of Requirement 15 of the draft DCO (APP-19) and will include the production of a preliminary Karst Assessment Addendum / Appendix containing a Piling Risk Assessment.</p> <p>An Addendum to the Environmental Statement (ES) has been produced which contains additional information specifically relating to the issue of karst dissolution features. The ES Addendum (7.8.1) presents all available data on karst dissolution features in Sections 1, 2 and 3. Several additional predicted impacts were included, along with mitigation measures for these.</p> <p>The mitigation measures include a watching brief during the works at the Converter Station, the onshore cable trenching (in Sections 1,2 and 3) and the HDD works (HDD-5). The watching brief's responsibility will be the detection of karst dissolution features. Several other mitigation measures were also listed are detailed in the Addendum.</p> <p>On 5 August 2020 a workshop meeting with the Environment Agency (EA), Portsmouth Water (PW), Hampshire County Council and Aquind was held, during which the procedure for dealing with unknown karst dissolution features during the works was discussed. The EA and PW agreed with The Applicant's approach as described, but requested that a Generic Method Statement be produced, which clearly sets out the mitigation procedure for dealing with unknown karst dissolution features. This is currently in draft form. A communications plan was also requested.</p> <p>Information on maintenance schedules, the Pollution Incident Plan, whether the transformer can be covered to minimise rainwater collection and details of how fire water will be contained and dealt with is included within the Surface Water Drainage and Aquifer Contamination Mitigation Strategy.</p> <p>Revisions to the Onshore Outline CEMP have been made so that it now includes references to SPZ 1 and regional water supplies and emphasises the protection of these. The Piling Works Assessment is also discussed.</p>	
<p>River Crossings</p>	<p>Acknowledge the requirement to obtain Flood Risk Activity Permits (FRAPs) before commencement but are yet to receive a detailed methodology to advise.</p> <p>Support the principle of HDD of three Main River crossings and principles of utilisation of existing culverts for the other five Main Rivers, noting a detailed methodology is awaited.</p> <p>Recommend that a requirement is included in the DCO to cover the need FRAP to be obtained prior to works being undertaken.</p>
<p>Applicant's Response</p>	
<p>The Applicant acknowledges that any works in, under, over or within 8 metres of the top of the bank of any Main River require a FRAP from the Environment Agency under the Environmental Permitting (England and Wales) Regulations 2016, as identified in the Other Consents and Licences document (APP-106). This will be obtained by the appointed contractor at the relevant stage of the works, however general principles in relation to the surface water resources and flood risk environment as per ES Appendix 20.3 (Watercourses Summary) (APP-308), ES Chapter 20 Surface Water Resources and Flood Risk (APP-135), Appendix 20.2 (Onshore WFDa) (APP-438) have been embedded into the OOCEMP (APP-505). The Applicant and Environment</p>	

Theme	Summary of RR
<p>Agency are in agreement of the general principles to be adopted to ensure there is no impediment to a permit/exemption being provided to enable construction of the Proposed Development as set out in the Applicant's SoCG with the Environment Agency.</p> <p>Regarding the request to include a requirement in the DCO to cover the need for a FRAP to be obtained, the Applicant does not consider this appropriate. As the Applicant is already required by law to obtain additional consents/permits, they will be obliged to do so under the relevant statutory regime and there is no need for this to be repeated in the DCO.</p>	
<p>Flood Defences</p>	<p>Raise potential impacts of the cable installation upon planned coastal flood defences. Acknowledge pre-application engagement with the Eastern Solent Coastal Partnership (ESCP), and there are on-going discussions regarding the potential crossing at Milton Common. This discussion must be satisfactorily concluded prior to any DCO being granted.</p> <p>Need to consider possible overlapping of construction activities. Request written confirmation during the DCO process that the coastal flood defences will not be negatively impacted by the cable during construction and operation.</p>
<p>Applicant's Response</p>	
<p>Detailed consultation has been undertaken with ESCP who have shared plans of their existing and proposed development, and methodologies for areas where the flood defence works and the Proposed Development overlap have been identified and agreed in principle. Specific measures, with regards to the proposed works and operation will form part of the SoCG with PCC (including ESCP) and the Applicant will provide clarity on relevant agreements once available.</p> <p>These in-principle agreements with ESCP will subsequently be used as the general basis for relevant FRAP applications with the Environment Agency with regard to works adjacent to the coastal flood defences. The Applicant and Environment Agency are in agreement of the general principles to be adopted to ensure there is no impediment to a permit/exemption being provided to enable construction of the Proposed Development as set out in the Applicant's SoCG with the Environment Agency.</p>	
<p>Landfall (Construction)</p>	<p>Acknowledge landfall installation using HDD underneath Langstone Harbour and are supportive of this as the preferred method for reducing any impacts on the ecology of Langstone Harbour.</p> <p>A FRAP will need to be obtained prior to the commencement of such works (as per river crossing comment above).</p>
<p>Applicant's Response</p>	
<p>The Applicant welcomes the support of the HDD installation under Langstone Harbour in order to reduce ecological impacts.</p> <p>The Applicant acknowledges that the works will require a FRAP from the Environment Agency under the Environmental Permitting (England and Wales) Regulations 2016 as acknowledged in section 5.7 of the OOCEMP (APP-505) which will be sought by the contractor following detailed design. The requirement for a FRAP is also included within the Other Consents and Licences document (APP-106).</p>	
<p>Flood Risk</p>	<p>Flood risk is not of particular concern across the cable route, but concern regarding activities during the laying of the cables and ancillary works (such as storage of soil, etc), to ensure these activities do not increase flood risk elsewhere. General support of the approach proposed by the Applicant to manage flood risk.</p> <p>The Converter Station site is located in Flood Zone 1, therefore no concern in regard to fluvial or tidal flood risk.</p> <p>Refer to LLFA for surface water flood risk, note there are no critical drainage problems within the Order Limits.</p>

Theme	Summary of RR
Applicant's Response	
<p>The Applicant notes that the EA considers flood risk is not of particular concern across the cable route but that the EA have some concerns regarding activities during the laying of the cables and ancillary works (such as storage of soil, etc), to ensure these activities do not increase flood risk elsewhere. Principles to ensure these activities do not increase flood risk elsewhere are provided within the OOCEMP (APP-505), in Section 5.7, and given that the EA generally supports the approach proposed by the Applicant to manage flood risk, the Applicant considers these principles to be adequate The OOCEMP is secured under Requirement 15 of the dDCO (APP-019).</p>	
Ecology	<p>The cable makes landfall at Eastney and will then be installed using HDD underneath Langstone Harbour. This is the preferred method for reducing any impacts on the ecology of Langstone Harbour, which is highly designated for nature conservation (Chichester and Langstone Harbours SPA (Special Protection Area), Solent Maritime SAC (Special Area of Conservation and Langstone Harbour SSSI (Site of Special Scientific Interest). We are therefore supportive of the HDD method for this location.</p> <p>Previously requested consideration of opportunities for biodiversity net gain/enhancement, considered to be in keeping with EN-1, paragraph 5.3.4. Wish to see details of the opportunities identified, and which opportunities will be carried forward by the Applicant.</p>
Applicant's Response	
<p>The Applicant notes the Environment Agency's support for the preferred method for installation of HDD under Langstone Harbour and has been promoted throughout the design evolution of the Proposed Development in order to minimise impacts on biodiversity including notably, European and nationally designated sites.</p> <p>Impacts on biodiversity features from the Proposed Development are presented in ES Chapter 16 (Onshore Ecology) (APP-131). address The Proposed Development has also committed to habitat creation through the OLBS (APP-506) which will be implemented as part of construction of the Proposed Development. The document summarises proposed mitigation and associated landscape planning proposed within the ES including Chapter 16 (Onshore Ecology).</p> <p>The Applicant's position with regard to the proposed biodiversity enhancements is explained in the submitted Biodiversity Position Paper (<i>Doc Ref 7.7.9</i>)</p>	
DCO	<p>Further comments in relation to the Draft Development Consent Order (Document Ref: 3.1):</p> <ul style="list-style-type: none"> • Article 2(1) – It would be helpful if the definition of “watercourse” distinguishes between ‘Ordinary Watercourses’ (which fall within the remit of Local Authorities) and ‘Main Rivers’ (which fall within the remit of the Environment Agency). • Article 19(1) – Trial holes, trenches, etc can cause risks of turbidity in underlying aquifers in some circumstances. This section may need to acknowledge that in areas where Portsmouth Water abstract for public water supplies, prior approval from them should be sought before any digging (of sufficient depth) occurs. • Schedule 2, paragraph 4 ‘Converter station option confirmation’ – request to be informed of which converter station perimeter option decided upon. This section does not specify who will be informed. • Schedule 2, paragraph 6 – seek to be consulted upon the detailed design for the converter station.

Theme	Summary of RR
	<ul style="list-style-type: none"> Schedule 2, paragraph 13 (5) – should also include reference to consultation with the Environment Agency. Schedule 2, paragraph 18 (2) – in addition to the planning authority, in the event of a pollution incident, the Environment Agency must be informed as soon as possible by contacting the incident hotline.
Applicant's Response	
The Applicant will continue to discuss the draft DCO and Requirements with the Environment Agency and will seek to reach agreement through the SoCG process.	

MARINE

Table 4.11 – Environment Agency – Marine

Theme	Summary of RR
Marine: Effects on diadromous migratory fish	<p>The Environment Agency do not have any outstanding issues of significant concern in relation to:</p> <ul style="list-style-type: none"> The impacts of offshore cable installation techniques on diadromous migratory fish namely Salmon, Sea Trout, Allas and Twaite Shad, Sea and River Lamprey. In particular, the risks posed by increased suspended sediments including impacts on migratory routes, associated reduced oxygen and respiratory effects on these fish. The potential impacts of the Project on European sites designated for nature conservation, as well as the potential risk to Annex II diadromous fish (under the Habitats Directive, as transposed in UK legislation by the Conservation of Habitats and Species Regulations 2010). The potential impacts on freshwater and transitional waterbodies under the Water Framework Directive (WFD). <ul style="list-style-type: none"> Assessment of the impacts on marine water and sediment quality, Shellfish Waters and Bathing Waters.
Applicant's Response	
The Applicant notes the comments which were confirmed in teleconference held with the Environment Agency on 25 March 2020. These matters are reflected in the SoCG (document reference 7.5.15).	
Marine: Coastal Flood Defences	<p>The delivery of the coastal defences is of utmost importance for the community of Portsea Island. Whilst the details of any agreement would be between the Applicant and ESCP, the Environment Agency would expect to see written confirmation during the DCO process that the coastal flood defences will not be negatively impacted by the cable during construction and operation. The Environment Agency understand specifically that there are on-going discussions relating to the cable crossing of the high ground bund for flood risk protection at Milton Common. This discussion must be satisfactorily concluded prior to any DCO being granted.</p>
Applicant's Response	
Further to a teleconference held on 25 March 2020, the Environment Agency have confirmed they are satisfied with how the ESCP coastal project has been assessed within the marine topics and understands that the onshore project team are continuing further consultation with ESCP.	

Theme	Summary of RR
Marine: Eastney Bathing water	<p>The cable route and landfall site at Eastney are within proximity of the Eastney Bathing Water protected area. Any sediment disturbance in proximity to the bathing water during the Bathing Water season (May to September), has the potential to impact on bathing water quality and Water Framework Directive Assessment compliance by elevating suspended sediment concentrations and potential faecal contamination.</p> <p>The Environment Agency would like to see details regarding any proposed works in that area during Bathing Water season and be notified in advance of any works taking place. Ideally, no works which have the potential to disturb sediment during May to September would take place. Further clarification regarding the timing of works is required.</p>
Applicant's Response	
<p>Further to a teleconference held on 25 March 2020, a map illustrating the distances between the closest marine activities of the Proposed Development and the Eastney Bathing Waters sampling location and closest Shellfish Waters was prepared for the Environment Agency and is shown in Appendix 5 of the SoCG (document reference 7.5.15). This map provided assurance that marine works of the Proposed Development will be further than the 500 m distance away as prescribed by the Environment Agency. This information has been shared with and reviewed by the Environment Agency who agree that works are unlikely to present significant risk to Bathing Water or Shellfish Water quality. In addition, Deemed Marine Licence ('DML') conditions have been agreed that enable the EA to view details of relevant method statements forming part of the HDD works prior to the commencement of works. This is captured within the SoCG (document reference 7.5.15) submitted at Deadline 1.</p>	
Deemed Marine Licence and Marine Construction Environmental Management Plan ('CEMP')	<p>The Deemed Marine Licence (DCO Schedule 15 (1)) should also include reference to consultation with the EA on the CEMP.</p>
Applicant's Response	
<p>Taking into account the information supplied to the Environment Agency (Appendix 5 of the SoCG) in relation to the proximity of marine activities comprised in the Proposed Development to Shellfish Waters and the Eastney Bathing Waters protected areas, the Environment Agency and the Applicant agree that works are unlikely to present significant risk to Bathing and Shellfish Water quality. The Environment Agency have now agreed that the Applicant does not need to include reference to consultation with the EA within the Deemed Marine Licence ('DML') on the CEMP however, in order to enable the Environment Agency to manage their responsibilities under the Bathing Water Directive (2006/7/EC) for monitoring and protecting designated bathing waters in England, DML conditions have been agreed to share relevant method statements and notify the Environment Agency prior to works taking place. These agreements are reflected in the SoCG (document reference 7.5.15) submitted at Deadline 1.</p>	

4.11. MARINE MANAGEMENT ORGANISATION (RR-179)

Table 4.12 – Marine Management Organisation

Theme	Summary of RR
Physical Processes	<p>The MMO is broadly satisfied that the potential impacts to physical process have been adequately characterised and assessed.</p>
Applicant's Response	
<p>Noted. This is reflected in the SoCG with the Marine Management Organisation ('MMO') (document reference 7.5.16) submitted at submitted at Deadline 1.</p>	

Theme	Summary of RR
Intertidal and Benthic Habitats	The MMO is broadly satisfied that the potential impacts to intertidal and benthic habitats have been adequately characterised and assessed.
Applicant's Response	
Noted. This is reflected in the SoCG with the MMO (document reference 7.5.16) which will be submitted at Deadline 1	
Underwater Noise	The MMO defer to Natural England for comments on whether the existing environment for marine mammals has been characterised appropriately and whether relevant data sources have been used. The MMO request clarification on some of the metrics used with regards sound pressure levels and has also questioned the appropriateness of the method to convert noise levels in air to noise levels in water.
Applicant's Response	
The Applicant is currently undertaking further consultation with the MMO and Cefas in writing to address these matters. Current status of the queries are reflected in the SoCG (document reference 7.5.16) submitted at Deadline 1.	
Contaminated Sediments	<ul style="list-style-type: none"> a) The MMO requested further clarification on the benthic survey samples and the sample locations for contaminated sediments. The MMO also highlighted that the conclusions made within the contaminated sediment survey report (Appendix 7.3) that relate to PCBs is unclear. b) The MMO has advised that should dredging not commence within 3 years from the date of sampling, additional contaminant analysis may be required and has proposed this as a licence condition (paragraph 7.35).
Applicant's Response	
Further to a meeting held with the MMO and Cefas on 24 March 2020, the matters relating to contaminated sediments within item a) have been resolved. The Cefas advisor stated that the number of samples for contaminated sediments was proportionate and were a good representation of the area. This is reflected in the SoCG (document reference 7.5.16) submitted at Deadline 1.	
Further discussion regarding item b) has been undertaken during the meeting on 24 March 2020 and through review of the draft SoCG by both parties, and the Applicant has questioned the merits of this requirement given that the current analysis provides evidence of the low risk of contaminants being present. Engagement with the MMO on this matter is ongoing and the current status is reflected in the SoCG submitted (document reference 7.5.16) at Deadline 1.	
Further discussion regarding item b) was undertaken during the meeting and the Applicant questioned the merits of this requirement given that the current analysis provides evidence of the low risk of contaminants being present.	
Dredge and Disposal	The MMO comments question whether a registered disposal site is required for the Proposed Development and requested further clarification.
Applicant's Response	
This matter has now been resolved following the meeting held on 24 March 2020 with the MMO and through email communications. Cefas and the MMO agreed that the project does need a designated disposal site. It was also agreed that the approach to dredge and disposal is acceptable, the site disposal characterisation report is comprehensive and Cefas were content to designate the disposal site for the project. Cefas has since provided codes for the disposal site which will be incorporated into the DML. This is reflected in the SoCG (document reference 7.5.16) submitted at Deadline 1.	

Theme	Summary of RR
Herring	<p>a) The MMO comments state that there are some inaccuracies and contradictions in the description of herring spawning habitat within the Fish and Shellfish chapter (Chapter 9 of the ES (APP-124)). The MMO has requested that the data that has been presented is re-issued as a single map and further interrogation of data.</p> <p>b) The MMO's position is that currently the level of risk to herring spawning is uncertain and therefore mitigation is proposed in the form of seasonal restriction to seabed preparation and cable laying activities between 1st November and 31st January. The MMO recognise that it would be impractical to apply such a mitigation measure to the whole Proposed Development area but rather to those areas that have been shown to have suitable sediments for spawning herring and high larval densities. Further refined data analysis is required to identify at a site-specific level the potential risk to herring spawning from the proposed works.</p>
Applicant's Response	
<p>During the meeting held with the MMO and Cefas on 24 March 2020, and through review of the SoCG by both parties, further discussion has taken place regarding the need for the mitigation proposed by the MMO.</p> <p>With regards to a) the Applicant provided further clarification that the UK Marine Cable Corridor within the UK Marine Area does not run through the key herring spawning grounds depicted according to Coull <i>et al.</i> and Ellis <i>et al.</i> and the information is not inaccurate or contradictory.</p> <p>With regards to b) the Cefas advisor maintained that as the Proposed Development runs through herring spawning grounds, irrespective of the magnitude and significance of the effect, then mitigation is required. The Applicant's position is that, as underpinned by the detailed assessment in the Application, the potential effects to herring are not significant and as such no mitigation is required. It was agreed however, that the Applicant would provide additional data analysis and mapping as requested without prejudice to their position that no additional mitigation is required. The additional information has since been shared with Cefas and the MMO (Appendix 9 of the SoCG, document reference 7.5.16) and the MMO has responded to this (Appendix 10 of the SoCG) by reducing the timing restriction from three months to four weeks. This matter remains under discussion and engagement is ongoing. This is reflected in the SoCG (document reference 7.5.16) submitted at Deadline 1.</p>	
Shellfish	<p>The MMO is broadly satisfied that the potential impacts to commercial fisheries have been adequately characterised and assessed and welcomes the mitigation measures proposed. The MMO also requested minor clarifications and identified minor presentational errors.</p>
Applicant's Response	
<p>It has been agreed that these minor comments do not impact the overall outcomes of the assessment and therefore the Applicant does not anticipate making any updates to the chapter. This agreement is reflected in the SoCG (document reference 7.5.16) submitted at Deadline 1.</p>	
Licensing requirements	<p>Paragraphs 6.7 and 6.8: Further associated development within marine environment section point (e) "other works" should include consideration of works such as unexploded ordnance (UXO) investigations and detonations and ongoing additional cable protection works which do not give rise to any materially new or materially different environmental effects from those assessed as set out in the environmental statement.</p>
Applicant's Response	
<p>DCO Schedule 15, Part 1, 4 (5) (Ref: APP-019) has provision of the term 'other works' that are relevant to the Deemed Marine Licence. Further to the meeting held with the MMO and Cefas on 26 March 2020, it was confirmed that a separate marine licence will be applied for UXO safe removal/detonation works (initial agreement with the MMO dates back to September 2018). In addition, the Applicant clarified that the additional cable protection that is proposed for both construction and post-construction phases of the Proposed Development (i.e. additional cable protection to be placed during operation as part of repair and maintenance activities) has already been included and assessed within the Application. The Applicant addressed these comments under separate cover (Appendices 8 and 11 of the SoCG, document reference 7.5.16) and the MMO has since responded (Appendix 8 and 12 of the SoCG). These matters are now considered resolved as reflected in Appendix 8 and 12 of the SoCG submitted at Deadline 1 (document reference 7.5.16).</p>	
DCO	<p>Paras 7.1 to 7.9 relate to Parts 1, 2, 4 and 5 of the DCO where the MMO request clarification to Schedules of the Deemed Marine Licence and various schedules require additions or redrafting. The MMO also recommend that an Outline Operations and Maintenance Plan is provided as a certified document.</p>

Theme	Summary of RR
Applicant's Response	
<p>The Applicant addressed these comments under separate cover (Appendices 8 and 11 of the SoCG, document reference 7.5.16) and the MMO has since responded. These matters are now considered resolved as reflected in Appendix 8 and 12 of the SoCG submitted at Deadline 1 (document reference 7.5.16). It has been agreed that there is no requirement for an Operations and Maintenance Plan</p>	
Arbitration	Paragraphs 7.10 to 7.17 provides the MMO's position on Article 45 (Arbitration) of the DCO.
Applicant's Response	
<p>During the meeting held with the MMO and Cefas on 26 March 2020, the Applicant explained that Article 45 of the DCO (Arbitration) is not effective in connection with the DML as the procedure for appeals that is presented within Part 3 of the DML takes precedence. Engagement is ongoing and this matter is still under discussion. This current status is reflected in the SoCG (document reference 7.5.16).</p>	
DCO Schedule 1	Paragraphs 7.18 to 7.21 states that the MMO requests an Intertidal Works Plan and that any cable burial equipment trials will need to be assessed. They also advised that the unique reference number for the disposal site is included in the final draft DCO.
Applicant's Response	
<p>The Applicant addressed these comments under separate cover (Appendix 8 of the SoCG, document reference 7.5.16) and the MMO has since responded. These matters are now considered resolved as reflected in Appendix 8 of the SoCG submitted at Deadline 1 (document reference 7.5.16). It has been agreed that there is no requirement for an Intertidal Works Plan.</p> <p>Cefas has provided unique codes for the disposal site which will be incorporated into the DML. This is reflected in the SoCG (document reference 7.5.16) submitted at Deadline 1.</p> <p>It has also been agreed that further details regarding the methodology of the cable equipment trials (which are expected to be the same as methods proposed and assessed for the cable installation), location and spatial length can be provided as part of the Cable Burial and Installation Plan which needs to be approved by the MMO.</p>	
DCO Schedule 2	Paragraphs 7.22 to 7.24; the MMO suggest alternative wording for 'commencement of development' and notifications to the MMO prior to commencement.
Applicant's Response	
<p>During the meeting held with the MMO and Cefas on 26 March 2020, the Applicant explained that the Requirements found at Schedule 2 of the DCO do not apply to the DML as these refer to works plans that are landward of Mean High Water Spring ('MHWS') and the notifications to the MMO relevant to the DML are provided for within DML in Condition 2(6) of Part 2.</p> <p>The Applicant addressed these comments under separate cover (Appendix 8 of the SoCG, document reference 7.5.16) and the MMO has since responded. These matters are now considered resolved as reflected in the SoCG submitted at Deadline 1 (document reference 7.5.16).</p>	
DCO Schedule 3	Paragraphs 7.25 to 7.27; the MMO states that they cannot be bound to the time limits stated within Schedule 3 of the DCO which relates to procedures for approvals, consents and appeals.
Applicant's Response	

Theme	Summary of RR
	<p>During the meeting held with the MMO and Cefas on 26 March 2020, the Applicant explained that the Schedule 3 procedure for approvals, consents and appeals are not relevant to the DML and the MMO are not responsible for the discharge of any of these requirements. In these cases, Part 3 of the DML is applicable. Engagement is ongoing and this matter is still under discussion. The current status is reflected in the SoCG (document reference 7.5.16).</p>
DML Part 1	<p>Paragraphs 7.29 requests the inclusion of additional activities to be specified within Part 1, 2 (8) of the DML.</p>
Applicant's Response	
<p>During the meeting held with the MMO and Cefas on 26 March 2020, the Applicant explained that Schedule 15, Part 1, paragraph 4 confirms the extent of the activities which are authorised in connection with Works No. 6 and Works No.7 which restricts this to works which may be necessary or expedient in connection with the authorised development and which fall within the scope of the works assessed by the Environmental Statement. The Applicant addressed this comment under separate cover (Appendix 8 of the SoCG, document reference 7.5.16) and the MMO has since responded. This matter is now considered resolved as reflected in Appendix 8 of the SoCG submitted at Deadline 1 (document reference 7.5.16).</p>	
Cable Protection	<p>Paragraphs 7.3, 7.4, 7.28, 7.30, 7.31, 7.38, 7.39, 7.44 to 7.47: the MMO queries how cable protection deployed during construction and that deployed during maintenance and repair activities has been assessed and requests clarification to ensure that mechanisms to control deployment of cable protection are secured through the DML and controlling documentation.</p>
Applicant's Response	
<p>Further discussion was held during the meeting with the MMO and Cefas on 26 March 2020. It was agreed that the Applicant would prepare a Cable Protection Technical Note in order to address these queries and comments. This Note would also provide evidence that an extended licence for deployment of cable protection during the first 15 years of operation is appropriate. This Note has been shared with the MMO (see Appendix 11 of the SoCG, document 7.5.16) and the MMO has responded (see Appendix 12 of the SoCG). It has been agreed that the assessment of cable protection deployed during construction is considered appropriate and the controls secured through the DML are considered adequate. It has also been agreed that the assessment of cable protection deployed during operation is considered adequate and an operational licence for deployment of cable protection over the first 15 years of operation is appropriate subject to the controls for approvals and notifications as advised within the MMO feedback (in Appendix 12 of the SoCG).</p>	
Micro-siting around reefs	<p>Paragraph 7.33: The pre- construction conditions Part 2, 3 and 4 do not include a requirement to provide details of micro siting around biogenic or geogenic reef features identified as part of the pre-construction monitoring required by DML condition 10 (1). A requirement to provide and gain approval of a micro siting report to detail any micro siting identified as a result of this monitoring should be included. The micro siting report must also include consideration any potential areas subject to disposal as well as cable installation.</p>
Applicant's Response	
<p>During the meeting held with the MMO and Cefas on 26 March 2020, the Applicant explained DML Condition 3 (1)(a)(ii) requires that surveys cannot be carried out until survey details to determine location, extent and composition of any reef identified in the ES and Condition 4(c)(viii) requires details of any required micro-siting in relation to biogenic and geogenic reef habitat within the Order limits seaward of MHWS to be included in the pre-construction Cable Burial and Installation Plan. Condition 10(1) relates to post construction and therefore is not relevant to pre-construction (which is already considered to be adequately covered by Conditions 3 and 4). The Applicant addressed this comment under separate cover (Appendix 8 of the SoCG, document reference 7.5.16) and the MMO has since responded. This matter is now considered resolved as reflected in Appendix 8 of the SoCG submitted at Deadline 1 (document reference 7.5.16).</p>	
DML Part 2, 3	<p>Paragraph 7.32 and 7.36; the MMO highlights that determinations can take longer than 8 weeks when documents submitted are of insufficient quality to be discharged and approved and that failure to make a determination within a set period of time is not sufficient grounds for appeal.</p>
Applicant's Response	

Theme	Summary of RR
	<p>During the meeting held with the MMO and Cefas on 26 March 2020, the Applicant explained that an eight-week period for pre-construction survey approvals is provided for by virtue of the time period for determination being eight weeks. It was discussed whether wording of this condition could allow the MMO longer if the documents are deemed of insufficient quality. Engagement is ongoing and this matter is still under discussion. The current status is reflected in the SoCG (document reference 7.5.16).</p>
DML Part 2, 8	<p>Paragraph 7.37: The Applicant must ensure that the disposal site reference number is included in the final draft of the DCO.</p>
Applicant's Response	
<p>Noted and agreed. Cefas has provided unique codes for the disposal site which will be incorporated into the DML. This is reflected in the SoCG (document reference 7.5.16) submitted at Deadline 1.</p>	
DML Part 2, 10	<p>Paragraph 7.38: the MMO state that the benthic assessment included in the ES will not remain valid for the lifetime of the project and it is recommended that new benthic surveys are undertaken prior to installation of rock protection for cable repairs to ensure that any required mitigation for protected habitats such as <i>Sabellaria</i> reef can be properly secured at the time. Benthic surveys should be carried out every five years and the method statement should be agreed with the MMO prior to construction.</p>
Applicant's Response	
<p>Further discussion was held during the meeting with the MMO and Cefas on 26 March 2020. It was agreed that the Applicant would prepare a Cable Protection Technical Note in order to address this query. This Note also provides evidence that benthic surveys of the whole Marine Cable Corridor are not considered necessary prior to installation of rock protection for cable maintenance or repairs. This Note has been shared with the MMO (see Appendix 11 of the SoCG, document 7.5.16) and the MMO has responded (see Appendix 12 of the SoCG). It has been agreed that the assessment of cable protection deployed during construction and operation is considered appropriate and the controls secured through the DML are considered adequate subject to the feedback provided by the MMO (see Appendix 12 of the SoCG). It is acknowledged that the MMO still requires data that is less than 5 years old to support laying of cable protection during operation and it is agreed that the MMO is content with the Applicant's proposal only to undertake surveys in discrete areas where additional cable protection works are proposed to be undertaken.</p>	
DML Part 2 UXO Activities	<p>Paragraphs 7.40 to 7.43 requests the inclusion of licence conditions relating to UXO activities.</p>
Applicant's Response	
<p>Further to the meeting held with the MMO and Cefas on 26 March 2020, it was confirmed that a separate marine licence will be applied for UXO safe removal/detonation works (initial agreement with the MMO dates back to September 2018) and therefore these conditions would not be required. This is considered to be resolved and is documented in the SoCG (see. (See Appendix 8).</p>	
Mitigation Schedule	<p>Paragraph 7.48: The mitigation schedule summarised in Chapter 6.6 includes relevant references to the DML, however, it is noted that the Applicant has incorrectly referenced Schedule 19, rather than Schedule 15.</p>
Applicant's Response	
<p>Noted and this has been amended in the Mitigation Schedule (APP-498 Rev 002).</p>	

Theme	Summary of RR
Herring	Paragraph 7.49: The MMO consider that the level of risk to herring spawning is uncertain (see 8.50 of this document) and cannot be fully determined on the basis of information provided. Consequently, a precautionary approach should be adopted and the MMO recommends mitigation in the form of a seasonal restriction condition within DML prohibiting any seabed preparation and cable laying activities between 1st November and 31st January.
Applicant's Response	
<p>During the meeting held with the MMO and Cefas on 24 March 2020, further debate took place regarding the need for the mitigation proposed by the MMO. The Cefas advisor maintained that as the Proposed Development runs through a spawning area for herring then mitigation is required.</p> <p>The Applicant's position is that, as underpinned by the detailed assessment in the Application, the potential effects to herring are not significant and as such no additional mitigation is required. It was agreed however, it was agreed that the Applicant would provide the additional analysis and mapping as requested without prejudice to their position that no additional mitigation is required. The additional information has since prepared a Cable Protection Technical Note in order to address this query. This Note also provides evidence that benthic surveys of the whole Marine Cable Corridor are not considered necessary prior to installation of rock protection for cable maintenance or repairs. This Note has been shared with Cefas and the MMO (see Appendix 911 of the SoCG, document reference 7.5.16) and the MMO has responded to this ((see Appendix 1012 of the SoCG) by reducing the 'timing restriction from three months to four weeks. This matter remains under discussion and engagement is ongoing. This is reflected in the SoCG (document reference 7.5.16) submitted at Deadline 1.). It has been agreed that the assessment of cable protection deployed during construction and operation is considered appropriate and the controls secured through the DML are considered adequate subject to the feedback provided by the MMO (see Appendix 12 of the SoCG). It is acknowledged that the MMO still requires data that is less than 5 years old to support laying of cable protection during operation and it is agreed that the MMO is content with the Applicant's proposal only to undertake surveys in discrete areas where additional cable protection works are proposed to be undertaken.</p>	

4.12. NATURAL ENGLAND (RR-181)

ONSHORE

Table 4.13 – Natural England – Onshore

Theme	Summary of RR
Environmental Features	Natural England (NE) identify at paragraph 3.2 of their RR that the designated sites and interest features which may be affected by the project and provided links to avoid potentially out of date or inaccurate documents being referred to. They also advise that Solent and Dorset Coast Special Protection Area is now a fully designated site (post submission).
Applicant's Response	
<p>The Applicant notes Natural England's request that links are utilised with respect to designated sites citations and conservation objectives. The up-to-date documents and the links provided have been used in the assessments. The Applicant acknowledges that the Solent and Dorset Coast Special Protection Area is now a fully designated site. The Habitat Regulations Assessment (HRA) (APP-491) submitted in the Application, while referring to the site as a pSPA, assessed it appropriately through the same manner as for all fully designated sites.</p>	
Ecology	At paragraph 3.3 of their RR NE identify that Wildlife licences (protected species) may be required and advise the applicant to apply at the earliest opportunity and refer to Standing Advice.
Applicant's Response	

Theme	Summary of RR
	<p>The Applicant has submitted a draft method statement to NE with regard to potential licence requirement for badger. A Letter of No Impediment (LONI) was received from NE in this regard and was included in the Application (APP-490). The Applicant will comply with the advice from NE that a full wildlife licence for badger should be applied for at the earliest opportunity following the award of the DCO as identified within the Other Consents and Licences document (Ref: APP-106). No other wildlife licences are expected to be required for the Proposed Development.</p>
Soils and Agricultural Land Use	<p>NE are satisfied that potential impacts on Soils and Agricultural Land Use have been adequately characterised and assessed and would not lead to the loss of over 20 ha of the 'best and most versatile' agricultural land (from NE's RR paragraph 4.3.8).</p>
Applicant's Response	
<p>The Applicant welcomes the confirmation from NE that the impacts on Soils and Agricultural Land Use have been adequately assessed in Chapter 17 (Soils and Agricultural Land Use) of the ES (APP-132).</p>	
Air quality	<p>NE are satisfied that potential impacts of Air Quality of relevance to NE's statutory remit have been adequately characterised and assessed (from NE's RR paragraph 4.1.1).</p>
Applicant's Response	
<p>The Applicant welcomes NE's satisfaction of the assessment of potential impacts within ES Chapter 23 Air Quality (APP-138).</p>	
Landscape	<p>NE advise that further consideration should be given to opportunities for landscape to compensate for adverse effects to the conservation of the wildlife and beauty of the South Downs National Park (from NE's RR paragraph 4.3.7).</p>
Applicant's Response	
<p>The Applicant considers that the landscape mitigation / enhancement provided is appropriate and proportionate to address the landscape and visual effects associated with the Converter Station. Chapter 15 (Landscape and Visual Amenity) of the ES (APP-130) (Tables 15.10 and 15.11) summarise the nature of effects and states that there will be significant adverse effects on landscape character, associated local landscape features, the setting of SDNP and visual receptors during construction. As planting matures, the significance of effects for some visual receptors and Landscape Character Areas 3fi Downland Mosaic will reduce and will not be significant after 10 years. Effects will remain significant on SDNP landscape character (D2 Hambledon and Clanfield Downs) and some immediate residents within a 1.2 km radius of the Converter Station Area, and on some recreational and transport users over very localised sections of PRow and roads within a 3 km radius of the Converter Station Area after 20 years.</p> <p>The Indicative Landscape Mitigation Plans Figure 15.48 (Option B(i)(north) APP-281) and Figure 15.49 APP-282 show the indicative extent of mitigation planting. This includes new areas of woodland, scrub and hedgerows as well as the creation of woodland glades and naturalistic landforms around the edge of the Converter Station to mitigate landscape and visual effects where possible. Such measures are described in the Outline Landscape and Biodiversity Strategy (APP-506) which has now been updated (APP-506 Rev002). Proposals also seek to maintain existing hedgerows / hedgerow trees within the Order Limits in perpetuity on the basis that the existing vegetation already forms an important screen function. Measures applied to existing vegetation includes restrictions associated with the removal of hedgerows / trees, introduction of new hedgerows / hedgerow trees, gapping up of existing hedgerows and new hedgerow planting to replace hedgerows grubbed out within the Order Limits.</p> <p>The Applicant considers that the landscape mitigation / enhancement provided is appropriate and proportionate to address the landscape and visual effects associated with the Converter Station (Indicative Landscape Mitigation Plans, Figures 15.48 & 15.49 of the ES (APP-281 and 282)).</p> <p>Indicative Landscape Mitigation Plans for Option B(ii) north and south (<i>Doc ref 7.7.8</i>), have been produced and are to be submitted alongside this response.</p>	

Theme	Summary of RR
Landscape	<p>NE refer to national planning policy, including paragraph 172 of the NPPF which sets out criteria to determine whether development should exceptionally be permitted within a designated landscape, alongside advising significant weight be given to the advice of the landscape advisor/planner for the National Park, including the agreement of a landscape strategy (including monitoring and management) for the Converter Station Area (from NE's RR paragraph 4.3.7).</p> <p>Whilst welcoming the commitment to a Landscape and Biodiversity Strategy (and advise details are progressed in agreement with the district ecological and landscape officers to ensure a positive effect on the natural environment and meet the principles set out in NPPF paragraph 170), and requirement 7 of the draft DCO (from NE's RR paragraph 4.1.5), NE consider that given the impacts to landscape character, including adverse effects on people using Monarch's Way, further consideration needs to be given to compensation opportunities (or funding) for landscape enhancements within the South Downs National Park and include the landscape principles within the NPPF (from NE's RR paragraph 4.3.7).</p>
Applicant's Response	
<p>The Applicant is continuing discussions with SDNPA over the content of the Outline Landscape and Biodiversity Strategy (OLBS) (APP- 506) which has been developed on the principles of the NPPF, with dDCO (APP-019) Requirement 7 Provision of landscaping and 8 Implementation and maintenance of landscaping securing the OLBS. The OLBS has been updated to reflect ongoing discussions refer to APP-506 Rev002. A detailed landscaping scheme will be submitted for approval by the relevant discharging authority which will include detailed landscape mitigation plans together with management, maintenance and monitoring plans (paragraph 1.1.3.5 to 1.1.3.10 of the updated OLBS) alongside management responsibilities (paragraphs 1.8.3.1 to 1.8.3.10 of the OLBS).</p> <p>Requirement 7 of the dDCO requires a detailed landscaping scheme to be submitted and approved by the relevant planning authority in consultation with the South Downs National Park before any phase of Works No. 2 Commence.</p> <p>Mitigation measures identified through the draft DCO, referred to in relevant ES Chapters, OOCEMP (APP-505), OLBS (APP-506) and design principles referred to in the Design and Access Statement (APP-114) will ensure impacts are sufficiently mitigated.</p>	
Ecology (Solent Waders & Brent Geese Strategy)	<p>Advise the onshore cable runs adjacent to designated sites and through sites identified as supporting habitat in the Solent Waders and Brent Goose Strategy (SWBGS) and would prefer for the Proposed Development to be located outside the network of sites (from NE's RR paragraph 4.3.4).</p> <p>Regarding the Winter Working Restriction for Features of Chichester & Langstone Harbours SPA, NE seek further information in relation to the following principles to determine the impact:</p> <p>1 – whilst NE is content with the proposed exception of site P11, require a plan of this exclusion area to be agreed and secured within the construction method statement (to include reinstatement in advance of 01 October).</p> <p>2 - recommend further consideration is given to noise and visual disturbance, including buffer zones from the proposed construction works on, adjacent or nearby SWBGS sites during the overwintering period. Note 'low use' sites are not part of the working restrictions and recommend Candidate and Low Use sites are also included in the working restriction.</p> <p>7 & 8 - advise the restriction in Principle 7 to Chichester and Langstone Harbour SPA is amended to consider the nearest point of the SPA or any SPA supporting habitat during the over-wintering period.</p> <p>Recommend further consideration is given to the visual disturbance (e.g. visual screening of construction works) of SPA birds during the overwinter period.</p>
Applicant's Response	
<p>The ES Addendum (document reference 7.8.1) details that works will be complete for the over-wintering bird season at Solent Waders and Brent Goose Strategy (SWBGS) sites. All affected sites will be subject to grassland restoration in order to return habitat to optimal condition before October. At SWBGS site P08A Farlington Playing Fields, works will be complete prior to the onset of the wintering period where intertidal birds return from their breeding grounds. However, re-turfing will likely only be possible at the start of October and is estimated that a minimum of 2-3 weeks would be required for re-establishment of the grass sward required to permit grazing by brent geese, a Qualifying Feature of Chichester and Langstone Harbour SPA and a wintering intertidal</p>	

Theme	Summary of RR
	<p>bird which feeds on grasses within SWBGS sites. The temporary habitat loss accounts for just 1.2% of the SWBGS core sites and 0.2% of the SWBGS network. There will be no perceptible change to baseline conditions. Brent geese will still be able to utilise the majority of Farlington SWBGS which in itself forms just a small component of the SWBGS network available.</p> <p>This conclusion is further supported by the fact that the loss of habitat will be temporary, covering at most 17% of a single non-breeding season and during a period when the majority of the Solent Brent Goose population would not be present.</p> <p>The Applicant notes the recommendation to consider use of screening for visual disturbance of SPA birds during their overwinter period. In addition, it is acknowledged that a plan of the exclusion area for SWBGS site P11 will be agreed with NE prior to construction and secured within the construction method statement.</p> <p>With regards to Principle 2 the Applicant and NE have previously agreed to exclude SWBGS sites showing low-use (“low-use sites”) from the winter restrictions outlined in Appendix 16.14 (Winter Working Restriction for Features of Chichester & Langstone Harbours SPA) of the Environmental Statement (ES) (APP-422). This was agreed at a consultation meeting held at the Eastleigh Natural England Offices on 6th February 2019. This decision is recorded under point 10 within the circulated meeting minutes. Nevertheless, the Applicant has continued dialogue with Natural England to provide further information on low use sites and to provide information on the application of their advice with respect to Principles 7 and 8. and has provided the Construction Noise Impacts on SWBGS Sites Report (APP-xx). The Report includes an update to the Winter Working Principles and has informed both the updated ES Addendum (doc ref 7.8.1) and the updated HRA Report (APP-491 Rev002). The update to the principles is captured in the revised Outline Onshore Construction Environmental Management Plan (APP-505 Rev002). With the exception of HDD-3 and HDD-6, HDD works will not impact SWBGS following the application of noise barriers which will prevent any noise effects of over Natural England’s advised threshold (69 dB LAFmax) reaching SWBGS sites. HDD-3 noise levels will not extend beyond the site compound and therefore only impact hardstanding habitat and not effecting the integrity of the SWBGS. Noise levels from HDD-6 marginally overlap with the P23A SWBGS. However, as the HDD compound lies within the SWBGS, it is already subject to Principle 1 so that winter work (October to March inclusive) is restricted.</p> <p>Noise levels from trenching and road saw cutting works of over 69 dB LAFmax includes overlap with multiple SWBGS sites and therefore leads to the potential for impacts through disturbance on brent geese. To prevent any adverse impacts on the integrity of the SWBGS (and to follow Natural England’s advice) a restriction of construction working during October to March for all sites highlighted with the exception of P54 and P29 is mandated.</p> <p>Trenching and road saw cutting works are also restricted at Milton Locks and Longshore Way due to the potential for noise levels of over 69 dB LAFmax to occur within intertidal habitat of Chichester and Langstone Harbours SPA.</p> <p>On the basis of the assessment of impacts from HDD and trenching / road saw construction works, a conclusion of no significant effects on the SWBGS network is reached and there is considered to be no adverse effect on the integrity of Chichester and Langstone Harbours SPA.</p> <p>The points are subject to ongoing discussions and will be addressed within an agreement with Natural England within the SoCG to be submitted at Deadline 1 and updated during the Examination.</p>
<p>Denmead Meadows & Kings Pond</p>	<p>NE welcome the recognition of the sensitive lowland meadow habitats at Denmead as being of national importance and reaffirm the preference for avoidance (noting the now discounted highway option). Notwithstanding NE welcome the proposal to HDD under part of Denmead Meadows and note the limitations due to technical constraints but raise concerns on the location of the construction compound, jointing bay and trenched cable section resulting in damage and residual loss of biodiversity (including Priority Meadow 3 and MG5 grassland). NE request further information to inform the mitigation measures and compensation measures (from NE’s RR paragraph 4.3.5).</p> <p>Regarding the botanical survey requested, NE raise concerns about the reliance on DAFOR values and that detailed botanical surveys were not undertaken of all affected fields, with no green orchid population counts.</p> <p>Concerning future capacity for restoration to MG5, NE requests additional information to further inform a comprehensive mitigation, management and monitoring strategy to ensure no residual loss.</p> <p>Concerned that the development proposal has not set out how it will address all residual losses, including lowland meadow, broadleaf trees and woodland, species-rich hedgerow, loss of semi-improved and calcareous grassland.</p>

Theme	Summary of RR
Applicant's Response	
<p>Impacts on lowland meadow habitats at Denmead Meadows have been assessed within Chapter 16 (Onshore Ecology) (APP-131) of the ES. Through the design process the Applicant has determined that the route through Denmead Meadows is the only feasible option for construction. This has been established through consultation meetings with NE (namely that held at NE's Eastleigh offices on the 17th July 2019). The Proposed Development has committed to mitigation and habitat creation through the OLBS which summarises proposed mitigation and associated landscape planning proposed within the ES, including Chapter 16 (Onshore Ecology), which lists measures relating to Denmead Meadows (which incorporates both Kings Pond SINC and Soake Farm Meadows SINC). The use of HDD techniques (which avoid the entirety of Soake Farm Meadows SINC) and by minimising working areas within Denmead Meadows, such as reducing the size of compounds and working areas associated with joint bays and trenches, demonstrates this. Post-construction mitigation and habitat creation is detailed within section 1.5 and 1.6 of the updated Outline Landscape and Biodiversity Strategy (OLBS) (APP-506 Rev002). This includes detailed mitigation proposals for Denmead Meadows as presented in the ES Addendum (doc ref 7.8.1). Detailed proposals for the implementation of these measures will be developed during the detailed design phase. It should be noted that the Order Limits only cover part of the lowland meadow at Denmead Meadows and long-term management of the wider area would require agreement with landowners which would be outside the control of the Applicant and is not considered to be necessary in connection with the Proposed Development. Botanical surveys were undertaken to inform the assessment of ecological impacts within ES Chapter 16 (Onshore Ecology) (APP-131) and develop plans for mitigation and habitat creation within the OLBS (APP-506). The surveys were sufficient for this purpose. The Applicant recognises that further surveys may be beneficial for the detailed design phase where plans for implementation of the OLBS and mitigation will be developed further. Scope of such surveys was discussed with NE during a consultation meeting on the 27th February 2020. Through the design process the Applicant has determined that the route through Denmead Meadows is the only feasible option for construction. This has been established through consultation meetings with NE (namely that held at NE's Eastleigh offices on the 17th July 2019). The Proposed Development has committed to mitigation and habitat creation through the OLBS which summarises proposed mitigation and associated landscape planning proposed within the ES, including Chapter 16 (Onshore Ecology), which lists measures relating to Denmead Meadows (which incorporates both Kings Pond SINC and Soake Farm Meadows SINC) and it is not considered to be necessary in connection with the Proposed Development.</p>	
Other non-designated sites and biodiversity	<p>NE welcomes the commitment to a Landscape and Biodiversity Strategy but consider this should include measures for mitigating impacts on protected species and habitats and include biodiversity compensation measures for any residual biodiversity losses that cannot be fully mitigated on site.</p> <p>Recommend the Defra biodiversity metric be used to calculate the biodiversity value of sites (from NE's RR paragraph 4.3.6).</p>
Applicant's Response	
<p>The Applicant's position with regard to the proposed biodiversity enhancements is explained in the submitted Biodiversity Position Paper (doc Ref 7.7.9).</p>	
Arboriculture	<p>Request impacts on ancient woodland and ancient and veteran trees in line with NPPF paragraph 175.</p> <p>NE note that a buffer of 15 metres will be retained between the ancient woodland and the proposed development. Standing advice refers to a minimum of 15 metres and it is NE preference that the buffer extents to at least 50 metres to ensure there will be no detrimental impact to this valuable habitat (from NE's RR paragraph 4.3.6).</p>
Applicant's Response	
<p>The Applicant has ensured that the Proposed Development achieves the minimum buffer of 15 m from the Order Limits to Ancient Woodland as per NE Standing Advice. Section 1.5.4 of the OLBS outlines the specific offsets and constraints, including around specific features at the Converter Station Area. Works Compound and Laydown Area would be prohibited within 15 m of the ancient woodland and hedgerows. When storing materials, particularly liquids, slopes and drainage channels would be used to prevent spillages and flow into the buffer zone of the ancient woodland and hedgerows.</p> <p>The Arboricultural Report (APP-411) references buffer zones in relation to distances provided within paragraph 175 of the NPPF and standing advice. The approach has also been adopted taking into account paragraph 5.3.14 of the NPS (EN-1), which specifically focusses on ancient woodlands and veteran trees.</p>	

Theme	Summary of RR
Cumulative	<p>Advise potential cumulative impacts (from NE's RR paragraph 4.3.9) of construction with</p> <ol style="list-style-type: none"> 1) two existing Flood and Coastal Erosion Management Schemes; 2) the impact on the agreed and the residential development at Fraser Range. The former includes detailed working restrictions and mitigation measures at Milton Common as part of the 19/01368/FUL, and advise that any cumulative effects of these schemes are considered in the EIA and HRA assessment; and 3) the residential development at Fraser Range.
Applicant's Response	
<p>1. The North Portsea Island Coastal Defence Scheme is the project of concern and is being developed by the Eastern Solent Coastal Partnership (ESCP). Phase 4 of the Scheme 'Eastern Road and Kendall's Wharf' is relevant. The North Portsea Island Phase 4A Kendall's Wharf Eastern Road Portsmouth project (19/00706/FUL) was included in the cumulative assessment as project ID number 62. A summary of cumulative effects for ES technical chapters is provided in ES Chapter 29 (Cumulative Effects) (Ref APP-144). The detailed assessment of cumulative effects in relation to Phase 4A Kendall's Wharf project (19/00706/FUL) and designated sites and supporting habitats is located within Appendix 16.15 (Onshore Ecology CEA Matrix Stage 1 & 2) (Ref APP-423).</p> <p>The North Portsea Island Phase 4B Coastline Between Milton Common and Kendall's Wharf Eastern Road, Portsmouth project (19/01368/FUL) was validated on the Portsmouth City Council planning portal in September 2019 and granted conditional permission in February 2020, as a result, Phase 4B was not assessed as part of the cumulative assessment for the ES, submitted November 2019.</p> <p>The following potential effects have been identified which have the potential to act cumulatively between the Proposed Development and ESCP Phase 4b:</p> <ol style="list-style-type: none"> 1. Temporary habitat loss of SWBGS; and 2. Disturbance of birds within Chichester and Langstone Harbours SPA and SWBGS; <p>.</p> <p>All cumulative effects relate to both the AQUIND EIA and HRA due to their effect on Natura 2000 sites. The Phase 4B development has been assessed as part of the ES Addendum (doc ref 7.8.1) to be submitted with this document.</p> <p><u>Temporary habitat loss of SWBGS</u></p> <p>It is the Applicants understanding that the Construction Environmental Management Plan (CEMP) North Portsea Island Phase 4B no longer includes provision for compensation areas for habitat loss within Milton Common. The CEMP commits to restoration of all SWBGS prior to the onset of the non-breeding season in October. These proposals match those made by the Proposed Development and therefore there is no prospect of a contribution to a cumulative impact with respect to temporary habitat loss.</p> <p><u>Disturbance of birds within Chichester and Langstone Harbours SPA and SWBGS</u></p> <p>Following the key principles outlined in ES Appendix 16.14 (Winter Working Restriction for Features of Chichester & Langstone Harbours SPA) (Ref. APP-422), all potential effects from the Proposed Development are offset. Following consultation with Natural England these principles have been updated and captured in the Outline Onshore Construction Environmental Management Plan (OOCEMP (APP-505 Rev002). Furthermore, the ESCP Phase 4b proposal has a complete winter working restriction. Therefore, there will be no cumulative effects on non-breeding features of Chichester and Langstone Harbours SPA. The, scope of the updated principles and applications of a winter working restrictions are now subject to an agreement with Natural England within the SoCG (document ref: 7.5.11). It is concluded therefore, there will be no cumulative effects on breeding features of Chichester and Langstone Harbours SPA.</p> <p>3. Fraser Range (19/00420/FUL) was included as development ID 66 in the onshore cumulative assessment as a Tier 1 development (Ref APP-485). The HRA states in paragraph 8.3.1.1 that ES Appendix 16.15 and 16.16 (Ref APP-423 and APP-424) details the schemes which could cause cumulative effects to onshore ecological features. It is therefore considered that the cumulative effect of this development has been adequately assessed in the EIA.</p>	
Decommissioning	Limited information has been provided about the impacts at the decommissioning stage (from NE's RR paragraph 4.3.10).

Theme	Summary of RR
	Whilst onshore cables will be left in situ it is advised that this is considered further. If further planting and offsetting is required at this stage, we advise that this is undertaken at the earliest opportunity to allow the replacement habitats and species to establish and reach maturity.
Applicant's Response	
ES Chapter 3 Description of the Proposed Development (APP-118) advises at paragraph 3.3.1.3 that 'development consent for decommissioning is not sought as part of the application'.	
CEMP	NE advises a Construction Environmental Management Plan (CEMP) should be submitted to and approved in writing by the district ecologist/biodiversity officer (from NE's RR paragraph 4.3.11).
Applicant's Response	
The Applicant confirms that Requirement 15 of the dDCO (APP-019) requires the submission of a Construction Environmental Management Plan ('CEMP'). As detailed by NE this will be submitted to and approved by the relevant planning authority who have responsibility for ecology/biodiversity. The CEMP will cover all potential impacts detailed by NE. Such impacts are addressed, and mitigation proposed, where relevant, in Chapter 16 (Onshore Ecology) of the ES (APP-131).	

MARINE

Table 4.14 – Natural England – Marine

Theme	Summary of RR
Overall Position	<p>NE is satisfied that the potential impacts on the following components (of relevance to NE's remit) have been adequately characterised and assessed (from NE's RR paragraph 4.1.1).</p> <ul style="list-style-type: none"> • Physical Processes • Marine Water and Sediment Quality • Intertidal and Benthic Habitats • Fish and Shellfish • Marine Mammals and Basking Sharks • Marine Ornithology <p>MCZ assessment (Appendix 8.5)</p>
Applicant's Response	
Noted and confirmed in teleconference held on 26 March 2020. This matter is reflected in a SoCG with Natural England. (document reference 7.5.12).	
Habitats Regulations Assessment	<p>Natural England is satisfied that it can be excluded beyond reasonable scientific doubt that the project would not have an adverse effect on the integrity of the following European Sites (from NE's RR paragraph 4.1.2):</p> <p>Solent Maritime SAC South Wight Maritime SAC</p>

Theme	Summary of RR
	Solent and Isle of Wight Lagoons SAC Wight-Barfleur SAC Studland to Portland SAC River Itchen SAC River Avon SAC Solent and Dorset Coast pSPA (now Solent and Dorset Coast SPA) Solent and Southampton Water SPA/Ramsar site Pagham Harbour SPA/Ramsar site Alderney West Coast and Burhou Islands Ramsar site
Applicant's Response	
Noted and confirmed in teleconference held on 26 March 2020. This matter is reflected in the SoCG submitted at Deadline 1 (doc ref 7.5.12).	
Red Breasted Merganser	In Tables 2.1 and Table 2.2 of their RR, NE identified that these designated sites relevant to Red Breasted Merganser may be affected by the proposed Project: Chichester and Langstone Harbour SPA Portsmouth Harbour SPA Langstone Harbour SSSI
Applicant's Response	
Further to the teleconference held on the 26 March 2020, NE clarified that red breasted merganser should have been removed from these two tables in the Relevant Representation. NE are satisfied that the marine ornithological features assessed of these sites will not be affected by the Proposed Development and that adequate assessment has been undertaken to evidence this beyond scientific doubt. This matter is reflected in the SoCG, (document reference 7.5.12).	
Solent and Dorset Coast SPA	NE advised that the Solent and Dorset Coast Special Protection Area (SPA) is now a fully designated site (no longer a pSPA) (from NE's RR paragraph 4.3.12).
Applicant's Response	
Noted. Further to the teleconference held on the 26 March 2020, the Applicant advised that the HRA will be updated and submitted to reflect this change and this does not change the results or site assessment, where the main assessment of this site is undertaken. In addition, the ES Addendum (document reference 7.8.1) acknowledges this change.	
Cumulative Effects	NE has requested further consideration of the Phase 4B North Portsea Island Coastal defence Project and the Fraser Range Southsea Project within the EIA and HRA (from NE's RR paragraph 4.3.9).
Applicant's Response	
Further to the teleconference held on the 26 March 2020 with NE, NE clarified that they were content with the cumulative assessments undertaken for marine topics and that these comments relate to the onshore topics of the Proposed Development.	
Marine Conservation Zone (MCZ)	NE is satisfied that there is no significant risk of the project hindering the conservation objectives of the following MCZs (from NE's RR paragraph 4.1.3): Offshore Overalls Utopia

Theme	Summary of RR
	Bembridge Selsey Bill and the Hounds Offshore Brighton
Applicant's Response	
Noted and confirmed in teleconference held on 26 March 2020. This matter is reflected in the SoCG (document reference 7.5.12).	
Development Consent Order (DCO)/Deemed Marine Licence (DML)	NE provided comments on the DCO and DML, querying some definitions as well as the provisions for securing control of the deployment of additional cable protection during the operations and maintenance phase of the Proposed Development. NE also made comment on the matter of arbitration in Article 45 and queried the provisions for micro-siting around biogenic or geogenic reef within the DML (from NE's RR section 5).
Applicant's Response	
Further to the teleconference held on the 26 March 2020 with NE, and review by both parties of the SoCG, further discussions were held on these comments. It was agreed that the Applicant would prepare a Cable Protection Technical Note in order to address Issue Nos. 2, 4 and 6 of the RR. This Note was shared with the Natural England (see Appendix 9 of the SoCG, document reference 7.5.12) and Natural England responded (see Appendix 10 of the SoCG). It has been agreed that the assessment of cable protection deployed during construction and operation is considered appropriate and the controls secured through the DML are considered adequate subject to the feedback provided by Natural England (see Appendix 10 of the SoCG). This Note also provides evidence that benthic surveys of the whole UK Marine Cable Corridor are not considered necessary prior to installation of rock protection for cable maintenance or repairs. Natural England is content with the Applicant's proposal only to undertake surveys in discrete areas where additional cable protection works are proposed to be undertaken. Regarding Issue No.7 and micro-siting around reefs, Natural England considers that there is adequate provision within the DML to identify and agree any micro-siting to avoid reef habitat. This matter is now resolved and this is reflected in the SoCG (document reference 7.5.12).	
Regarding Issue Nos. 1, 3 and 8 on arbitration and appeals, engagement is ongoing and matters are still under discussion. The current status is reflected in the SoCG (document reference 7.5.12).	

4.13. DENTONS UK & MIDDLE EAST LLP ON BEHALF OF NETWORK RAIL INFRASTRUCTURE LTD (RR-182)

Table 4.15 - Dentons UK and Middle East LLP on Behalf of Network Rail Infrastructure Ltd

Theme	Summary of RR
Compulsory Acquisition and protective provisions	Network Rail objects to the inclusion of Plot 7-11 in the draft Order and to the grant of compulsory acquisition powers in respect of this land. Network Rail also objects to all other compulsory powers in the draft Order to the extent that they affect, and may be exercised in relation to, Network Rail's property and interests. Network Rail provided detailed comments on the form of the protective provisions and intend to propose revised wording as part of the direct discussions with the Applicant.
Applicant's Response	

Theme	Summary of RR
<p>The Applicant is currently engaged with Network Rail in relation to the Proposed Development and in particular the protective provisions that are to be included within the dDCO (Doc Ref) and will report to the Examining Authority on the outcome of those discussions in due course.</p>	

4.14. MARTA KARPEZO ON BEHALF OF SOUTHERN WATER SERVICES LTD (RR-192)

Table 4.16 - Marta Kappezo on Behalf of Southern Water Services Ltd

Theme	Summary of RR
<p>DCO and protective provisions</p>	<p>Southern Water Services have requested appropriate protective provisions to ensure the protection and the ongoing maintenance of SWS's assets.</p>
<p>Applicant's Response</p>	
<p>The Applicant is seeking to engage with Southern Water Services Ltd in relation to their concerns and will report to the Examining Authority on the outcome of those discussions in due course.</p>	

4.15. HISTORIC ENGLAND (RR-199)

ONSHORE

Table 4.17 – Historic England – Onshore

Theme	Summary of RR
<p>General</p>	<p>Historic England consider that there is potential for the development to impact upon the historic environment, and that without mitigation this impact will be significant in relation to some receptors, including maritime, aviation and prehistoric heritage assets within the marine cable corridor and designated heritage assets within the onshore cable route.</p>
<p>Applicant's Response</p>	
<p>The Applicant notes the position of Historic England and welcomes future engagement on these issues. The Applicant is currently engaged with Historic England and hopes to establish an agreed approach through the SoCG, to be submitted at the relevant deadline.</p>	
<p>Heritage (ORS)</p>	<p>Historic England consider that the proposed siting and scale of the Optical Regeneration Station will cause some harm to the view from Fort Cumberland towards Fort Cumberland Road. Historic England request to see this line of sight maintained to maximum extent through the redesign or repositioning of the ORS.</p>
<p>Applicant's Response</p>	
<p>The Applicant acknowledges that the ORS would be visible in views from the western ravelin from Fort Cumberland. Although the western ravelin may have slight views of the proposed ORS, the overall effect is assessed in ES Chapter 21 (Heritage and Archaeology) (APP-136) and is confirmed as being of negligible significance prior to the implementation of mitigation measures at</p>	

Theme	Summary of RR
	<p>paragraph 21.6.4.31. The ORS would sit within and be viewed as part of the surrounding urban fabric, which comprises a nearby housing estate (15m to the north of the ORS) and a holiday park, located 25m to the south which is bounded by tall trees.</p> <p>The ORS buildings would not be visually intrusive from the ravelin itself (which is raised). The buildings have been designed to blend into the immediate environment to reduce its visual prominence in views out from the asset towards the Site. It has also been designed to be lower than the nearby houses and the line of tall trees from the holiday park which have already compromised the open coastal plain when looking from the western ravelin out towards the Site.</p> <p>Several options were explored for the location of the ORS, including different locations within the car park itself. Taking all options into account, whilst also considering other environmental constraints, the present location on the northern edge of the car park was considered to minimise the potential impact on Fort Cumberland the most and also retains continuous views to Fort Cumberland Road. Following further engagement, prior to examination it was agreed that an additional visualisation reusing an existing viewpoint (Viewpoint no. 22 from the Landscape and Visual Amenity assessment; APP-289, Rev02) would be produced, to inform design and positioning of the proposed ORS building within the Landfall car park. The additional visualisations are contained within Appendix 5 of the ES Addendum (document reference 7.8.1.5). These provide a representation of the proposed ORS from the area near the fort's western ravelin, represented as a single block for each building (with each of the siting options shown individually).</p>

MARINE

Table 4.18 – Historic England – Marine

Theme	Summary of RR
Marine Archaeology and Outline Written Scheme of Investigation (WSI)	<p>Historic England advise that the marine WSI provides for further investigations as a key mechanism to inform the final stages of project planning, should consent be obtained. Historic England recommend that the WSI is produced and agreed pre-commencement.</p>
Applicant's Response	
<p>Further to a teleconference held on the 16 March 2020 with Historic England (HE), HE confirmed that they are still examining the Application. Subject to formalising and submitting a Written Representation, HE advised in a subsequent teleconference (16 March 2020) that they do not anticipate any reason why the SoCG cannot reflect that HE is satisfied that the potential impacts to marine archaeology have been adequately characterised and assessed. Similarly, HE also advised that pre-application engagement on the WSI has been adequate. As a result, HE anticipates that the WSI submitted with the Application sets out the appropriate measures to mitigate potential impacts and the appropriate measures for updates to the document prior to commencement of works. These matters are reflected in the SoCG currently being developed between HE and the Applicant (document reference 7.5.13).</p>	
DML	<p>Historic England advise that they are looking for adequate provision for the delivery of the WSI within the deemed Marine Licence with appropriate timescales for review and approval of the WSI prior to commencement of works.</p>
Applicant's Response	
<p>Further to the teleconference held on the 16 March 2020, HE confirmed that they are still examining the Application. Subject to formalising and submitting a Written Representation, HE does not anticipate any reason at this time why they cannot agree that they are satisfied with the provisions of the DML in respect of marine archaeology interests. This matter is reflected in the SoCG currently being developed between HE and the Applicant (document reference 7.5.13).</p>	

4.16. DEFENCE INFRASTRUCTURE ORGANISATION

Table 4.19 – Defence Infrastructure Organisation

Theme	Summary of RR
Shipping, Navigation and Other Marine Users and Navigation Risk Assessment (NRA)	The offshore cable route will intersect military Danger Area D037 however the Ministry of Defence have no safeguarding concerns with the cable route passing through this danger area. The Ministry of Defence have no other offshore safeguarding concerns with this proposal however historic explosive munitions disposal sites and unexploded ordnance (UXO) should be taken into account. There are also no safeguarding concerns with the onshore cable route.
Applicant's Response	
The Applicant acknowledges the representation and the reference to historic explosive munitions disposal sites and UXO. The Applicant will take these matters into account and will consider them, in consultation with the MOD, in any future applications where relevant.	

5. MEMBERS OF THE PUBLIC AND BUSINESSES

5.1. TRAFFIC

PINS Ref	Respondent	
Disruption		
RR-010	Elaine Husselby	Summary of Relevant Representation
RR-024	Susan Cox	
RR-029	David Jeffery	Significant disruption to congested roads and junctions, including residential streets and cycle routes, and on parking
RR-042	Veronica Knight	
RR-046	Polly Beard	Applicant Response
RR-048	Judith Ann Clementson	
RR-050	Patrick Whittle	Section 1.13 of the Transport Assessment (Appendix 22.1 of the Environmental Statement (ES)) (APP-448) addresses the impacts on sustainable transport networks. The effects of the Onshore Cable Corridor temporary works have been carefully considered and the changes to the operation of the highway network (both positive and negative) are temporary with the highway network returning to normal levels of operation following the completion of the works.
RR-051	Cynthia Whittle	
RR-059	Alison Bee	The Applicant anticipates that the proposed works will cause some level of disruption and the impacts of construction have been fully assessed within Appendix 22.1 (Transport Assessment) of the ES (APP-448). Appendix 22.1A (Framework Traffic Management Strategy (FTMS) of the ES (APP-449) sets out an indicative programme to mitigate the impacts of these works where practicable. Both the indicative construction programme and the Onshore Cable Corridor have been developed in consultation with the stakeholders and the public to take account of environmental constraints, public events, school terms and public holidays.
RR-061	Ingie Porteous	
RR-066	Richard Salt	An Outline Construction Traffic Management Plan (CTMP) (Appendix 22.2 of the ES) (APP-450) has also been submitted which sets out the framework for managing construction traffic associated with the Proposed Development.
RR-072	Vienna Crimes	
RR-073	Allison Udy	
RR-074	Ann Farrelly	
RR-075	Annette Sartori	
RR-080	Dan Brookes	
RR-083	Dawn Gilbert	
RR-084	Deborah Cutlet	
RR-097	Ian Daye	
RR-106	Kirstin Knowlson-Clark	
RR-111	Lynn Mills	
RR-115	Mark Lacey	
RR-121	Neil Hawkins	

PINS Ref	Respondent	
RR-123	Pam Wilkie	
RR-127	Peter James	
RR-128	Rachel James	
RR-137	Tracy Smith	
RR-139	Trudy Farley	
RR-140	Victoria Campbell	
RR-145	Andrea Fay Smith	
RR-149	Bernard Johnson	
RR-150	Bruce Graham	
RR-151	Carol Tarr	
RR-166	Hannah Payne-Cook	
RR-102	Keith Baker	
RR-170	Jan Leonard	
RR-171	John Townsend	
RR-176	Loma Wilkinson	
RR-178	Malcolm Smith	
RR-188	Ruth Taylor	
RR-189	Sally Englefield	
RR-193	Terrence Garnett	
AS-022	Martin Lock	
AS-021	Karren Griffiths	
AS-020	Sally Carter	
RR-158	Dana Bubenickova	
RR-150	Bruce Graham	
RR-160	David Bailey	
RR-039	Jeremy Warren	
RR-154	Christopher Burrowes	
RR-056	Andrew Rowley	

PINS Ref	Respondent	
RR-116	Michelle Juchau	
RR-013	Martin Farrelly	
RR-066	Richard Salt	
RR-150	Bruce Graham	
RR-140	Victoria Campbell	
RR-166	Hannah Payne-Cook	
RR-152	Chris Seaton	
RR-184	Peter Hicks	
RR-191	Cllr Simon Boshier	
AS-022	Martin Lock	
RR-017	Brenda Lock	
RR-044	Cllr Caroline Brook	
Access to Holiday Inn Express Portsmouth (North)		
RR-148	David Lock Associates on behalf of Atlas Hotels	<p data-bbox="872 1039 2783 1102">Summary of Relevant Representation</p> <p data-bbox="872 1108 2783 1192">Atlas Hotels express general support for the Proposed Development, however, raise concerns regarding the proposed construction activities and seek that mitigation is in place to safeguard the amenity of the Holiday Inn Express Portsmouth (North) and wider area.</p> <p data-bbox="872 1199 2783 1241">It is requested that 24 hour working shifts be kept to a minimum and advance warning of these shifts is provided to the neighbouring business.</p> <p data-bbox="872 1247 2783 1331">It is requested that no construction vehicles park within the hotel's car park or in such a way to block access to the hotel and that the existing highway arrangement in front of the hotel is maintained during the construction process or restored if necessary.</p> <p data-bbox="872 1337 2783 1400">Applicant Response</p> <p data-bbox="872 1407 2783 1596">The Applicant welcomes the general support for the Proposed Development from Atlas Hotels. The Applicant refers to Section 8.2 of Appendix 22.2 (Framework Construction Traffic Management Plan) (FCTMP) (APP-450) of the ES. Specific details regarding construction traffic management and construction management will be set out in the detailed Construction Traffic Management Plans (CTMPs) which are required to be submitted and approved in accordance with dDCO Requirement 17. The detailed CTMPs will align with the principles set out in Section 3 'Vehicular Movement Management' of Appendix 22.2 (FCTMP) of the ES (APP-450).</p> <p data-bbox="872 1602 2783 1820">The car park of Holiday Inn Express in Portsmouth (North) is not contained within the Order Limits and as such is not considered for further mitigation. The access road to this car park is included within the Order Limits but is not intended to form part of the Onshore Cable Route and such it will unlikely be impacted by construction activities other than by vehicles gaining access to and egressing from, the HDD location in Farlington Playing Fields. Detailed CTMPs will be produced for each section of the Onshore Cable Corridor, these will include specific rules to be adhered to by vehicles accessing to construction sites. Proposed management measures will be intended to minimise disruption caused by construction traffic and will be monitored by appointed contractors and enforced where appropriate should non-compliance occur.</p>

PINS Ref	Respondent	
Road Surfaces		
RR-050	Patrick Whittle	<p>Summary of Relevant Representation</p> <p>Project would result in further degradation of road surfaces.</p> <p>Applicant Response</p> <p>Requirement 17 of the dDCO (APP-019) requires the submission of a Construction Traffic Management Plan (CTMP), which will be based on the Framework CTMP (APP-450). Section 7.4 proposes weekly condition surveys with Section 8 including a requirement for highway condition surveys and compliance and monitoring of the carriageway. Additional information regarding the nature of the proposed highway condition surveys and what they shall comprise of is included in paragraph 2.6.8.1 of the Supplementary Transport Assessment (doc ref 7.8.1.11) and Section 7.4 of the Framework CTMP (APP-450-002).</p>
Eastern Road		
RR-010	Elaine Husselby	<p>Summary of Relevant Representation</p> <p>Traffic disruption and congestion on Eastern Road and other roads (and routes to Portsmouth Football Club), including disruption to bus services and deliveries.</p> <p>Applicant Response</p> <p>Part of the A2030 Eastern Road is within the Order Limits. The Applicant anticipates that the proposed works will cause some level of disruption and the impacts of construction along the Eastern Road have been fully assessed within Appendix 22.1 (Transport Assessment) of the ES (APP-448). This document provides results of junction capacity assessments along the cable route itself together with locations impacted by traffic redistribution on the wider network. This shows that whilst there will be an impact at some junctions, this will not be severe and will only be temporary in nature. Appendix 22.1A (Framework Traffic Management Strategy) (FTMS) of the ES (APP-449) sets out an indicative programme to mitigate the impacts of these works where practicable. Both the indicative construction programme and Onshore Cable Corridor have been developed in consultation with Portsmouth City Council to take account of environmental constraints, public events, school terms and public holidays.</p> <p>Chapter 1.13 of the FTMS highlights the limited impact upon sustainable transport networks and Chapter 6.2 of the FTMS highlights that where there are impacts upon bus lanes, temporary bus priority traffic signals will be provided where possible to mitigate the impact on public transport.</p>
RR-013	Martin Farrelly	
RR-014	Andy Parks	
RR-016	Michael Johnson	
RR-022	Louise Baker	
RR-032	Jane Carter	
RR-040	Anne Atkinson	
RR-050	Patrick Whittle	
RR-051	Cynthia Whittle	
RR-079	Clare Ash	
RR-085	Debra Wallace	
RR-119	Julie Grove	
RR-133	Shaun Nightingale	
RR-134	Sheila Roy	
RR-136	Tracy Barker	
RR-138	Trevor David Clifton	
RR-142	Alida Clifton	
RR-143	Alison Gregory	

PINS Ref	Respondent	
RR-147	Anna Carter	
RR-153	Christian Hannam	
RR-169	Ian Perryman	
RR-171	John Townsend	
RR-172	Judith Jewitt	
RR-174	Leonard Sirett	
RR-187	Rosemary Sirett	
RR-196	Timothy Brown	
AS-022	Martin Lock	
RR-172	Judith Jewitt	
RR-159	Cllr Darren Sanders	
RR-177	Cllr Luke Stubbs	
	Template objection letter (see Appendix 2 for list of interested parties)	
Broadway Lane/Day Lane junction		
RR-039	Jeremy Warren	Summary of Relevant Representation
RR-046	Polly Beard	Inadequate plans/proposals for the junction of Broadway Lane/Day Lane and wider Converter Station Area.
RR-029	David Jeffery	
RR-043	APLEAL Action Group	Applicant Response
		<p>A full assessment of the likely impact of the proposals on the highway network is included in Chapter 22 (Traffic and Transport) of the ES (APP-137), with further assessment of the impacts on all road users being provided in Appendix 22.1 (Transport Assessment) of the ES (APP-448) and the Supplementary Transport Assessment (Doc Ref 7.8.1.11f). Mitigation measures to offset identified impacts are included in Appendix 22.2 (the Framework Traffic Management Strategy) (APP-449). The Applicant considers that the mitigation measures set out in that document are sufficiently robust to mitigate the impacts of the proposals in respect to traffic and transport.</p> <p>A Framework Construction Traffic Management Plan (CTMP) (APP-450) has been submitted which sets out the framework for managing construction traffic associated with the Proposed Development. Discussions are ongoing with Hampshire County Council as highways authority regarding the proposed layout at the Broadway Lane/Day Lane junction and wider highway network.</p>
Farlington Avenue		
RR-032	Jane Carter	Summary of Relevant Representation

PINS Ref	Respondent	
		<p>Farlington Avenue is a busy road in and out of the city. If parts of the road are closed, it will have a serious effect on traffic and congestion on other routes.</p> <p>Applicant Response</p> <p>Farlington Avenue falls within the Onshore Cable Corridor and as part of Appendix 22.1A (Framework Traffic Management Strategy (FTMS)) of the ES (APP-449) a strategy has been submitted to ensure that access is maintained throughout the construction works wherever possible.</p>
Eastney		
RR-163	Eastney Community Centre	<p>Summary of Relevant Representation</p> <p>The project will cause traffic chaos in a part of the city where there is just one road on and off the island.</p> <p>Applicant Response</p> <p>Chapter 22 Traffic and Transport of the ES (APP-137) assesses the traffic impacts of the Proposed Development. Eastney is located in Sections 9 and 10. Chapter 22 concludes that there will be a significant effect at Moorings Way but notes that traffic delay per vehicle is low and of a temporary short-term basis. Further as set out in the Transport Assessment (TA) (APP-448), there will not be a significant effect during peak hours at Locksway Road/Longshore Way/Kingsley Road and the entirety of Section 10 (Eastney Landfall). This matter is also set out within the Supplementary Transport Assessment (STA) (Doc Ref 7.8.1.11), at Section 5, where further analysis has been undertaken. Details of the assessments undertaken of highway junctions within the Eastney area are set out below:</p> <ul style="list-style-type: none"> • Moorings Way - Table 175 and 176 of the TA, with further sensitivity tests also included in 5.5.12. of the STA; • Locksway Road / Longshore Way – Table 177 and 178 of the TA, with further sensitivity tests also included in 5.5.13. of the STA; and • Bransbury Road – Table 179 and 180 of the TA and Section 5.5.14 in the STA
Construction Vehicles (Anmore Lane)		
RR-195	Joseph Tee	Summary of Relevant Representation
RR-195	Kathryn Moor	Impact of construction vehicles on Anmore Road and Anmore Lane, along which 24-hour access is required.
RR-195	John Moor	Applicant Response
RR-039	Jeremy Warren	The Applicant anticipates that the proposed works will cause some level of disruption and the Framework Traffic Management Strategy (Appendix 22.1A of the Environmental Statement (ES (APP-449))) sets out a robust package of measures which are sufficient to mitigate the impacts of construction vehicles where practicable.
Lovedean		
RR-029	David Jeffery	Summary of Relevant Representation

PINS Ref	Respondent	
RR-046	Polly Beard	Lovedean is unsuitable for a significant increase in construction traffic.
RR-039	Jeremy Warren	<p>Applicant Response</p> <p>A Framework Construction Traffic Management Plan (CTMP) (APP-450) has been submitted which sets out the framework for managing construction traffic associated with the Proposed Development.</p>
Waterlooville		
RR-050	Patrick Whittle	<p>Summary of Relevant Representation</p> <p>The route from Eastney to Lovedean follows one of the two major roads in and out of Portsmouth, through Waterlooville, without consideration of effects on residents within this densely populated conurbation.</p> <p>Applicant Response</p> <p>The Onshore Cable Corridor has been defined following the consideration of various route options which assessed the environmental impacts (including those of residents) as defined in ES Chapter 2 Consideration of Alternatives (APP-117).</p> <p>The Applicant anticipates that the proposed works will cause some level of disruption and the impacts of construction have been fully assessed within the Transport Assessment (APP-448).</p> <p>The Framework Traffic Management Strategy (APP-449) sets out a programme to mitigate the impacts of these works where practicable, which are temporary in nature, with the final cable route avoiding highways as much as practicable.</p>
Landfall		
RR-016	Michael Johnson	Summary of Relevant Representation
RR-153	Christian Hannam	Landfall location will have detrimental traffic impacts on one of Portsmouth's main routes.
RR-125	Paul Wright	<p>Applicant Response</p> <p>Traffic impacts have been fully assessed within the Transport Assessment (APP-448) and the Supplementary Transport Assessment (Doc-Ref 7.8.1.11).</p>
Fort Cumberland Road /Henderson Road		
RR-156	Cllr Matthew Winnington	Summary of Relevant Representation
RR-177	Cllr Luke Stubbs	Significant disruption to Fort Cumberland Road/ Henderson Road and impact on residential amenity.
		Applicant Response

PINS Ref	Respondent	
	<p>Template objection letter (see Appendix 2 for list of interested parties)</p>	<p>Appendix 22.1A (Framework Traffic Management Strategy (FTMS)) of the ES (APP-449) sets out a programme to mitigate the impacts (including on residential amenity) of these works where practicable, which are temporary in nature, with the final cable route avoiding highways as much as practicable.</p> <p>Full details of the strategy for providing access and communication to residents is included in the Onshore Cable Route Construction Impacts on Access to Properties and Car Parking and Communication Strategy included as Appendix 1 of the FTMS. The FTMS (APP-449) submitted alongside this response.</p>
New Housing		
<p>RR-146 RR-051</p>	<p>Angela Herring Cynthia Whittle</p>	<p>Summary of Relevant Representation</p> <p>New housing in Denmead, Drayton and Horndean will result in increased traffic.</p> <p>Applicant Response</p> <p>The Applicant has assessed committed developments as part of its Solent sub-Regional Transport Model modelling which is set out in Section 2.3 of the Appendix B STRM Coding Note, which forms part of ES Appendix 22.1 Transport Assessment (APP-448). The Assessment concludes in table 61 that there is sufficient available capacity on the highway network in this area.</p> <p>The assessment undertaken using the SRTM includes a 2026 future year scenario including allowances for future residential growth. This is considered a robust assessment as, at present, the programming of the works is forecast to be completed prior to this future year, and thus any committed developments are likely to have been built out to a lesser degree than assumed within the traffic modelling, which would lead to lower levels of traffic generation. As the traffic modelling allows for higher levels of committed residential development than are likely to have come to fruition by the time of the delivery of the works, this confirms that a robust assessment has been undertaken.</p>
A3		
<p>RR-170</p>	<p>Jan Leonard</p>	<p>Summary of Relevant Representation</p> <p>Concerns about HGVs coming off A3M at Jct 2 and down the old A3 to Lovedean Lane.</p> <p>Impact on traffic on the busy A3 even outside rush hour. Traffic should be split between Jct 2 and Jct 3 to spread these challenges.</p> <p>Applicant Response</p> <p>The Applicant anticipates that the proposed works will cause some level of disruption and the impacts of construction have been fully assessed within the Transport Assessment (Appendix 22.1A of the ES (APP-448)).</p> <p>The Framework Traffic Management Strategy (Appendix 22.1A) sets out a programme to mitigate the impacts of these works where practicable. Proposed construction traffic routes have been subject to suitability assessments where required, for example on the narrow sections of Lovedean Lane and Day Lane, where it has been concluded that the use of STOP/GO boards will be required to facilitate the movements of HGVs on Day Lane, and as such, these measures have been proposed. This assessment can be seen in Section 2.4 of the Supplementary Transport Assessment (new doc ref). As is set out in the updated FCTMP (new doc ref), mitigation is also in place to reduce the impact of HGV movement, through timing restrictions of HGV movements to and from the Converter Station to avoid of peak hours.</p>

PINS Ref	Respondent	
Converter Station		
RR-038	Susan Crossley	Summary of Relevant Representation
RR-146	Angela Herring	Construction of the converter station will have a detrimental impact on local infrastructure (highway) and disrupt traffic on local B roads.
RR-149	Bernard Johnson	
RR-043	APLEAL Action Group	Applicant Response
		The Applicant anticipates that the proposed works will cause some level of disruption. The Framework Construction Traffic Management Plan (APP-450) provides the strategy for mitigating impacts on the local transport networks caused by construction vehicles, with detailed CTMP's which accord with this required to be submitted and approved and thereafter complied with in relation to all elements of the Proposed Development in accordance with dDCO Requirement 17.
Timescale		
RR-140	Victoria Campbell	Summary of Relevant Representation
RR-032	Jane Carter	Long duration of construction traffic effects on roads.
RR-150	Bruce Graham	Applicant Response
		The Applicant anticipates that the proposed works will cause some level of disruption and the impacts of construction have been fully assessed within the Transport Assessment (Appendix 22.1 of the ES) (APP-448). The Framework Traffic Management Strategy (Appendix 22.1A of the ES (APP-449) sets out a programme to mitigate the impacts of these works where practicable, which are temporary in nature, with the final cable route avoiding highways as much as practicable.
Mitigation		
	Template objection letter (see Appendix 2 for list of interested parties)	Summary of Relevant Representation
		No highway mitigation has been suggested
		Applicant Response
		Requirements 17 and the proposed protective provisions for the protection of highways and traffic within the dDCO (APP-019) require the submission and approval of a Construction Traffic Management Plan (CTMP) and a Traffic Management Strategy which will be based on the Framework CTMP (APP-450) and the Framework Traffic Management Strategy (APP-449) respectively.
PRoW		
RR-043	APLEAL Action Group	Summary of Relevant Representation
		Concerns on loss of amenity on users of footpaths and roads in the vicinity of the Converter Station.

PINS Ref	Respondent	
		<p>Applicant Response</p> <p>Chapter 25 (Socio-economics) of the ES (APP-140) cross-refers to Chapter 15 (Landscape and Visual) of the ES (APP-130) for effects on amenity for recreation, including Public Rights of Way (PRoW) (paragraphs 25.7.3.3 – 25.7.3.7). PRoW 4 is the only route affected throughout construction as it is adjacent to the southern edge of the Proposed Development and a temporary diversion will be provided.</p> <p>Appendix 14 of the ES Addendum ‘Note on PRoW, Long Distance Walking Paths and Cycle Route Diversions’ containing information on all PRoW (document reference 7.8.1.14) has been produced and submitted with this document.</p>
Other		
RR-118	Judith Webberley	<p>Summary of Relevant Representation</p> <p>There is an Access Point shown on a drawing, which does not exist. It is on Figure 15.49 Indicative Landscape Mitigation Plan Option B(i) south (Environmental Statement – Volume 2). The access point is shown in Broadway Lane (south) approx. 15m from its junction with Edney’s Lane/Old Mill Lane.</p> <p>Applicant Response</p> <p>Figure 15.49 is based on Ordnance Survey data and site visits, with the access point referred to comprising the new vehicular access point proposed to service the Converter Station Area.</p>

5.2. ENVIRONMENT

PINS Ref	Respondent	Summary of Relevant Representation
General		
RR-001 RR-130 RR-048 RR-058 RR-092 RR-097 RR-106 RR-110 RR-117 RR-121 RR-144 RR-153 RR-166	Irene Jay Richard Rogers Judith Ann Clementson Tracey Bottrell Graham O’Neil Ian Daye Kirstin Knowlson-Clark Louisa Newport KE Sikora Neil Hawkins Amanda Whiteland-Smith Christian Hannam Hannah Payne-Cook	<p>Summary of Relevant Representation</p> <p>Concerns that the Proposed Development may lead to significant environmental effects in relation to the following topics:</p> <ul style="list-style-type: none"> • Traffic and Transport; • Air Quality; • Noise and Vibration; • Landscape and Visual; • Heritage and Archaeology; • Ecology (with Arboriculture); • Socio-economics; • Water Resources and Flood Risk; • Ground Conditions; • Carbon and Climate Change;

PINS Ref	Respondent	Summary of Relevant Representation
RR-079 RR-128 RR-117 RR-132	Clare Ash Rachel James Scott Toman Template objection letter (see Appendix 2 for list of interested parties)	<ul style="list-style-type: none"> • Human Health; • Soils and Land Use; • Electric and Magnetic Fields; and • Waste and Material Resources.
		<p>Applicant Response</p> <p>The Applicant has undertaken an Environmental Impact Assessment (EIA) of the Proposed Development to consider and assess the likely significant effects of the Proposed Development. The Environmental Statement (ES) and ES Addendum (document reference 7.8.1) report the findings of the EIA.</p> <p>The ES and ES Addendum also provide information about the Proposed Development including its context, a full description of the Proposed Development and its construction, the main alternatives considered, the consultation process that was part of the EIA, and any relevant technical information that has been used to assess the likely significant effects of the Proposed Development. The ES and ES Addendum include a series of chapters that consider and assess the likely significant effects of the Proposed Development in relation to each relevant environmental topic. These include the following topic chapters:</p> <ul style="list-style-type: none"> • Landscape and Visual Amenity - Chapter 15 of the ES (APP-130) and Chapter 9 of the ES Addendum • Onshore Ecology - Chapter 16 of the ES (APP-131) and Chapter 10 of the ES Addendum • Soils and Agricultural Land Use - Chapter 17 of the ES (APP-132) • Ground Conditions - Chapter 18 of the ES (APP-133) and Chapter 11 of the ES Addendum • Groundwater - Chapter 19 of the ES (APP-134) and Chapter 12 of the ES Addendum • Surface Water Resources and Flood Risk - Chapter 20 of the ES (APP-135) and Chapter 13 of the ES Addendum • Heritage and Archaeology Chapter 21 of the ES (APP-136) and Chapter 14 of the ES Addendum • Traffic and Transport - Chapter 22 of the ES (APP-137) and Chapter 15 of the ES Addendum • Air Quality - Chapter 23 of the ES (APP-138) and Chapter 16 of the ES Addendum • Noise and Vibration - Chapter 24 of the ES (APP-139) and Chapter 17 of the ES Addendum • Socio-economics - Chapter 25 of the ES (APP-140) and Chapter 18 of the ES Addendum • Human Health - Chapter 26 of the ES (APP-141) and Chapter 19 of the ES Addendum • Waste and Material Resources - Chapter 27 of the ES (APP-142) • Carbon and Climate Change - Chapter 28 of the ES (APP-143) <p>In addition, the Applicant has submitted a Non-Technical Summary of the ES (APP-487) and Non-Technical Summary Addendum (APP-487 Rev002), which provides a summary of the findings of the ES in non-technical language.</p>

5.3. ECOLOGY

PINS Ref	Respondent	Summary of Relevant Representation
General		
RR-001	Irene Jay	Summary of Relevant Representation
RR-084	Deborah Cutler	Concern about the impact on ecology / wildlife.
RR-087	Ed Waller	
RR-088	Elizabeth Doyle	Applicant Response
RR-108	Lois Marshall	Potential impacts on marine ecology and the marine environment as a result of the Proposed Development have been fully assessed in Chapters 6 – 14 of the ES submitted with the Application (APP-121-129). In addition, impacts on marine protected areas have been assessed in the Habitats Regulations Assessment Report (HRA) (APP-491) and Appendix 8.5 (Marine Conservation Zone Assessment) of the ES (APP-381) also submitted as part of the Application. The ES assessments undertaken have concluded that no significant effects on marine ecology or the marine environment are likely to occur as a result of the Proposed Development alone or with other relevant projects or plans. Similarly, the HRA concludes that there will be no adverse effect to any of the marine protected sites assessed.
RR-119	Julie Grove	
RR-126	Peter Handley	
RR-166	Hannah Payne-Cook	
RR-078	Christopher Jones	
AS-021	Karen Griffiths	Chapter 16 (Onshore Ecology) of the ES (APP-131) assesses impacts on onshore biodiversity features including statutory and non-statutory designated sites. It includes an assessment of impacts on Langstone Harbour Site of Special Scientific Interest (SSSI), Chichester and Langstone Harbours Special Protection Area (SPA) and Farlington Marshes Site of Importance for Nature Conservation (SINC). Chapter 16 (Onshore Ecology) concludes that following implementation of mitigation there are no likely significant effects on biodiversity. Furthermore, the HRA (APP-491) assesses impacts on European designated sites including Special Protection Areas (SPAs) and Special Areas for Conservation (SACs). The HRA concludes that there are no adverse effects on site integrity from the Proposed Development.
RR-186	Rachel Dawson	
RR-159	CIlr Darren Sanders	
RR-106	Kirstin Knowlson-Clark	
RR-048	Judith Ann Clementson	Updates to Chapter 16 (Onshore Ecology) are provided in the ES Addendum (document reference 7.8.1) including impacts Chichester and Langstone Harbours SPA. The HRA has also been subject to an update (APP-491 Rev002) including the assessment of Ramsar sites and additional information in the assessment of Chichester and Langstone Harbours SPA and Portsmouth Harbour SPA which again concludes that there would be no adverse effects on site integrity as a result of the Proposed Development.
RR-080	Dan Brookes	
RR-083	Dawn Gilbert	
RR-104	Kelly Martin	
RR-140	Victoria Campbell	
RR-153	Christian Hannam	
RR-146	Angela Herring	
RR-172	Judith Jewitt	
RR-113	Lynsey Christopher	
RR-123	Pam Wilkie	
RR-169	Ian Perryman	
RR-072	Vienna Crimes	

PINS Ref	Respondent	Summary of Relevant Representation
RR-075	Annette Sartori	
RR-078	Christopher Jones	
RR-159	Cllr Darren Sanders	
RR-034	Alistair Thompson Template objection letter (see Appendix 2 for list of interested parties)	
Nature Reserves and Brent Geese		
RR-034	Alistair Thompson	Summary of Relevant Representation
RR-172	Judith Jewitt	Disruption to nature reserves, flora and fauna (birds and sealife) including a detrimental impact on Brent Geese and mussels/sea life.
RR-075	Annette Sartori	Applicant Response
RR-113	Lynsey Christopher	
RR-153	Christian Hannam	
RR-169	Ian Perryman	
AS-021	Karen Griffiths	
		<p>Potential impacts on marine ecology and the marine environment as a result of the Proposed Development have been assessed in Chapters 6 – 14 of the ES submitted with the Application (APP-121 – 129). The assessments undertaken have concluded that no significant effects on marine ecology or the marine environment will occur as a result of the Proposed Development.</p> <p>Mussels/Sea Life - Potential impacts on marine ecology and the marine environment as a result of the Proposed Development have been assessed in Chapters 6 – 14 of the ES (APP-121 – 129). In addition, impacts to marine protected areas have been fully assessed in the HRA (APP-491) and Appendix 8.5 (Marine Conservation Zone Assessment) of the ES (APP-381). The ES assessments undertaken have concluded that no significant effects on marine ecology or the marine environment will occur as a result of the Proposed Development alone or with other relevant projects or plans. Similarly, the HRA concludes that there will be no adverse effect to any of the marine protected sites assessed.</p> <p>The above marine assessments have been developed in consultation with the relevant regulatory and advisory bodies including the Marine Management Organisation (MMO), Centre for Environment, Fisheries and Aquaculture Science, Natural England, Joint Nature Conservation Committee and the EA.</p> <p>Chapter 16 (Onshore Ecology) of the ES (APP-131) assesses impacts on biodiversity features. Chapter 16 concludes that following implementation of mitigation there will be no significant effects on biodiversity. Updates to Chapter 16 (Onshore Ecology) are provided in the ES Addendum (document reference 7.8.1) including impacts Chichester and Langstone Harbours SPA.</p> <p>With regards to Solent Waders and Brent Geese - Chapter 16 (Onshore Ecology) of the ES (APP-131) assesses impacts on biodiversity features including statutory and non-statutory designated sites. Furthermore, the HRA (APP-491) assesses impacts on European designated</p>

PINS Ref	Respondent	Summary of Relevant Representation
		<p>sites including Special Protection Areas (SPAs) and Special Areas for Conservation (SACs). Both Chapter 16 of the ES and the HRA are supported and informed by Appendix 16.14 (Winter Working Restriction for Features of Chichester & Langstone Harbours SPA) of the ES (APP-422) which addresses impacts on bird features of Chichester and Langstone Harbours SPA and Solent Wader and Brent Goose Strategy ('SWBGS') sites which are considered functionally linked to the SPA. The principles outlined in Appendix 16.14 have been subject to updates following consultation with Natural England and are presented in the ES Addendum (document reference 7.8.1) and the note Construction Noise Impacts on SWBGS Sites (document reference 7.8.1.18). The principles are formulated in order to avoid impacts on SPA features including brent geese.</p> <p>The HRA has also been subject to an update (APP-491 Rev002) including the assessment of Ramsar sites and additional information in the assessment of Chichester and Langstone Harbours SPA and Portsmouth Harbour SPA which again concludes that there would be no adverse effects on site integrity as a result of the Proposed Development.</p>
Slow Worms		
RR-034	Alistair Thompson	<p>Summary of Relevant Representation</p> <p>Considerable concern around the environmental damage the project will cause to areas used by slow worms.</p> <p>Applicant Response</p> <p>Surveys for reptiles have been carried out at the proposed location of the Converter Station Area where potential habitat for reptiles was identified. No reptiles were recorded in the surveys as outlined in Appendix 16.10 (Reptile Survey Report) of the ES (APP-418). Despite the absence of reptiles recorded at the Converter Station and limited suitable habitat within the Cable Route, Precautionary Methods of Working are detailed to minimise impacts on reptiles, including slow worm, during construction in the updated Outline Landscape and Biodiversity Strategy (OLBS) (APP-506 Rev002) which will be implemented as part of construction of the Proposed Development and secured in Requirement 9 (Biodiversity Management Plan) of the draft DCO (APP-019).</p>
Langstone Harbour and Farlington Marshes		
RR-106	Kirstin Knowlson-Clark	Summary of Relevant Representation
RR-119	Julie Grove	The Project will have an impact on many different species and plant life at Langstone Harbour.
RR-135	Sylvia Holdforth	Applicant Response
RR-056	Pam Wilkie	
RR-123	Cllr Darren Sanders	
RR-159	Andrew Rowley	The potential impacts to marine ecology and the marine environment, including Langstone Harbour, have been assessed in in Chapters 6 – 14 of the ES submitted with the Application (APP-121 to 129). These assessments have concluded that there will be no significant effects to marine ecology or the marine environment as a result of the Proposed Development.

PINS Ref	Respondent	Summary of Relevant Representation
<p>RR-111</p> <p>RR-140</p>	<p>Lynn Mills</p> <p>Victoria Campbell</p> <p>Template objection letter (see Appendix 2 for list of interested parties)</p>	<p>Chapter 16 (Onshore Ecology) of the ES (APP-131) assesses impacts on biodiversity features including statutory and non-statutory designated sites. It includes an assessment of impacts on Langstone Harbour Site of Special Scientific Interest (SSSI), Chichester and Langstone Harbour Special Protection Area (SPA) and Farlington Marshes Site of Importance for Nature Conservation (SINC). Chapter 16 concludes that following implementation of mitigation there are no likely significant effects on biodiversity.</p> <p>The Habitats Regulation Assessment (HRA) (APP-491) submitted with the Application assesses impacts on European designated sites including SPAs and Special Areas of Conservation (SACs). It covers Chichester and Langstone Harbours SPA. The HRA concludes that there are no adverse effects on site integrity from the Proposed Development.</p> <p>The Applicant can confirm that the Order Limits of the Proposed Development do not include Farlington Marshes. The above response on Langstone Harbour and the designated sites it supports confirms these will not be disturbed.</p>
<p>Solent</p>		
<p>RR-050</p> <p>RR-034</p> <p>AS-021</p>	<p>Patrick Whittle</p> <p>Alistair Thompson</p> <p>Karen Griffiths</p> <p>Template objection letter (see Appendix 2 for list of interested parties)</p>	<p>Summary of Relevant Representation</p> <p>Laying cables would significantly disturb the Solent Marine Conservation Zone which is designated to preserve rare and threatened habitats and marine species (including seals and mussels).</p> <p>Applicant Response</p> <p>An assessment has been undertaken to investigate any potential adverse effects on Marine Conservation Zones or European designated sites such as Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites.</p> <p>Potential impacts on marine ecology and marine protected areas as a result of the Proposed Development have been fully assessed in the Habitats Regulations Assessment (HRA) (APP-491) and Appendix 8.5 (Marine Conservation Zone (MCZ) Assessment) of the ES (APP-381) submitted as part of the Application. These assessments concluded that the Proposed Development will not result in any adverse effects on the marine protected areas in the vicinity, including the Solent Maritime Special Area of Conservation (SAC). The HRA and MCZ assessments and their conclusions have been consulted on with the relevant statutory nature conservation bodies.</p> <p>Potential impacts on fish species in the area have been assessed in Chapter 9 (Fish and Shellfish) of the ES (APP-124). The HRA and MCZ assessment also assess potential impacts on marine protected areas whose qualifying features include fish species. The chapter assessment concluded that the Proposed Development will not result in any significant effects to fish species in the area and the HRA and MCZ assessments concluded that no protected fish features would be adversely affected by the Proposed Development. The assessments and their conclusions have been consulted on with relevant regulatory and advisory bodies such as the Marine Management Organisation (MMO), Centre for Environment, Fisheries and Aquaculture Science, Natural England, and the EA who advised on impacts on migratory fish species in the vicinity of the works. The assessments were also informed through extensive engagement with local commercial fishermen and anglers as well as organisations such as the Southern and Sussex IFCA's and the National Federation of Fishermen's Organisations.</p> <p>Potential impacts on seals as a result of the Proposed Development have been assessed in Chapter 10 (Marine Mammals and Basking Sharks) of the ES (APP-125). This assessment concluded that the Proposed Development will not result in any significant effects on marine mammal species in the area, including seals. Furthermore, the HRA investigated the potential impacts resulting from the Proposed Development on marine mammals (including seals) and concluded that there would not be any adverse effects on marine mammals that are features of marine protected areas.</p>

PINS Ref	Respondent	Summary of Relevant Representation
Milton Common, Bransbury Park and other open space		
RR-053	Hannah West	Summary of Relevant Representation
RR-059	Alison Bee	Disruption to / destruction of Milton Common, Bransbury Park and other open space, including wildlife and public access.
RR-119	Julie Grove	
RR-123	Pam Wilkie	Applicant Response
RR-184	Peter Hicks	Chapter 16 (Onshore Ecology) of the ES (APP-131) assesses impacts on biodiversity features including statutory and non-statutory designated sites and considers impacts on Milton Common. Chapter 16 (Onshore Ecology) concludes that following implementation of mitigation there will be no significant effects on biodiversity.
RR-106	Kirstin Knowlson-Clark	
RR-121	Neil Hawkins	Chapter 25 (Socio-economics) of the ES (APP-140) assesses the temporary impact upon recreational use of Milton Common. It concludes that after mitigation the effect would be minor to moderate (not significant).
RR-147	Anna Carter	
	Template objection letter (see Appendix 2 for list of interested parties)	In assessing the temporary impact upon recreational use of Bransbury Park, it concludes that after mitigation the effect would be moderate (significant), this is also the case for Farlington Fields. For other recreational space post mitigation the recreational use would not be significantly affected.
Allotments		
RR-111	Lynn Mills	Summary of Relevant Representation
RR-119	Julie Grove	Disruption to allotments, including impacts on wildlife.
RR-123	Pam Wilkie	
	Template objection letter (see Appendix 2 for list of interested parties)	Applicant Response
		Whilst the Eastney and Milton Allotments are included within the Order Limits, the Proposed Development will install the cable using Horizontal Directional Drilling (HDD), and as such there will be no disruption to the allotments.
		Chapter 16 (Onshore Ecology) of the ES (APP-131) assesses impacts on biodiversity features including statutory and non-statutory designated sites. Chapter 16 concludes that following implementation of mitigation there will be no likely significant effects on biodiversity.
Eastney Foreshore		
RR-102	Keith Baker	Summary of Relevant Representation
RR-184	Peter Hicks	Adverse effect on Eastney foreshore and the wildlife of the shore and adjacent marsh land, and the wildlife of that area.

PINS Ref	Respondent	Summary of Relevant Representation
		<p>Whilst the foreshore at Eastney is included within the Order Limits, the Proposed Development will install the cable in this location using HDD, and as such there will be no disruption to the foreshore or associated ecology.</p> <p>Chapter 16 (Onshore Ecology) of the ES (APP-131) assesses impacts on biodiversity features. Chapter 16 concludes that following implementation of mitigation, including Section 10 of the Onshore Cable Corridor, there will be no likely significant effects on biodiversity.</p>
Trees		
RR-195	Joseph Tee Kathryn Moore John Moore	<p>Summary of Relevant Representation</p>
		Removal of a large oak tree in roadside boundary. Tree and surrounding hedge provide a visual screen from the highway and wildlife habitats.
		Applicant Response
		<p>The Arboriculture Report (Appendix 16.3 of the ES (APP-411)) describes the baseline arboricultural information and assesses the potential direct and indirect impacts of the Proposed Development.</p> <p>Chapter 16 (Onshore Ecology) of the ES (APP-131) assesses impacts on biodiversity features and concludes that following implementation of mitigation there are will be no likely significant effects on biodiversity.</p>
Cable Heat		
RR-157	Cllr Jacqueline Porter	<p>Summary of Relevant Representation</p> <p>Concern over the impact of the heat of the outer side of the cable on the ecology at both ground and below ground level.</p> <p>Applicant Response</p> <p>HVDC cables generate heat during operation and it is caused by energy losses in the underground cables because they are typically not 100% efficient (APP-118) (APP-359) (APP-361). All electrical cables generate heat, however the Proposed Development has HVDC cables, which generate less losses than traditional AC cables that carry significantly lighter loads – some of which are already installed in the vicinity of the proposed Order Limits.</p> <p>The Applicant’s technical advisors note Traditional AC cables have two types of losses that generate heat: Dielectric losses and sheath losses. The dielectric losses are naturally created by the insulating material and the sheath losses are created by induced voltage and currents in the cable’s metallic screen. HVDC cables do not have either of these losses and therefore generate significantly less heat that traditional AC cables of a smaller size, making them ideal for underground cables for interconnector projects.</p> <p>In addition, HVDC cables have been extensively modelled for different seasonal and environmental conditions, a typical calculated increase in temperature at ground level is in the order of 2-3°C therefore having negligible effect on the environment. As for clay or other ground drying out, the installation is designed specifically to prevent this from occurring as dried-out ground presents a significantly greater thermal</p>

PINS Ref	Respondent	Summary of Relevant Representation
		resistance which makes the system less efficient and increases losses. Accordingly, cables are installed in ducts (plastic pipes) that offer good thermal properties at higher temperatures. The cross-section of the ducts is designed such that the temperature outside of the surrounding material does not dry out surrounding clay or other ground.

5.4. OPEN SPACE

PINS Ref	Respondent	Summary of Relevant Representation
General		
RR-061	Ingie Porteous	Summary of Relevant Representation
RR-147	Anna Carter	Damage to and/or the loss of green, community, open spaces – including parks, allotments, beaches, nature reserves and common land.
RR-072	Vienna Crimes	
RR-123	Pam Wilkie	Applicant Response
RR-136	Tracy Barker	Chapter 25 (Socio-economics) of the ES (APP-140) assesses the impact upon recreational space. Paragraph 25.7.2.1 sets out mitigation embedded in the design which includes use of HDD to avoid Milton Locks Nature Reserve, Milton Allotments, Eastney Beach; in addition to routing the cable to avoid two of the cricket squares in Farlington Fields, Baffins Milton Rovers' main football pitch and Bransbury Park football pitch and skate park. Table 25.14 of Chapter 25 (Socio-economics) sets out impacts on areas of open space and leisure facilities. The table sets out whether the impact is direct or indirect and the duration of the impact. All impacts are temporary. Impacts assessed in Table 25.15 of Chapter 25 (Socio-economics) range from negligible or none (not significant) to moderate (significant). A Recreational Strategy (Doc Ref 7.8.1.13) which is to be submitted to the Examination alongside this document has been developed to set out how the loss of open space can be further mitigated, including consideration of how cable route and working areas can reduce effects on pitches.
RR-153	Christian Hannam	
RR-053	Hannah West	
RR-084	Deborah Cutler	
RR-099	James Baker	
RR-107	Linda Williams	
RR-111	Lynn Mills	
RR-119	Julie Grove	
RR-121	Neil Hawkins	
RR-134	Sheila Roy	
RR-143	Alison Gregory	
RR-189	Sally Englefield	
RR-034	Alistair Thompson	
RR-079	Clare Ash	
RR-088	Elizabeth Doyle	
RR-187	Rosemary Sirett	
RR-106	Kirstin Knowlson-Clarkson	

PINS Ref	Respondent	Summary of Relevant Representation
	Template objection letter (see Appendix 2 for list of interested parties)	
Milton Common		
RR-053	Hannah West	Summary of Relevant Representation
RR-059	Alison Bee	Concern about impact to Milton Common.
RR-106	Kirstin Knowlson-Clark	
RR-134	Shelia Roy	Applicant Response
RR-140	Victoria Campbell	Chapter 25 (Socio-economics) of the ES (APP-140) assesses the impact upon Milton Common and finds a moderate adverse effect on users of the common, and that the following mitigation would reduce this to a minor to moderate adverse effect:
RR-159	Cllr Darren Sanders	
RR-184	Peter Hicks	<ul style="list-style-type: none"> • Consultation with affected users and local authority; • Restoration of recreational and open space and car parks; and
RR-090	Georgina Butt	<ul style="list-style-type: none"> • Contractor review of construction programme and working areas.
Bransbury Park		
RR-053	Hannah West	Summary of Relevant Representation
RR-042	Veronica Knight	Concern about impact on Bransbury Park.
RR-136	Tracy Barker	
RR-143	Alison Gregory	Applicant Response
RR-079	Clare Ash	Chapter 25 (Socio-economics) of the ES (APP-140) assesses the impact upon Bransbury Park and finds a major to moderate adverse effect on users of the park, and that the following mitigation would reduce this to a minor to moderate adverse effect:
RR-156	Cllr Matthew Winnington	
RR-107	Linda Williams	<ul style="list-style-type: none"> • Consultation with affected users and local authority; • Restoration of recreational and open space and car parks; and • Contractor review of construction programme and working areas.
Skate Park		
RR-113	Lynsey Christopher	Summary of Relevant Representation
RR-123	Pam Wilkie	Proposal would damage / destroy Skate Park which provides a valuable facility for young people. Will it be replaced?
		Applicant Response

PINS Ref	Respondent	Summary of Relevant Representation
		The Onshore Cable Corridor runs to the west of the skate park (para 3.6.4.48 of Chapter 25 (Socio-economics) of the ES (APP-140)) and has been designed to avoid this facility (para 25.7.2.1).
Allotments		
RR-079	Clare Ash	Summary of Relevant Representation
RR-104	Kelly Martin	Concern that route will have detrimental impact on allotments, including that allotment owners will lose years of hard work.
RR-113	Lynsey Christopher	Applicant Response
RR-123	Pam Wilkie	
RR-136	Tracey Barker	The cable route will pass under the Eastney and Milton Allotments via a Horizontal Directional Drill (HDD) to avoid direct impact (paragraph 3.6.4.46 of Chapter 3 (Description of the Proposed Development) of the ES (APP-118)). Para 3.6.4.47 of Chapter 3 states: “ <i>Whilst the HDD will take place under the Eastney and Milton Allotments, access will be required over the paths within the Allotments during installation works for monitoring purposes.</i> ”
RR-143	Alison Gregory	
RR-042	Veronica Knight	No impact is predicted on Milton and Eastney Allotments (Table 25.14 and Table 25.15 of Chapter 25 (Socio-economics) of the ES (APP-140)).
Health Impacts		
RR-152	Chris Seaton Template objection letter (see Appendix 2 for list of interested parties)	Summary of Relevant Representation Concern about the damage the project will have on health through loss of playing fields. Applicant Response Chapter 26 (Human Health) of the ES (APP-140) assesses the impact upon human health. Temporary minor adverse impacts on human health have been identified during the construction stage due to the temporary landtake of green space, including playing fields, and the assessment concludes that the overall effect on human health due to these temporary changes is not significant. The Onshore Cable Corridor will not result in the permanent loss of recreational and open space areas.

PINS Ref	Respondent	Summary of Relevant Representation
Mitigation		
RR-042	Veronica Knight Template objection letter (see Appendix 2 for list of interested parties)	<p>Summary of Relevant Representation</p> <p>Seems to be no mitigation for residents especially for their open, green and community spaces that will be lost to them for the duration of construction work.</p> <p>Applicant Response</p> <p>Paragraph 25.7.2.1 of Chapter 25 (Socio-economics) of the ES (APP-140) sets out mitigation embedded in the design which includes use of HDD to avoid Milton Locks Nature Reserve, Milton Allotments, Eastney Beach; in addition to routing the cable to avoid two of the cricket squares in Farlington Fields, Baffins Milton Rovers' main football pitch and Bransbury Park football pitch and skate park.</p> <p>Table 25.14 of Chapter 25 (Socio-economics) sets out impacts on areas of open space and leisure facilities. The table sets out whether the impact is direct or indirect and the duration of the impact. All impacts are temporary. Impacts assessed in Table 25.15 of Chapter 25 (Socio-economics) range from negligible or none (not significant) to moderate (significant).</p> <p>A Recreation Strategy (doc ref 7.8.1.13) has been developed and submitted to the Examination alongside this response which sets out how the contractor can further mitigate for loss of open space, including consideration of how cable route and working areas can reduce effects on pitches.</p>
The Baffins		
RR-090	Georgina Butt	<p>Summary of Relevant Representation</p> <p>Concern regarding the proposal to route through The Baffins.</p> <p>Applicant Response</p> <p>Chapter 25 (Socio-economics) of the ES (APP-140) assesses the temporary impact upon The Baffins and finds a moderate adverse effect on users of Baffins Milton Rovers Football Ground and associated sports ground and that the following mitigation relevant to this site would reduce this to a minor to moderate adverse effect:</p> <ul style="list-style-type: none"> • Consultation with affected users; • Restoration of recreational and open space and car parks; and • Contractor review of construction programme and working areas.

5.5. AIR QUALITY

PINS Ref	Respondent	
General		
RR-072	Vienna Crimes	<p>Summary of Relevant Representation</p> <p>Concern over impact of the Proposed Development on air quality /air pollution.</p> <p>Applicant Response</p> <p>Chapter 23 (Air Quality) of the ES (APP-138 Rev002) provides a comprehensive approach to the assessment of the impacts to air quality resulting from the Proposed Development. This includes the assessment of air emissions during construction and operation of the Proposed Development.</p> <p>The construction stage assessment includes fugitive emissions from the construction site, generated construction traffic, non-construction traffic (road closures and diversions) and power generation required to complete construction operations. The assessment includes detailed air quality modelling on a detailed assessment of the traffic impacts. The operational stage assessment covers power generation emissions from the ORS building back-up generators at the Eastney Landfall and the Converter Station.</p> <p>Construction stage impacts will be temporary and changes in air pollutant concentrations are predicted to be negligible and imperceptible to humans in most of the study area. The majority of people are predicted to experience no change in pollutant concentrations, however, there is some variation across the study area which is summarised as follows:</p> <ul style="list-style-type: none"> • Construction Site Activities are predicted to be of high risk driven by the magnitude of the works and number of potential exposures in each section. However, these effects will be temporary and transient and with the implementation of appropriate mitigation for each Section, the impacts during the Construction Stage will be negligible. • Generated Construction Traffic has potential to cause changes in local air quality which can impact high sensitivity receptors along the entire construction route. However, more improvements in pollutant concentrations than deteriorations are predicted, and no new objective exceedances are likely. • Non-Construction Related Traffic also has the potential to cause changes in local air quality which can impact high sensitivity receptors along the entire construction route. However, most of the changes predicted are of a low magnitude and impacts range from negligible adverse to moderate beneficial along the route. No new exceedances of the air quality objectives that already exist are predicted to be produced. • Construction Stage Local Power Generation emissions associated with onshore cable laying activities are predicted to produce negligible and moderate local air quality impacts in a small part of the study area. However, the maximum annual average concentrations will be under half of the health-based objective and exceedances of the short-term objectives are highly unlikely. • Operational Stage Local Power Generation emissions from the ORS building back-up generators at the Eastney Landfall and the Converter Station back-up generators will be negligible adverse with the implementation of embedded mitigation.
RR-099	James Baker	
RR-119	Julie Grove	
RR-121	Neil Hawkins	
RR-170	Jan Leonard	
RR-106	Kirstin Knowlson-Clark	
RR-107	Linda Williams	
RR-013	Martin Farrelly	
RR-046	Polly Beard	
RR-032	Jane Carter	
RR-061	Ingie Porteous	
RR-072	Vienna Crimes	
RR-139	Trudy Farley	
RR-140	Victoria Campbell	
RR-143	Alison Gregory	
RR-158	Dana Bubenickova	
RR-187	Rosemary Sirett	
RR-166	Hannah Payne-Cook	
RR-116	Michelle Juchau	
RR-163	Eastney Community Centre Template objection letter (see Appendix 2 for list of interested parties)	
RR-159	Cllr Darren Sanders	<p>Summary of Relevant Representation</p> <p>Government insisting that Portsmouth cut air pollution, while at the same time allowing a scheme that will increase it.</p> <p>Applicant Response</p>

PINS Ref	Respondent	
		<p>Areas where concentrations are predicted to increase have been identified in Chapter 23 (Air Quality) of the ES (APP-138 Rev002). These are a small minority compared to those predicted to experience either no change in concentrations, or indeed those that are predicted to benefit from a reduction in concentrations during construction.</p> <p>The impacts upon each of the AQMAs in Portsmouth has been identified. A precautionary approach was taken in the description of effects based on the number of properties affected and the highest level of impact, and these range from slight adverse effects to slight beneficial effects. Inherent within these predictions is the fact that these impacts are based on a worst-case traffic scenario and will only be temporary and transient in nature as works progress.</p>
<p>RR-079 RR-111 RR-187</p>	<p>Clare Ash Lynn Mills Rosemary Sirett</p>	<p>Summary of Relevant Representation</p> <p>Disruption to Eastern Road will lead to a major traffic problem and extra pollution.</p> <p>Applicant Response</p> <p>Chapter 23 (Air Quality) of the ES (APP-138 Rev002) has taken a comprehensive approach to the assessment of the impacts to air quality. Areas of the A288 are predicted to experience negligible negative impacts to air quality of up to 0.2µg/m³, however these will only be for the duration of any road closures and diversions. Concentrations of air pollutants along Eastern Road are generally predicted to improve as a result of closures and diversions during the works period only.</p>
<p>RR-010</p>	<p>Elaine Husselby</p>	<p>Summary of Relevant Representation</p> <p>Portsmouth is a small over populated island with a lack of space and clean air</p> <p>Disruption to bus route and impact of works on the highway network causing queuing and impacts in areas deemed to have unsafe air quality/unacceptable pollution levels.</p> <p>Portsmouth is currently experiencing major problems with poor air quality. Reduction in life expectancy and cause of poor health.</p> <p>Applicant Response</p> <p>Chapter 23 (Air Quality) of the ES (APP-138 Rev002) has taken a comprehensive approach to the assessment of the impacts to air quality. The worst-case predictions along Baffins Road and Milton Road are for negligible deteriorations of up to 0.2µg/m³ which are imperceptible and only for the duration of diversions during construction.</p>
Health Impact		
<p>RR-032 RR-116</p>	<p>Jane Carter Michelle Juchau</p>	<p>Summary of Relevant Representation</p> <p>Health of Portsmouth citizens is at serious risk should any of the proposed work be carried out.</p> <p>Applicant Response</p> <p>Chapter 26 (Human Health) of the ES (APP-141) assesses the likely significant effects arising from the Proposed Development upon human health. The effect of changes in air quality at the Converter Station Area (Section 1) have been assessed as negligible during the construction stage, the assessment of impacts of pollutants to air on human health was scoped out for the Operational Stage at the Converter Station Area.</p>

PINS Ref	Respondent	
		The effects of changes to air quality during the Construction Stage of the Onshore Cable Corridor (Sections 2-10) have been assessed as having a temporary, minor adverse effect on human health, and during the Operational Stage a negligible to minor adverse effect has been determined. Overall, no likely significant effects on human health as a result of emissions to air resulting in respiratory health effects and anxiety due to perceived health effects have been identified.

5.6. ROUTE / ALTERNATIVES

PINS Ref	Respondent	
General		
RR-110	Louisa Newport	Summary of Relevant Representation
RR-169	Ian Perryman	A number of general concerns about the cable route which largely lack any specific locational references.
RR-160	David Bailey	
RR-167	Ian Cleugh	Applicant Response
RR-191	Cllr Simon Bosher	Chapter 3 (Description of the Proposed Development) of the ES (APP-118) provides a detailed description of the Onshore Cable Corridor.
RR-183	Nick Bertenshaw	Chapter 2 (Consideration of Alternatives) of the ES (APP-117) and the Supplementary Alternatives Chapter submitted as Appendix 3 of the Environmental Statement Addendum (document reference 7.8.1.3) explains the reasonable alternatives considered for the Onshore Cable Corridor and the reasons for the selection of the preferred option.
RR-156	Cllr Matthew Winnington	
RR-153	Christian Hannam	
RR-194	The Elliot's	
RR-013	Martin Farrelly	
RR-016	Michael Johnson	
RR-097	Ian Daye	
RR-160	David Bailey	
RR-122	P J Martin	
RR-133	Shaun Nightingale	
RR-140	Victoria Campbell	
RR-125	Paul Wright	
RR-108	Lois Marshall	
RR-151	Carol Tarr	
RR-044		

PINS Ref	Respondent	
	Cllr Caroline Brook	
Additional Information requested		
RR-083	Dawn Gilbert	Summary of Relevant Representation
RR-131	Robert Walden	Further information requested about the route.
RR-194	The Elliot's	Applicant Response
		Chapter 3 (Description of the Proposed Development) of the ES (APP-118) provides a detailed description of the Onshore Cable Corridor.
Alternative Route – Langstone Harbour		
RR-010	Elaine Husselby	Summary of Relevant Representation
RR-040	Anne Atkinson	Langstone Harbour should be used for the cable route, as this would avoid Portsmouth.
RR-082	David Jordan	Applicant Response
RR-084	Deborah Cutler	Chapter 2 (Consideration of Alternatives) of the ES (APP-117) and the Supplementary Alternatives Chapter submitted as part of the Environmental Statement Addendum [<i>doc ref 7.8.1</i>] explains the reasons why Langstone Harbour was not considered suitable for cable installation.
RR-091	GP Capt S A Hickey	
RR-143	OBE	
RR-145	Alison Gregory	
RR-178	Andrea Fay Smith	
RR-125	Malcolm Smith	
	Paul Wright	
Alternative Route – Hayling Island		
RR-016	Michael Johnson	Summary of Relevant Representation
		Could utilise disused railway branch line which runs length of Hayling Island.
		Applicant Response
		Paragraphs 2.4.11.14-16 of Chapter 2 (Consideration of Alternatives) of the ES (APP-117) and the Supplementary Alternatives Chapter submitted as part of the Environmental Statement Addendum [<i>doc ref 7.8.1</i>] explains the reasons why Hayling Island was discounted.

PINS Ref	Respondent	
Alternative – Kingsley Road		
RR-036	N Craise	Summary of Relevant Representation
		Better to continue the route of the cable through the park exiting at the pedestrian entrance on Kingsley Road and follow this road. Main concern with the route from Bransbury Park to the allotments via Yeo Court restricting access to rear of houses in Godiva Lawn, via Yeo Court.
		Applicant Response
Flexibility is retained to allow further consideration of options within the Order Limits as set out in paragraph 3.4.1.4 of ES Chapter 3 Project Description (APP-118).		
Portsmouth		
RR-016	Michael Johnson	Summary of Relevant Representation
RR-040	Anne Atkinson	Concern regarding landfall / use of roads through Portsmouth.
RR-082	David Jordan	
RR-187	Rosemary Sirett	Applicant Response
RR-156	Cllr Matthew	The Applicant anticipates that the proposed works will cause some disruption. The impacts of construction along the highway are assessed within the Transport Assessment (Appendix 22.1 of the ES (APP-448) and the Supplementary Transport Assessment (Doc Ref: 7.8.1.11). The Applicant considers that appropriate mitigation measures have been identified to ensure residents and businesses are not unduly affected, as set out in the Framework Traffic Management Strategy (ES Appendix 22.1A) (APP-449) and Framework Construction Traffic Management Plan (Appendix 22.2) (APP-450), and secured by the draft DCO Requirements 17 (Construction traffic management plan), 18 (Construction hours) and the proposed protective provisions for the protection of highways and traffic (APP-019).
RR-125	Winnington	
RR-010	Paul Wright	
RR-160	Elaine Hussleby	
RR-191	David Bailey	
RR-090	Cllr Simon Boshier	
RR-120	Georgina Butt	
RR-139	S Bagnall	
RR-178	Trudy Farley	
RR-187	Malcolm Smith	
RR-122	Rosemary Sirett	
RR-002	P J Martin	
	Peter Evans	

PINS Ref	Respondent	
Anmore Lane		
RR-195	Joseph Tee Kathryn Moore John Moore	Summary of Relevant Representation
		Impact on Anmore Lane should be avoided by taking a shorter and more direct route.
		Applicant Response
<p>The Applicant has refined the Order limits to reduce optionality where possible. In doing so, the Onshore Cable Route will run to the west of Hillcrest Children's Services, across Anmore Road perpendicularly, with the crossing to be installed very quickly, estimated within a day. Anmore Lane to the east of Soake Road will not be directly impacted by the installation with the exception of temporary traffic control managers.</p> <p>The Order Limit refinement has now removed plot 3-05 from the Order Limits, and has been updated in the relevant plans, including the Land Plans.</p>		
Landfall		
RR-061	Ingie Porteous	Summary of Relevant Representation
RR-090	Georgina Butt	Object to landfall at Eastney.
RR-187	Rosemary Sirett	Applicant Response
RR-125	Paul Wright	<p>A number of alternative landfall locations were considered as part of the optioneering process, as set out in ES Chapter 2 Consideration of Alternatives (APP-117). Paragraph 2.4.3 identifies the alternative landfall locations considered during the desktop study. Further information regarding the reasonable alternatives for the Proposed Development studied by the Applicant is provided in the Supplementary Alternatives Chapter [Doc Ref 7.8.1.3].</p>

5.7. CONVERTER STATION LOCATION

PINS Ref	Respondent	
General		
RR-038	Susan Crossley	Summary of Relevant Representation
RR-149	Bernard Johnson	Concern regarding the Converter Station / visual impact.
RR-146	Angela Herring	Applicant Response

PINS Ref	Respondent	
RR-173	Keith Coles	<p>Visual impacts on receptors are assessed in Chapter 15 (Landscape and Visual Amenity) of the ES (APP-130) and supporting appendices including Appendix 15.8 (Assessment of Landscape and Visual Effects) of the ES (APP-407).</p> <p>Chapter 3 (Description of the Proposed Development) of the ES (APP-118), paragraph 3.6.3.39 explains that the design of the buildings and electrical infrastructure is dictated to a high degree by their function. Specifically, the size of each building is determined by the need to accommodate the electrical and magnetic clearances for the equipment that it will contain. A maximum height of the valve hall building of 26 m (not higher than +111.10m AOD) has been identified to provide sufficient height for the main converter equipment whilst allowing necessary design flexibility over the options for the structure and roof pitches. The design principles set out within the Design and Access Statement (APP-114) seek to minimise the visual impact of the Converter Station.</p>
RR-046	Polly Beard	
RR-025	Guy Sheppard	
RR-029	David Jeffrey	
RR-039	Jeremy Warren	
RR-019	Brian Hill	
RR-150	Bruce Graham	
RR-054	Peter Carpenter & Dawn Carpenter	
RR-118	Judith Webberley	
RR-044	Cllr Caroline Brook	
Alternative Location		
RR-024	Susan Cox	Summary of Relevant Representation
RR-022	Louise Baker	Suggest alternative locations for the Converter Station.
RR-150	Bruce Graham	Applicant Response
RR-118	Judith Webberley	<p>A set of criteria were established with regards to the identification of the Converter Station location following the identification of Lovedean Substation as the grid connection point. These are set out in paragraph 2.4.5.2 of Chapter 2 (Consideration of Alternatives) of the ES (APP-117) which identified that the Site should be within 2 km (radius) of the existing Lovedean Substation due to a variety of factors, including but not limited to AC cable transmission losses, cable easement widths, footprint requirements, highway connections, and environmental and residential amenity impacts.</p> <p>In terms of landscape and visual amenity, the proposed location was the most suitable, being able to utilise the topography and surrounding hedgerows, hedgerow trees and woodland to provide visual screening, accepting that some immediate visual receptors would be affected.</p>
RR-070	Hillcrest	
RR-046	Polly Beard	Summary of Relevant Representation
RR-043	APLEAL Action Group	The accumulative effect of the interconnector site next to the Lovedean electricity substation will be both devastating on the nature and use of the area, and irreversible.
		Applicant Response
		The effects in combination with the existing Lovedean Substation (referred to in the relevant representation as accumulative effects) are included in the main assessment since this is part of the existing baseline. Section 15.9 of Chapter 15 (Landscape and Visual Amenity) of the

PINS Ref	Respondent	
		<p>Environmental Statement (APP-130) considers the cumulative effect with other development proposals in the planning system (at the time of writing the assessment).</p> <p>Moderate adverse significant effects on landscape character are identified in Table 29.13 Summary of cumulative assessment (Chapter 29 (Cumulative Effects) of the ES (APP-144) and Table 1 of Appendix 15.10 (Landscape and Visual Amenity Cumulative Effects Assessment Matrix (Stage 3 & 4)) (APP-408).</p>
Impact on South Downs National Park		
RR-015	Barry Scott	Summary of Relevant Representation
RR-022	Louise Baker	Concern over visual impact on the National Park.
RR-025	Guy Shepherd	Applicant Response
RR-157	Cllr Jacqueline Porter	<p>Visual impacts on immediate receptors and the National Park are assessed in Chapter 15 (Landscape and Visual Amenity) of the ES (APP-130) and within supporting appendix Appendix 15.8 (Assessment of Landscape and Visual Effects) of the ES (APP-407).</p> <p>The Landscape and Visual Impact Assessment (LVIA) concludes that there would be significant adverse visual effects for specific receptors (some residents, local recreational and transport users within 3 km of the Converter Station) and this includes parts of the South Downs National Park.</p>
Converter Station Impact on Views from SDNP, Portsdown Hill, Catherington Down		
RR-043	APLEAL Action Group	<p>Summary of Relevant Representation</p> <p>Negative adverse visual impact of the Converter Station on the landscape, including views from the South Downs National Park, Portsdown Hill and Catherington Down.</p> <p>Applicant Response</p> <p>The Landscape and Visual Impact Assessment (LVIA) (Chapter 15 (Landscape and Visual Amenity) of the ES (APP-130)) concludes that there will be significant adverse visual effects for specific receptors (some residents, local recreational and transport users within 3 km of the Converter Station) and this includes parts of the South Downs National Park.</p> <p>In terms of views further afield (3 to 8 km) including from Windmill Hill, Fort Widely (which is situated on Portsdown Hill), Old Winchester Hill and Butser Hill the LVIA considers that due to distance whilst there would be a minor-moderate to negligible adverse effect, these effects would not be significant.</p> <p>In terms of Catherington Down views of the Converter Station would be well screened by intervening vegetation resulting in a negligible not significant effect (paragraph 1.4.2.46) and supported by Figure 15.22 of the ES (APP- 255).</p>

PINS Ref	Respondent	
		Further information and reasoning is provided in Appendix 15.8 (Assessment of Landscape and Visual Effects) of the ES (APP-406). The updated Outline Landscape and Biodiversity Strategy (APP-506 Rev 002) seeks to mitigate impacts to landscape character for Section 1 (Converter Station Area)).
Amenity		
RR-015	Barry Scott Template objection letter (see Appendix 2 for list of interested parties)	Summary of Relevant Representation
		Loss of amenity, including green space where power station [sic] will be built in Lovedean.
		Applicant Response
		Chapter 3 (Description of the Proposed Development) of the ES (APP-118), paragraph 3.6.3.39 explains that the design of the buildings and electrical infrastructure are dictated to a high degree by their function. Specifically, the size of each building is determined by the need to accommodate the electrical and magnetic clearances for the equipment that it will contain. The Proposed Development does not propose to build a power generation station. It will include small capacity back up generators to be utilised only occasionally (paragraph 3.6.3.15 of ES Chapter 3). The comment is likely to refer to the Converter Station, which does not generate power and only converts direct current to the alternating current used by the National Grid electricity transmission system and in reverse. Within the Design and Access Statement (APP-114), General Design Principle 2 seeks “to integrate the proposed Converter Station and associated infrastructure into the surrounding topography, as far as practicable within operational requirements and environmental constraints”. This is carried through in the Indicative Landscape Mitigation Plans in the ES, Figures 15.48 and 15.49 (APP-281 & 282) which show new naturalistic landforms to the north and south of the Converter Station. A number of landscape mitigation measures are proposed throughout the Converter Station Area to mitigate against landscape and visual effects which are defined in section 15.8.4 of ES Chapter 15 Landscape and Visual Impact (APP-130). These include new woodland, scrub and grassland with hedgerows and hedgerow trees. Measures are described in the updated Outline Landscape and Biodiversity Strategy (APP-506 Rev002) and supporting figures.

5.8. EMF / RADIATION

PINS Ref	Respondent	Summary of Relevant Representation
Health		
RR-002 RR-006 RR-088	Peter Evans	Summary of Relevant Representation Health concerns relating to electromagnetic fields / radiation.
	James Veryard	
	Elizabeth Doyle	
		Applicant Response

PINS Ref	Respondent	Summary of Relevant Representation
RR-108	Lois Marshall	<p>Appendix 3.7 (Onshore Electric and Magnetic Field Report) of the ES (APP-361) provides an assessment of the electromagnetic field (EMF) due to the Proposed Development. For the HVAC Cables and HVDC Cables, this report concluded that:</p> <ul style="list-style-type: none"> • Due to the earthed shielding of the HVAC Cables and HVDC Cables there will be no electric field present along the Onshore Cable Route; • The HVAC and HVDC Onshore Cables are laid in agricultural land and along public highways, and the magnetic field strength is well below the guidelines and reduces rapidly with distance from the Onshore Cables; and • There will be no AC electric field outside of the Converter Station due to the earthed perimeter fence. <p>Public Health England (PHE) have responded to the Application through a Relevant Representation confirming that they are satisfied with the methodology used to undertake the environmental assessment. PHE agreed that the potential impacts of the static and alternating electric and magnetic fields associated with the onshore electricity infrastructure have been considered and satisfactorily addressed; and that they are satisfied that, based on the submitted documentation and suggested control/mitigation measures, the development is unlikely to present a significant risk to public health (see Section 4.17 Public Health England (RR-065)).</p> <p>Health evidence on EMF used in the Human Health assessment (including consideration of health evidence on EMF and children) is summarised within Chapter 26 (Human Health) of the ES (APP-141), Section 25.5.8.</p>
RR-115	Mark Lacey	
RR-197	Viola Langley	
RR-032	Jane Carter	
RR-137	Tracy Smith	
RR-173	Keith Coles	
RR-191	Cllr Simon Boshier	
RR-032	Jane Carter	
RR-006	James Veryard	
RR-032	Jane Carter	
RR-158	Dana Bubenickova	
RR-138	Trevor David Clifton	
RR-142	Alida Clifton	
RR-033	Peter Crockett	
RR-111	Lynn Mills	
	Template objection letter (see Appendix 2 for list of interested parties)	

5.9. SUPPORT

Table 5.1 - Summary of Relevant Representations – Members of the Public and Businesses – Support

PINS Ref	Respondent	
RR-007	John Cross	<p>Summary of Relevant Representation</p> <p>Support the Scheme because of the need for a secure and reliable energy supply.</p> <p>Applicant Response</p> <p>The Applicant welcomes the positive comments of support for the Proposed Development.</p>

5.10. BUS ROUTE

PINS Ref	Respondent	
RR-010	Elaine Husselby	Summary of Relevant Representation
RR-014	Andy Parks	Concerns over disruption to local bus routes.
RR-051	Cynthia White	Applicant Response
RR-058	Tracey Bottrell	
RR-106	Kirstin Knowlson-Clarke	The transport impacts of construction are fully assessed within the Transport Assessment (Appendix 22.1 of the ES) (APP-448).
RR-123	Pam Wilkie	Chapter 1.13 of the Framework Traffic Management Strategy (FTMS) (APP-449) identifies the limited impact upon sustainable transport networks and Chapter 6.2 of the FTMS identifies that where there are impacts upon bus lanes, temporary bus priority traffic signals will be provided where possible to mitigate the impact on public transport.
RR-159	Cllr Darren Sanders	<p>It is anticipated that the temporary works will cause some disruption to bus services. As set out within the Onshore Cable Route Construction Impacts on Access to Properties and Car Parking and Communication Strategy document, secured at Appendix 1 of the FTMS (APP-449-002), but this will be communicated to passengers, and contractors will have continuous contact with bus providers to inform them of any works on their routes. Any diversions to the west have been modelled and show no significant detrimental impacts to the city. A limited number of buses, if any, will be diverted westwards. A Communication Strategy has been included in the updated OOCEMP (APP-505 Rev 002) submitted with this document.</p> <p>The Onshore Cable Corridor does fall on the Moorings Way – Furze Lane Bus Link. As part of the consultation, a meeting was undertaken with First Group to ensure there is as little disruption as possible. Chapter 1.13 of the Transport Assessment (Appendix 22.1) addresses the impacts on sustainable transport networks.</p> <p>To mitigate the closure of the bus link, the Applicant will fund a shuttle bus service for the period of the construction works which is expected to be 2 weeks per circuit, as set out in the FTMS, and secured by the proposed protective provisions for the protection of the highway and traffic.</p> <p>The shuttle bus service will route along Moorings Way and Locksway Road, linking Service 13 route which will continue along Milton Road, therefore ensuring continued access to the bus service for all existing passengers.</p>
Public Transport (Bus Services)		
RR-089	First Hampshire, Dorset and Berkshire	Summary of Relevant Representation
		Revenue growth may potentially be affected during months of disruption. Potential impacts on level of service, passenger numbers, congestion and air quality.
		Applicant Response
		Engagement with First Hampshire, Dorset and Berkshire was undertaken by the Applicant prior to submission of the Application, with a meeting held on 22/08/2019 to discuss possible impacts of the proposals on the First bus network. During the aforementioned meeting, First suggested

PINS Ref	Respondent	
		<p>that the proposals did not present any significant concerns, as they are likely to be similar to roadworks that occur across the network on a regular basis.</p> <p>The anticipated impact of the proposals on Sustainable Transport Networks is set out in Section 1.13 of Appendix 22.1 (Transport Assessment) of the ES (APP-448). As is noted in paragraph 1.13.1.3 of the Transport Assessment, construction of the Onshore Cable Corridor will require, at points, the suspension of existing bus lanes in order to mitigate the impact on general traffic flow. However, as stated in paragraph 1.13.1.3, these works will take place in 100m sections and will be prohibited from occurring concurrently on roads within close proximity to one another. Bus priority will be maintained where a bus lane is suspended where possible through the provision of temporary bus priority traffic signals. Section 2.10 of the Framework Traffic Management Strategy (APP-449) includes for the bus priority signal and is secured by the proposed protective provisions for the protection of the highway and traffic. As stated in paragraph 1.13.1.6 of the Transport Assessment, potential delays will be communicated to passengers and the contractors will have continuous contact with bus providers to inform them of any works on their routes (along with timescale for works etc). This will allow the travelling public to be informed of changes to their daily travel patterns and plan ahead accordingly.</p>

5.11. PARKING

PINS Ref	Respondent	
Fort Cumberland Car Park		
RR-014	Andy Parks	Summary of Relevant Representation
RR-156	Cllr Matthew Winnington	There is no provision for temporary parking during the works to address the loss of space at the Fort Cumberland Car Park, moving parking pressure to other locations.
RR-187	Rosemary Sirett	<p>Applicant Response</p> <p>The effect on Fort Cumberland Car Park is assessed within ES Chapter 25 (Socio-economics) (APP-140) as negligible, not significant, indirect, permanent (with regards to the Optical Regeneration Station structure) and long-term. Further to the assessment, an illustrative phasing plan of works at Fort Cumberland Car Park is illustrated in Section 1.2.2 of Appendix 25.5 (APP-473), which shows how some car parking provision may be retained throughout the construction of the Proposed Development.</p> <p>The Residential Parking Survey, which is detailed in the Onshore Cable Route Construction Impacts on Access to Properties and Car Parking and Communication Strategy included as Appendix 1 of the FTMS. The FTMS (APP-449) outlines that although there may be some displacement with regard to parking, nearby roads can accommodate the additional cars without there being any adverse effect on the current availability of parking.</p>

5.12. AMENITY

General Amenity			
PINS Ref	Respondent		
RR-015	Barry Scott	Summary of Relevant Representation	
RR-051	Cynthia Whittle		
RR-133	Sean Nightingale	Concern regarding loss of amenity, impact on quality of life and disruption to communities.	
RR-197	Viola Langley	Applicant Response	
AS-022	Martin Lock		
RR-092	Graham O'Neil		
RR-108	Lois Marshall		
RR-126	Peter Handley		
RR-156	Cllr Matthew Winnington		
RR-105	Kelvin Pine		
RR-193	Terrence Garnett		
			Chapter 26 (Human Health) of the ES (APP-141) assesses the likely significant effects identified in other ES Chapters including but not restricted to Noise, Air Quality, Traffic and Transport arising from the Proposed Development upon human health. Mitigation is identified within each chapter and included in the OOCEMP (APP-505) which is secured by Requirement 15 of the dDCO (APP-019).
			Public Health England have confirmed that they are satisfied with the methodology used to undertake the environmental assessment and that based on the submitted documentation and suggested control/mitigation measures, the development is unlikely to present a significant risk to public health (see Section 4.17 Public Health England (RR-065)).

Specific Properties		
PINS Ref	Respondent	
RR-027	Karen Holden-Craufurd	Summary of Relevant Representation
RR-055	Little Denmead Farm	
RR-054	Peter Carpenter & Dawn Carpenter	Concerned that there will be an impact on private water supply if the cable runs too close to the property boundary.
		Traffic noise and vibration will be significantly detrimental to use and enjoyment of the residential property.
		Noise and vibrations from construction traffic.
		Applicant Response
		The noise and vibration assessment can be found in Chapter 24 (Noise and Vibration) of the ES (APP-139). Regarding water supply, each service crossing will be designed with the agreement of the service owner, who will define the parameters for a crossing, review the design, and be invited to attend the installation. All service crossings will be undertaken maintaining a nominal clearance of 500 mm between the Proposed Development and any third-party asset. There are no areas of agricultural land within or adjacent to the Order Limits that rely on irrigation. There are a number of land holdings that are used for grazing horses and that rely on adequate water supplies, but the information collected by the Applicant's agricultural consultants during farm visits did not establish whether these holdings rely on private or public water supplies.
		The Onshore Outline Construction Environmental Management Plan as updated (APP-505 Rev002) and secured by requirement 15 of the dDCO (APP-019), includes at section 5.4.1.2 for the replacement of any temporarily severed water supplies as may occur.

Specific Properties		
RR-070	Hillcrest	<p>Summary of Relevant Representation</p> <p>Loss of rural setting and views to the rear. Converter Station will be clearly visible and have an overbearing impact.</p> <p>Noise, light and dust from construction and noise from operation of the converter station will have a significant detrimental impact on day-to-day lives.</p> <p>Options B(i) and B(ii) will have very similar impact.</p> <p>Applicant Response</p> <p>Mitigation measures are proposed to the south of Hillcrest in the form of new woodland planting to provide some screening, see Figure 15.48 (Indicative Landscape Mitigation Plan (Option B(i)(north)) of the ES (APP-281).</p> <p>In terms of lighting, measures will be taken to minimise the impact of temporary construction lighting through the design and layout of site construction areas (paragraph 15.7.1.2, Chapter 15 (Landscape and Visual Amenity) of the ES) and paragraph 1.4.2.7 in the Outline Landscape and Biodiversity Strategy (APP-506), now paragraph 1. 5.1.4 in the updated OLBS (APP-506 Rev002).</p> <p>Paragraph 5.3.1.1 of the Onshore Outline Construction Environmental Mitigation Plan (APP-505) and as updated (APP-505-Rev002) states that construction will be restricted to daylight hours between dawn and dusk for the Converter Station Area during the active season (April to October). Table 3.7 in Chapter 3 (Description of the Proposed Development) of the ES (APP-505) states that for the Converter Station the anticipated working hours will be 10 hour shifts 08.00-18.00 over a six-day week with Saturday working typically a 5 hour shift from 08.00 to 13.00 hrs. The updated OOCEMP (APP-505 Rev002) also states at paragraph 5.2.2.1 that the appointed contractor will develop a Lighting Scheme for the Construction and Operational Stages of the Converter Station Area.</p> <p>The noise and vibration assessment can be found in Chapter 24 (Noise and Vibration) of the ES (APP-139), with dust addressed in the updated ES Chapter 23 Air Quality (APP-128 Rev002).</p>

Business Impact		
RR-054	Peter & Dawn Carpenter	<p>Summary of Relevant Representation</p> <p>Scheme will significantly interfere with farming activities and have a significant detrimental impact.</p>
RR-055	Little Denmead Farm	

Business Impact		
RR-067	Robin Jefferies	Making a living from farming will no longer be possible due to a lack of land. There will be limited opportunities to find employment with other local farmers.
RR-149	Bernard Johnson	The scheme will cause amenity impacts from construction traffic dust on fields and paddocks, which will prevent grazing. Traffic noise and vibration will be significantly detrimental to use and enjoyment of the residential property. Property affected by permanent easements through the centre of their holding. Route is impractical from a land management view point.
RR-041	J R Sykes Farms	
RR-194	The Elliotts	
Applicant Response		
Impacts and effects on Soils and Agricultural Land Use have been assessed in Chapter 17 (Soils and Agricultural Land Use) of the ES (APP-132) and supporting Appendices of the ES: Appendix 27.3 (Cumulative Effects Assessment Matrix (Stage 1 & 2)) (APP-479) and Appendix 27.4 (Cumulative Effects Assessment Matrix (Stage 3 &4)) (APP-480).		
The assessment of the potential effects on Little Denmead Farm is set out in Chapter 17 (Soils and Agricultural Land Use) (Section 17.6.2). This indicates that approximately 12.8 ha (60% of the farm) will be required temporarily and permanently from Little Denmead Farm, which would be a high magnitude of impact on a low sensitivity holding and give rise to moderate adverse temporary and permanent effects.		
The assessment within the ES is therefore an accurate reflection of the impact on the farm. Paragraph 17.4.2.5 of Chapter 17 (Soils and Agricultural Land Use) recognises that, as discussions are ongoing with landowners, no account has been taken of any potential mitigation measures for land holdings so the assessment in the ES presents a worst case for the effects on farm holdings.		
Paragraph 17.8.1.6 of Chapter 17 states that 'Mitigation relating to the permanent loss of farmable area to the affected farm holdings are matters of private negotiation and therefore cannot be incorporated into this assessment'.		
Discussions are ongoing with landowners with regards to acquisition in the hope of reaching an agreement with the impacted parties.		

5.13. HEALTH AND WELLBEING

PINS Ref	Respondent	
RR-032	Jane Carter	Summary of Relevant Representation
RR-108	Lois Marshall	
RR-137	Tracy Smith	Proposal will have a detrimental impact on physical and mental health.
RR-152	Chris Seaton	Applicant Response
RR-191	Cllr Simon Boshier	
AS-022	Martin Lock	
Chapter 26 (Human Health) of the 'ES (APP-141) assesses the likely significant effects arising from the Proposed Development upon human health.		

PINS Ref	Respondent	
		Public Health England have confirmed that they are satisfied with the methodology used to undertake the environmental assessment and that based on the submitted documentation and suggested control/mitigation measures, the development is unlikely to present a significant risk to public health (See Section 4.17 Public Health England (RR-065)).

5.14. CONTAMINATION

PINS Ref	Respondent	
Contamination including Milton Common		
RR-034	Alistair Thompson	<p>Summary of Relevant Representation</p> <p>Query regarding the steps that will be taken to prevent exposure and release of materials buried on the proposed route, and inspections. There is reclaimed land at Milton Common that still requires methane ventilation. Construction work would disturb the contaminated land.</p> <p>Applicant Response</p> <p>Section 18.9 of Chapter 18 (Ground Conditions) of the ES (APP-133) confirms that the landfill at Milton Common produces methane gas, which could pose a risk to human health, however this risk was mitigated against in the 1990s with the installation of a perimeter gas vent trench and vent stacks to prevent migration of landfill gas beyond the site boundary and also by repairs to a number of cracks in the informal landfill cap. This risk would be further mitigated during construction of the Proposed Development by the inclusion of clay stanks (or similar) at intervals along the trench route to prevent migration of landfill gas along the route which would reduce the risk to negligible. Further details on mitigation measures related to exposure to buried material within landfills along the Onshore Cable Corridor are identified in paragraphs 18.9.2.1 to 18.9.2.3.</p>
RR-106	Kirstin Knowlson Clark	
RR-119	Julie Grove	
RR-134	Sheila Roy	
RR-159	Cllr Darren Sanders	
RR-044	Cllr Caroline Brook	
	Template objection letter (see Appendix 2 for list of interested parties)	
Fraser Range		
RR-143	Alison Gregory	<p>Summary of Relevant Representation</p> <p>Fraser Range is contaminated. Concern on potential exposure and potential spread of further ground contamination when land is disturbed with associated health risks.</p> <p>Applicant Response</p> <p>Section 18.9 of Chapter 18 (Ground Conditions) of the ES (APP-133) confirms ground investigation carried out in 2018 found no exceedances above the human health assessment criteria at Fraser Range, indicating a very low risk to human health (see Section 9 of Appendix 18.1 (Preliminary Risk Assessment and Generic Quantitative Risk Assessment) of the ES (APP-429)).</p> <p>The historic military use of the landfall site is not considered to constitute an environmental or human health risk from contamination due to the historical and isolated nature of the site use.</p>

	Details of mitigation measures relevant to exposure of contaminated land are identified at paragraph 18.9.2.1.
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5.15. NOISE AND VIBRATION - CONSTRUCTION

PINS Ref	Respondent	
General		
RR-008	Jackie Stevens	Summary of Relevant Representation
RR-054	Peter Carpenter & Dawn Carpenter	Noise and vibration impact on residential amenity during construction.
RR-170	Jan Leonard	Applicant Response
RR-061	Ingie Porteous	The predicted noise and vibration impacts during the construction stage of the Proposed Development are identified in Section 24.6 to 24.9 of Chapter 24 (Noise and Vibration) of the ES (APP-139). With respect to the impact of vibration from construction works on buildings, the levels of vibration predicted as part of the noise and vibration assessment are not of sufficient magnitude to cause building damage.
RR-070	Hillcrest	
RR-137	Tracy Smith Template objection letter (see Appendix 2 for list of interested parties)	The embedded noise mitigation measures that will be applied at all phases of the construction stage are detailed in Appendix 24.2 (Best Practicable Measures to be Employed during Construction) of the ES (APP-461), and these measures will be secured through the OOCMP (APP-505).
Converter Station Area		
RR-019	Brian Hill	Summary of Relevant Representation
RR-029	David Jeffery	Noise will have a dramatic impact on the rural Lovedean area and should be measured in conjunction with the existing substation.
RR-039	Jeremy Warren	Applicant Response
		A baseline noise survey included quantifying the background noise levels which included the existing Lovedean Substation. The methodology underpinning this survey is contained in paragraphs 24.4.1.1 to 24.4.1.11 of Chapter 24 (Noise and Vibration) (APP-139) and Figure 24.1 (Section 1 – Noise Survey Measurement Locations and Sensitive Receptors surrounding Converter Station) of the ES (APP-335) and shows the measurement locations, the survey results being presented in Tables 24.15, 24.16, 24.17, 24.18 and 24.19 of Chapter 24 (Noise and Vibration).
		The results of the operational noise assessment for the Converter Station are presented at paragraphs 24.6.2.15 to 24.6.2.24 of Chapter 24 (Noise and Vibration) of the ES (APP-139). Following the inclusion of embedded mitigation measures (paragraphs 24.6.1.11 to 24.6.1.13) and additional mitigation measures (paragraphs 24.8.1.1 to 24.8.1.4), the operational noise effects of the Converter Station are expected to be negligible (not significant).

5.16. CONSTRUCTION IMPACT

PINS Ref	Respondent	
RR-038	Susan Crossley	Summary of Relevant Representation
		Concern regarding the effect of the construction work on the landscape.
		Applicant Response
		<p>The OOCEMP paragraph 5.2 (APP-505) states that the following measures will be adopted during construction works to ensure protection of the existing landscape setting and views to the construction site:</p> <ul style="list-style-type: none"> • Temporary screening for sensitive visual receptors through implementation of solid construction hoardings whilst using natural existing screens (topsoil and existing vegetation) where practicable. Hoardings would be attractive, used to screen low level “clutter” and reduce noise; • Appropriate location, organisation and phasing of construction activities; • Maintenance of a tidy and contained site compound to reduce visual clutter; • Large plant /equipment would be located away from most sensitive receptors where there are viable alternatives; and • Measures to control working hours in specific locations to avoid disturbance to residential receptors both in term of light and noise.

5.17. NOISE AND VIBRATION - OPERATION

PINS Ref	Respondent	
RR-006	James Veryard	Summary of Relevant Representation
		Concern about noise (buzz) from cables.
		Applicant Response
		<p>Table 24.2 of Chapter 24 (Noise and Vibration) of the ES (APP-139) assesses the noise and vibration impact of the Proposed Development. The HVDC Cables laid within the Onshore Cable Corridor will be buried and therefore noise effects during the Operational Stage are expected to be negligible.</p>
RR-008	Jackie Stevens	Summary of Relevant Representation
RR-070	Hillcrest	Concern about operational noise (including electrical noise) from Converter Station in a quiet area and its impact.

PINS Ref	Respondent	
RR-136	Tracy Barker	<p>Applicant Response</p> <p>The results of the operational noise assessment for the Converter Station are presented at paragraphs 24.6.2.15 to 24.6.2.24 of Chapter 24 (Noise and Vibration) of the ES (APP-139), as amended by section 17.2 of the ES Addendum (document reference 7.8.1). The operational assessment has accounted for the effects of noise during both the daytime and night-time.</p> <p>Following the inclusion of embedded mitigation measures (paragraphs 24.6.1.11 to 24.6.1.13), and additional mitigation measures (paragraphs 24.8.1.1 to 24.8.1.4), the operational noise effects of the Converter Station are expected to be negligible (not significant). The measures included to mitigate the noise from the Converter Station include the layout and orientation of the buildings/equipment and mitigation applied to individual equipment items (for example enclosures or silencers).</p> <p>The control of operational noise from the Converter Station will be secured through the adoption of broadband and octave band noise criteria (see the Operational Broadband and Octave Band Noise Criteria Document (document reference 7.7.11)). Broadband noise is the overall noise level and octave band noise is noise across different frequencies. The noise criteria have been determined using the principles of British Standard 4142:2014+A1:2019 (Methods for rating and assessing industrial and commercial sound). These noise criteria will ensure that the operational noise levels from the Converter Station are negligible, as concluded in Chapter 24 of the ES (APP-139).</p>
RR-022	Louise Baker	
RR-025	Guy Shepherd	
RR-014	Andy Parks	
RR-019	Brian Hill	
RR-029	David Jeffery	
RR-054	Peter Carpenter & Dawn Carpenter	
RR-046	Polly Beard	
RR-43	APLEAL Action Group	

5.18. ACCESS TO HOMES

PINS Ref	Respondent	Summary of Relevant Representation
RR-013	Martin Farrelly	<p>Summary of Relevant Representation</p> <p>Concerns regarding route blocking one-way roads and access to residential properties.</p> <p>Applicant Response</p> <p>Section 2.5.3 of the Framework Traffic Management Strategy (APP-449) states that residential and business access will be maintained wherever possible with different traffic management approaches applied depending upon the circumstances.</p> <p>Full details of the strategy for providing access to homes is included in the Onshore Cable Route Construction Impacts on Access to Properties and Car Parking and Communication Strategy included as Appendix 1 of the (APP-449) submitted alongside this response.</p>
RR-032	Jane Carter	
RR-036	N Craise	
RR-058	Tracey Bottrell	

5.19. HOUSE PRICE AND LAND VALUE

PINS Ref	Respondent	
RR-006	James Veryard	Summary of Relevant Representation

PINS Ref	Respondent	
RR-019	Brian Hill	Detrimental effect on house/property/land price, and saleability.
RR-144	Amanda Whiteland-Smith	Impact on value and saleability of agricultural land (including development potential).
RR-152	Chris Seaton	
RR-045	Patricia Conran	Applicant Response
RR-070	Hillcrest	Depreciation of property value is not a matter that is “important and relevant” to the Secretary of State’s decision on the AQUIND Interconnector application under section 104 of the Planning Act 2008.
RR-055	Little Denmead Farm	
RR-067	Robin Jefferies	
RR-195	Joseph Tee	
	Kathryn Moore John Moore	

5.20. COMPULSORY ACQUISITION

PINS Ref	Respondent	
RR-055	Little Denmead Farm	Summary of Relevant Representation
RR-054	Peter Carpenter &	Consider the Applicant has failed to demonstrate that the extent of the compulsory acquisition (including permanent landscaping rights) is necessary and proportionate, taking only what is required.
RR-067	Dawn Carpenter	
RR-070	Robin Jefferies	
RR-083	Hillcrest	
	Dawn Gilbert	Applicant Response
		The need and justification for the extent of the compulsory acquisition sought is explained within the Statement of Reasons (APP-022). The reasonable alternatives studied for the Proposed Development taking into account technical, cost and environmental considerations are explained in Chapter 2 (Consideration of Alternatives) of the ES (APP-117) and the Supplementary Alternatives Chapter submitted as part of the Environmental Statement Addendum (doc ref 7.8.1.3).
RR-195	Joseph Tee	Summary of Relevant Representation
	Kathryn Moore	Consider the Applicant has not sufficiently demonstrated an attempt to purchase rights in our client’s land by agreement, other than to issue terms to the Land Agent as part of the Compulsory Acquisition.
	John Moore	
		Applicant Response

PINS Ref	Respondent	
		<p>The Applicant's agent has engaged with the landowner and their agent, including a face to face meeting with the landowners at their property in March 2019 to take them through the Consultation Document and provide an overview of the cable route options being considered by the Project in the vicinity of their property. Heads of Terms providing further information were issued to the landowner's agent in early 2020 and these have been discussed with the landowner's agent at subsequent face to face meetings.</p> <p>Notwithstanding the information provided above, the Applicant can confirm the option for the cable route via the landowner's property has been discounted and the Applicant will not be seeking any rights over the landowner's property. The landowner's agent has been informed of this decision and it is reflected in the updated application documents</p>

5.21. COMMUNITY EVENTS

PINS Ref	Respondent	
RR-010	Elaine Husselby	<p>Summary of Relevant Representation</p> <p>Community events will be greatly disrupted.</p> <p>Applicant Response</p> <p>Chapter 25 (Socio-economics) of the ES (APP-140) assesses the impact upon community events and festivals, primarily as a function of traffic impacts and temporary use of open space.</p>

5.22. RENEWABLE GENERATION

PINS Ref	Respondent	Summary of Relevant Representation
RR-010	Elaine Husselby	<p>Summary of Relevant Representation</p> <p>UK should be producing its own renewable, sustainable energy, and not importing from abroad.</p> <p>Applicant Response</p> <p>The Needs and Benefits Report (AAP-115) submitted with the Application and the Addendum to the Report (document reference 7.7.7) demonstrates the needs case for the Proposed Development.</p>
RR-139	Trudy Farley	
RR-135	Sylvia Holdforth	
RR-143	Alison Gregory	
RR-147	Anna Carter	
RR-188	Ruth Taylor	
RR-125	Paul Wright	
RR-159	Darren Sanders	<p>Summary of Relevant Representation</p> <p>The power supply is not going to Portsmouth homes, there is no guarantee the electricity on the cable will come from renewable sources nor a guarantee that the project itself will be carbon neutral.</p> <p>Applicant Response</p> <p>The energy would be supplied to the NGET, which supplies the whole UK electricity network including Portsmouth homes.</p> <p>The energy supplied to the UK would be sourced from the French energy network and is considered to be low carbon, see 28.6.2.6 of the ES Chapter 28 (Carbon and Climate Change) (APP-143).</p> <p>The Needs and Benefits Report (AAP-115) submitted with the Application and the Addendum to the Report (document reference 7.7.7) demonstrates the needs case for the Proposed Development.</p>
RR-044	Cllr Caroline Brook	

5.23. ALTERNATIVES/OPTIONS

PINS Ref	Respondent	Summary of Relevant Representation
		Summary of Relevant Representation
RR-010	Elaine Husselby	<p>Concern over the impact on Portsmouth and surrounding area and general comments on alternative options/locations.</p> <p>Applicant Response</p> <p>Chapter 2 (Consideration of Alternatives) of the ES (APP-117) and the Supplementary Alternatives Chapter submitted as part of the Environmental Statement Addendum (doc ref 7.8.1.3] provides an assessment of the reasonable alternative options considered for the Proposed Development.</p>
RR-013	Martin Farrelly	
RR-016	Michael Johnson	
RR-017	Brenda Lock	
RR-022	Louise Baker	

PINS Ref	Respondent	Summary of Relevant Representation
RR-024	Susan Cox	
RR-040	Anne Atkinson	
RR-042	Veronica Knight	
RR-050	Patrick Whittle	
RR-051	Cynthia Whittle	
RR-073	Allison Udy	
RR-075	Annette Sartori	
RR-084	Deborah Cutler	
RR-085	Debra Wallace	
RR-091	GP Capt S A Hickey OBE	
RR-097	Ian Daye	
RR-118	Judith Webberley	
RR-122	PJ Martin	
RR-125	Paul Wright	
RR-127	Peter James	
RR-143	Alison Gregory	
RR-145	Andrea Fay Smith	
RR-151	Carol Tarr	
RR-157	Cllr Jacqueline Porter	
RR-160	David Bailey	
RR-178	Malcolm Smith	
AS-022	Martin Lock	
RR-036	N Craise	

5.24. CONVERTER STATION LOCATION AND DESIGN

PINS Ref	Respondent	
RR-014	Andy Parks	<p>Summary of Relevant Representation</p> <p>No detailed design submitted for the Converter Station.</p> <p>Applicant Response</p> <p>The Planning Inspectorate’s Advice Note Nine: Rochdale Envelope (July 2018) explains that <i>“The ‘Rochdale Envelope’ approach is employed where the nature of the Proposed Development means that some details of the whole project have not been confirmed (for instance the precise dimensions of structures) when the application is submitted, and flexibility is sought to address uncertainty”</i>.</p> <p>Where such flexibility is required, the Advice Note confirms that the applicant should establish those parameters likely to result in the maximum adverse effect (the worst-case scenario) and the environmental impact assessment should be undertaken accordingly. This approach has been taken for the Application.</p> <p>The explanation for why this approach has been taken and the requirement for flexibility associated with the siting of the Converter Station Area is explained in Section 5.2 of the Statement of Reasons (APP-022).</p> <p>A set of design principles has been established which will dictate the requirements for the final design and these are referred to in Section 6 of the Design and Access Statement (APP-114).</p>
RR-015	Barry Scott	<p>Summary of Relevant Representation</p> <p>Converter Station location adjacent to the National Park / Countryside.</p> <p>Applicant Response</p> <p>Chapter 2 (Consideration of Alternatives) of the ES (APP-117) and the Supplementary Alternatives Chapter submitted as part of the Environmental Statement Addendum [<i>doc ref 7.8.1</i>] provides an assessment of the reasonable alternative options considered for the Proposed Development, including in respect of the grid connection point and the location of the Converter Station in proximity to Lovedean Substation.</p> <p>The landscape and visual effects on landscape character, associated landscape features, the setting of the South Downs National Park and visual receptors are assessed in ES Chapter 15 Landscape and Visual Amenity (APP-130) and supporting appendices including Appendix 15.8 Assessment of Landscape and Visual Effects (APP-407).</p> <p>The landscape features, visual receptors and setting adjacent to the National Park are reflected in the general design principles as referred to in section 6.2.1. of the Design and Access Statement (APP-114).</p> <p>Noise impacts are assessed in ES Chapter 24 (APP-139) which concluded that there will be a negligible (not significant) effect on the National Park and countryside from the Converter Station.</p>
RR-022	Louise Baker	
RR-024	Susan Cox	
RR-025	Guy Shepherd	
RR-029	David Jeffery	
RR-038	Susan Crossley	
RR-039	Jeremy Warren	
RR-046	Polly Beard	
RR-070	Hillcrest	
RR-118	Judith Webberley	
RR-150	Bruce Graham	
RR-157	Cllr Jacqueline Porter	

PINS Ref	Respondent	
RR-025 RR-044	Guy Shepherd Cllr Caroline Brook	<p data-bbox="857 422 1397 457">Summary of Relevant Representation</p> <p data-bbox="857 491 2694 562">Query regarding whether the Converter Station can be lowered into the ground and spoil used for bunding and landscaping to improve aesthetics and shield some of the noise. A green roof such as Peacehaven Waste Water treatment plant is essential for a scheme like this.</p> <p data-bbox="857 611 1151 646">Applicant Response</p> <p data-bbox="857 674 2742 821">The Design and Access Statement (DAS) (APP-114) includes General Design Principle 2 which seeks “to integrate the proposed Converter Station and associated infrastructure into the surrounding topography, as far as practicable within operational requirements and environmental constraints” which include a known aquifer (paragraph 4.3.3 of the DAS). This is carried through in the Indicative Landscape Mitigation Plans in the ES, Figures 15.48 and 15.49 (APP-281 & 282) which show new naturalistic landforms to the north and south of the Converter Station.</p> <p data-bbox="857 848 2742 919">The Applicants design team considered options including a green roof, but this was subsequently discounted, including following the feedback from the local authorities, due the nature of the building, its use and the structural implications.</p>
RR-157 RR-173	Cllr Jacqueline Porter Keith Coles Template objection letter (see Appendix 2 for list of interested parties)	<p data-bbox="857 961 1397 997">Summary of Relevant Representation</p> <p data-bbox="857 1031 1685 1066">Concern regarding building height and location in countryside.</p> <p data-bbox="857 1108 1151 1144">Applicant Response</p> <p data-bbox="857 1241 2694 1373">Chapter 2 (Consideration of Alternatives) of the ES (APP-117) and the Supplementary Alternatives Chapter submitted as part of the Environmental Statement Addendum (doc ref 7.8.1) provides an assessment of the reasonable alternative options considered for the Proposed Development, including in respect of the grid connection point and the location of the Converter Station in proximity to Lovedean Substation.</p> <p data-bbox="857 1394 2742 1507">Chapter 3 (Description of the Proposed Development) of the ES (APP-118), paragraph 3.6.3.39 explains that the design of the buildings and electrical infrastructure is dictated to a high degree by their function. Specifically, the size of each building is determined by the need to accommodate the electrical and magnetic clearances for the equipment that it will contain.</p> <p data-bbox="857 1520 2742 1703">General Design Principle 2 of the Design and Access Statement (APP-144) seeks “to integrate the proposed Converter Station and associated infrastructure into the surrounding topography, as far as practicable within operational requirements and environmental constraints”. Section 5.3 of the Design and Access Statement, (APP-114) details how the size is dictated by the function of the Converter Station. This is carried through in the Indicative Landscape Mitigation Plans in the ES, Figures 15.48 and 15.49 (APP-281 & 282) which show new naturalistic landforms to the north and south of the Converter Station.</p> <p data-bbox="857 1724 2742 1829">A number of landscape mitigation measures are proposed throughout the Converter Station Area to mitigate landscape and visual effects. These include new woodland, scrub and grassland with hedgerows and hedgerow trees. Measures are described in the updated Outline Landscape and Biodiversity Strategy (APP-506 Rev002) and supporting figures.</p>

PINS Ref	Respondent	
RR-070	Hillcrest	Summary of Relevant Representation
RR-118	Judith Webberley	Concern regarding impact on view from property.
RR-048	Judith Ann Clementson	
		Applicant Response
		Chapter 15 (Landscape and Visual Amenity) (APP-130) of the ES assesses the visual impact of the Proposed Development.
RR-039	Jeremy Warren	Summary of Relevant Representation
		There are no accurate images of the appearance of the converter building or the mitigating landscaping to hide it. The only images published so far are entirely inaccurate and misleading computer images.
		Applicant Response
		The images of the Converter Station are shown as wirelines and photomontages (Figures 15.18 to 15.37 of the ES (APP-251 to APP-270)). Indicative photomontages based on Option B(i) were prepared for the purposes of the Landscape and Visual Assessment and based on current good practice guidance detailed in Appendix 15.3 (Landscape and Visual Assessment Methodology) of the ES (APP 401).

5.25. LANDSCAPING

PINS Ref	Respondent	
RR-019	Brian Hill	Summary of Relevant Representation
RR-118	Judith Webberley	Landscaping is not sufficient, will not screen the Converter Station, and does not include time for landscaping to mature.
RR-029	David Jeffrey	
RR-039	Jeremy Warren	
RR-070	Hillcrest	Applicant Response
RR-046	Polly Beard	The proposed planting referred to in Figure 15.48 and 15.49 (Indicative Landscape Mitigation Plans (north and south)) of the ES (APP-281 and APP-282) and the updated Outline Landscape and Biodiversity Strategy (APP-506 Rev002) will over time provide screening for some visual receptors and measures have been taken to enhance existing hedgerows through new planting of hedgerow plants and hedgerow trees to contribute to a partial screening function (paragraph 1.6.5.2.).
RR-038	Susan Crossley	
RR-044	Clr Caroline Brook	
RR-042	Veronica Knight	Summary of Relevant Representation

PINS Ref	Respondent	
RR-048	Judith Ann Clementson	<p>Concern that Bransbury Park, Allotments and Foreshore may not be fully reinstated.</p> <p>Local considerations, including long term mitigation for road and landscape maintenance.</p> <p>Applicant Response</p> <p>In areas where trenchless installation methods (i.e. HDD) are proposed, it should not be necessary to reinstate or restore land. Methods for dealing with any environmental incident will be described in the Onshore Outline Construction Environmental Management Plan (OOCEMP) (APP-505).</p> <p>The OOCEMP paragraph 6.2.3.1 bullet points 15 to 17 states that there will be the “prompt reinstatement of temporary construction areas (including trenches, laydown and construction (including haul road) corridor on completion of the cable route installation as soon as practicable after sections of work are complete. Reinstatement would involve the careful handling of soils and a return to the existing habitat type. Mitigation planting will take place to replace hedgerows and trees lost following completion of the construction works.”</p> <p>Requirement 22 of dDCO also secures the restoration of land temporarily used for construction.</p>
RR-045	Patricia Conran	<p>Summary of Relevant Representation</p> <p>Landscaping must be protected by fencing to safeguard horses.</p> <p>Applicant Response</p> <p>Careful consideration will be given to the requirement for equine fencing to be installed at specific locations where such fencing is established as being required. Discussions are ongoing with the landowner.</p>
RR-055 RR-070	Little Denmead Farm Hillcrest	<p>Summary of Relevant Representation</p> <p>Concern regarding permanent rights for landscaping (only grassland and hedgerows not screening) are not appropriate interfering with the landowners’ rights.</p> <p>Applicant Response</p> <p>Rights over areas of land within the ownership of the affected parties which provide existing vegetation which will serve a screening function are required as part of the landscaping strategy to assist with the screening of the Converter Station. The areas of land identified for this purpose are considered to be reasonable and only so much as is necessary and aligns with the scale of the project. Further detail is provided in the Statement of Reasons (APP-022), section 6.1.7 which covers new landscaping rights.</p>

5.26. LANDSCAPE

PINS Ref	Respondent	
RR-039	Jeremy Warren	<p>Summary of Relevant Representation</p> <p>Concern over the Converter Station impact on the landscape, visibility from vantage points due to scale, including long distance views from the National Park.</p> <p>Applicant Response</p> <p>Longer distance views (3 to 8 km) including from Windmill Hill, Fort Widely (which is situated on Portsdown Hill), Old Winchester Hill and Butser Hill are considered in ES Chapter 15 (APP-130). This concludes that due to distance, whilst there would be a minor-moderate to negligible adverse effect, this effect would not be significant. Overall the Converter Station would form a small proportion of the view and would not alter the overall composition, depth of view or break the skyline (paragraph 1.4.2.29 to 1.4.2.48). The visual extent is demonstrated in Figures 15.19, Figure 15.26, Figure 15.33 and Figure 15.34 of the ES (APP-252, APP-259, APP-266 and APP-267 respectively).</p> <p>A number of landscape measures are proposed throughout the Converter Station Area to mitigate landscape and visual effects. These include new woodland, scrub and grassland with hedgerows and hedgerow trees. Measures are described in the updated Outline Landscape and Biodiversity Strategy (APP-506 Rev002) and supporting figures.</p>
RR-046	Polly Beard	
RR-146	Angela Herring	
RR-157	Cllr Jaqueline Porter	
RR-150	Bruce Graham	
RR-070	Hillcrest	

5.27. FUNDING

PINS Ref	Respondent	
RR-015	Barry Scott	<p>Summary of Relevant Representation</p> <p>The source and the legality of the funding is not transparent, including limited company assets and liabilities.</p> <p>Applicant Response</p> <p>The Funding Statement (APP-023) explains how the Proposed Development would be funded, including the funding of any land to be purchased through compulsory acquisition.</p>
RR-051	Cynthia Whittle	
RR-050	Patrick Whittle	

5.28. NEED

PINS Ref	Respondent	
RR-024	Susan Cox	<p>Summary of Relevant Representation</p> <p>Comments made regarding the need for an interconnector.</p>
RR-061	Ingie Porteous	
RR-087	Ed Waller	

PINS Ref	Respondent	
RR-088	Elizabeth Doyle	<p>Applicant Response</p> <p>This Needs and Benefits Report (AAP-115) submitted with the application and the Addendum submitted at Deadline 1 (document reference 7.7.7) demonstrate the needs case for the Proposed Development.</p>
RR-048	Judith Ann Clementson	
RR-050	Patrick Whittle	
RR-114	Lynsey Christopher	
RR-115	Mark Lacey	
RR-135	Sylvia Holdforth	

5.29. DEVELOPER CONTRIBUTIONS

PINS Ref	Respondent	
RR-025	Guy Shepherd	<p>Summary of Relevant Representation</p>
RR-039	Jeremy Warren	
RR-046	Polly Beard	Considers the Converter Station will be manned, thus liable for CIL, and queries s106 obligations for off-site mitigation.
RR-071	Southsea Brewing Co.	
RR-072	Vienna Crimes	Due to inconvenience and disruption from construction it would be expected that the Applicant would make a contribution to the local communities affected.
RR-103	Keith Dean	
RR-116	Michelle Juchau	<p>Applicant Response</p> <p>Whether the Proposed Development is liable for community infrastructure levy payments will be determined in accordance with the Community Infrastructure Levy Regulations 2010.</p> <p>Paragraph 3.6.3.17 of Chapter 3 of the ES (APP-118) confirms the Converter Station is designed for unmanned operation, with a small team being responsible for maintenance of plant (typically 3-4 persons). On that basis it is considered the Converter Station is a building into which people only go intermittently for the purpose of inspecting or maintaining fixed plant or machinery and will therefore not constitute development in accordance with how that term is defined by Regulation 6 of the Community Infrastructure Levy Regulations 2010, and therefore would not be liable for CIL payments.</p> <p>The Applicant has proposed measures to mitigate impacts of the Proposed Development which are considered to be of an appropriate scale. It is not considered that a compensation/community fund is required to mitigate the impacts of the Proposed Development and as any such fund would not have a genuine planning purpose it is not to be a material consideration in the determination of the Application.</p>
RR-156	Cllr Matthew Winnington	
RR-159	Cllr Darren Sanders	
RR-043	APLEAL Action Group	
	Template objection letter (see Appendix 2 for list of interested parties)	

5.30. BUSINESS IMPACT

PINS Ref	Respondent	
RR-032	Jane Carter	Summary of Relevant Representation
RR-034	Alistair Thompson	
RR-048	Judith Ann Clementson	Concern over impact of the Proposed Development on businesses.
RR-083	Dawn Gilbert	Applicant Response
RR-110	Louisa Newport	
RR-157	Cllr Jaqueline Porter	
RR-044	Cllr Caroline Brook	
RR-071	Southsea Brewing Co.	
		ES Chapter 25 (Socio-economics) (APP-140) Section 25.7, paragraphs 25.7.2.13 to 25.7.2.26 assesses the impacts of the scheme on local businesses. There are no likely significant residual effects upon local businesses identified (see Section 25.10 Residual Effects).

5.31. HEALTH AND SAFETY

PINS Ref	Respondent	
RR-039	Jeremy Warren	Summary of Relevant Representation
RR-046	Polly Beard	
		The Converter Station, as a potential terrorist target, requires 24-hour security.
		Applicant Response
		The Converter Station will have on-site remote monitoring which will provide 24/7 security. Remotely, the station will be monitored by a control centre using a high speed broadband link. The control centre will diligently check the site and will also be alerted by any unplanned access or movements within the site. Should there be an alarm, there will be an agreed procedure whereby the control centre will notify the relevant authorities and personnel to take appropriate actions. Appropriate security measures will be in place typical for infrastructure of this significance and scale
RR-040	Anne Atkinson	Summary of Relevant Representation
		Plastic/rubber seals degrade over time and any small water ingress/equipment failure in the future could cause a catastrophic fire risk/danger to life.
		Cables would be within the distance of neighbourhood electricity supply guidelines but considered it should be at a distance equivalent to large voltage overhead power lines, not within 10 meters of residential property and under/alongside heavily used roads.
		Applicant Response
		A metallic sheath acts as a moisture barrier, preventing ingress into the electrical core (the conductor and the insulation). This metallic sheath is further protected by an extruded oversheath. For this project the cables will be installed in ducts, providing an additional level of physical

PINS Ref	Respondent	
		security, in addition to the duct surround (a stable, cement-bound material), protective covers and the burial depth (minimum 750mm in roads). Insulated power cables are not subject to the same clearance requirements as overhead lines.
RR-157	Cllr Jaqueline Porter	<p>Summary of Relevant Representation</p> <p>Concern regarding the safety of children travelling to school.</p> <p>The proposed route follows residential streets in Farlington, close to two schools, which is unnecessary.</p> <p>Applicant Response</p> <p>Farlington Avenue falls within the Onshore Cable Corridor. The Framework Traffic Management Strategy (Appendix 22.1A of the ES (APP-449)) mitigates the impacts of the works by taking account of key constraints and sensitive locations along the route and provides an indicative programme for construction that considers school terms and interaction between adjacent or nearby locations.</p>
RR-044	Cllr Caroline Brook	
RR-191	Cllr Simon Boshier	

5.32. CONSULTATION

PINS Ref	Respondent	
RR-034	Alistair Thompson	<p>Summary of Relevant Representation</p> <p>Perceived lack of consultation. The Applicant has failed to meet even the minimum requirement of a very light touch consultation process.</p> <p>Applicant Response</p> <p>The Consultation Report (APP-025) provides the details of the pre-application consultation carried out by the Applicant in compliance with the requirements of the Planning Act 2008.</p> <p>The Applicant notes the comments contained in the Planning Inspectorate's letter of 11 May 2020 (PD-008), confirming that matters relating to pre-application consultation precede and therefore lie outside the remit of the Examination process.</p> <p>Please also see the Applicant's Procedural Deadline B Submission in this regard (Doc Ref 7.9.2).</p>
RR-044	Cllr Caroline Brook	

5.33. LIGHT POLLUTION

PINS Ref	Respondent	
RR-038	Suzanne Crossley	<p>Summary of Relevant Representation</p> <p>Light pollution from Converter Station area needs to be assessed cumulatively alongside the existing Lovedean substation.</p> <p>Applicant Response</p> <p>There will be no permanent lighting associated with the Converter Station. Chapter 3 (Description of the Proposed Development) of the ES (APP-118), paragraph 3.6.3.13 states that the Converter Station will be lit, when necessary, using energy efficient luminaries mounted atop mid-hinged columns to provide ease of maintenance. Lighting columns, up to 15 m high (see items 15 and 16 in Plate 3.7), are proposed to illuminate the outdoor areas of the Converter Station during emergency situations, such as an intruder or unplanned maintenance work. The lights are not intended to be used during normal operation.</p> <p>Measures will be taken to minimise the impact of temporary construction lighting through the design and layout of site construction areas, see paragraph 15.7.1.2 of Chapter 15 (Landscape and Visual Amenity) of the ES (APP-118) and paragraph 1.4.2.7 in the Outline Landscape and Biodiversity Strategy (APP-506), now paragraph 1.5.1.4 in the updated Outline Landscape and Biodiversity Strategy (APP-506 Rev002). The Onshore Outline Construction Environmental Mitigation Plan (OOCEMP) (APP-505) and the updated OOCEMP (APP-506 Rev002) provides at paragraph 5.3.1.1 that construction will be restricted to daylight hours between dawn and dusk for the Converter Station Area during the active bat season (April to October). The updated OOCEMP (APP-505 Rev002) also states at paragraph 5.2.2.1 that the appointed contractor will develop a Lighting Scheme for the Construction and Operational Stages of the Converter Station Area.</p>
RR-039	Jeremy Warren	

5.34. FLOOD RISK

PINS Ref	Respondent	
RR-149	Bernard Johnson	<p>Summary of Relevant Representation</p> <p>Potential flooding from rain run-off from Converter Station area.</p> <p>Applicant Response</p> <p>Surface water runoff generated at the Converter Station is proposed to be managed through an attenuation basin prior to infiltration to the ground, which will mirror the current situation and is in line with the sustainable drainage principles. A drainage strategy has been developed to manage surface water generated from the increase in impermeable land and appropriate control of associated pollution risks, as presented in the Appendix 3.6 (Surface Water Drainage and Aquifer Contamination Mitigation Strategy) of the ES (APP-360). The proposed outline design option has also been considered as part of the wider Flood Risk Assessment (FRA) (Appendix 20.4 of the ES (APP-439)) and Chapter 20 (Surface Water Resources and Flood Risk) of the ES (APP-135) has concluded that no significant effects are anticipated as a consequence of the Proposed Development.</p>

5.35. BREXIT

PINS Ref	Respondent	
RR-046	Polly Beard	<p>Summary of Relevant Representation</p> <p>Uncertainty on relationship with European energy post-Brexit on future relationship and tariffs and raise concern regarding the application for an 'exemption' under Article 17(1) of Regulation (EC)No.714/2009.</p> <p>Applicant Response</p> <p>.</p> <p>The national need for the Proposed Development is considered fully in the Needs and Benefits Report (APP-115) and the Needs and Benefits Addendum Report (Doc ref 7.7.7). The implications of Brexit on the continued operation of all interconnectors in the UK is discussed in Section 3.6 of the Needs and Benefits Report. In this regard, the ExA should note that while the position following the transition period continues to be negotiated, there will still be a fundamental need for more interconnection between the UK and France irrespective of Brexit.</p> <p>The national need for interconnectors is not diminished in any way by Brexit, with increased interconnection capacity continuing to be essential, so as to ensure energy security, affordability, achieve emissions reductions, replace fossil fuel energy generating capacity, support increased supply from renewables and cater for future increases in electricity demand.</p> <p>National policy in relation to electricity interconnectors remains the same at the current time and is not affected by Brexit and is that which is discussed in the previously referred to documents. In context of the need to achieve decarbonisation, it is expected that electricity interconnectors will continue to benefit from positive policy support to assist with achieving net zero carbon emissions by 2050 as is required by the Climate Change Act 2008.</p>
RR-048	Judith Ann Clementson	

5.36. SHIPPING

PINS Ref	Respondent	
RR-050	Patrick Whittle	<p>Summary of Relevant Representation</p> <p>Marine cable will be across an extremely busy shipping channel.</p> <p>Applicant Response</p> <p>The potential impacts on shipping and navigation as a result of the Proposed Development have been fully assessed in Chapter 13 (Shipping, Navigation and Other Marine Users) of the ES (APP-128) that was submitted as part of the Application. Appendix 13.1 (Navigation Risk Assessment) of the ES (APP-393) investigates the potential risk to shipping and navigation interests whilst work is being undertaken within the Traffic Separation Scheme of the Channel. The assessment concludes that effects resulting from the Proposed</p>

PINS Ref	Respondent	
		<p>Development will not be significant and with mitigation measures in place, the risk to shipping and navigation will be as low as reasonably practicable.</p> <p>The assessments and their conclusions have been consulted on with the Maritime and Coastguard Agency, Trinity House, Dover Straits TSS User Group, NAB VTS User Group, QHM Portsmouth and ABP Southampton. In addition, consultation has also been undertaken with the Royal Yachting Association, the Cruising Association as well as many harbours, sailing clubs, angling groups and fishermen within the area.</p>

5.37. CUMULATIVE EFFECTS

PINS Ref	Respondent	
	Template objection letter (see Appendix 2 for list of interested parties)	<p>Summary of Relevant Representation</p> <p>Concerns over the cumulative effects of the Proposed Development with other nearby developments, including highway disruption.</p> <p>Applicant Response</p> <p>The Applicant has assessed committed developments within ES Chapter 29 Cumulative Effects (APP-144), with a summary of all committed onshore developments in table 29.14.</p> <p>With regards to highways, committed developments were assessed as part of the Solent sub-Regional Transport Model (SRTM) modelling which is set out in Section 2.3 of the Appendix B SRTM Coding Note which forms part of ES Appendix 22.1 Transport Assessment (APP-448).</p>
RR-141	Savills on behalf of West Waterlooville Development Ltd / Grainger Plc	<p>Summary of Relevant Representation</p> <p>West Waterlooville Developments Ltd/ Grainger Plc identify land in their control associated with the delivery of the Berewood development comprising 2,550 dwellings which is included in the Order Limits and raise concerns on this prejudicing the delivery of the development.</p> <p>It is requested that construction timeframes are discussed between parties to prevent conflict with the delivery of the Berewood development, specifically so as not to impact the S278 programme (southern junction tied to s106 requirements) or costs and phase 8 (including its temporary access).</p> <p>Note the engagement to date, and continued discussions to safeguard the Berewood development.</p> <p>Applicant Response</p> <p>The Applicant has engaged with Grainger Plc in relation to the Proposed Development since 2018, both in relation to the rights required by the Applicant over land owned by Grainger and the potential programme interfaces between the development of the Applicant's Proposed Development and Grainger's residential developments as part of the West of Waterlooville Major Development Area. The Applicant will continue to engage with Grainger to attempt to secure the rights required and to ensure that any risks from programme interfaces is managed appropriately.</p>

5.38. LAND

PINS Ref	Respondent	
RR-149	Bernard Johnson	Summary of Relevant Representation
RR-173	Keith Coles	Concerns on an increase in the site area since the initial consultation.
		Applicant Response
		The Consultation Report (APP-025) provides the details of the pre-application consultation carried out by the Applicant in compliance with the requirements of the Planning Act 2008. As explained in that report, details of the Proposed Development were consulted on and the Applicant had regard to the feedback received, and the results of technical and environmental investigations, in finalising its proposals.

6. NON-STATUTORY ORGANISATIONS

6.1. SPORT ENGLAND (RR-009)

Theme	Summary of RR
Socio-economic (playing fields and other sports facilities)	Sport England wish to work with the Applicant to understand the impact on sports and recreation provision across the length of the cable route and consider how to minimise and mitigate this impact. Sport England would have particular concerns if the proposal is likely to affect important sites for sport and would wish to avoid the situation where sports clubs and groups are left without facilities to fulfil training and match play requirements.
Applicant's Response	
<p>The Applicant welcome the comments and will continue to work Sports England to further assess the impacts on playing fields and discuss the proposed mitigation. The Applicant hopes to address any concerns and establish an agreed approach through the Statement of Common Ground, to be submitted at the relevant Deadline.</p> <p>Chapter 25 (Socio-economics) of the ES (APP-140), Table 25.15 summarises the anticipated effects on open spaces including playing fields. Mitigation measures identified which are also included in the OOCEMP (APP-505) including consultation with affected groups, use of alternative space, Contractor's review of programme and construction area requirements to reduce effects on open space (Section 25.9.5 of Chapter 25 (Socio-economics)). The Applicant has drafted a Framework Management Plan for Recreational Impacts (Doc Ref 7.8.1.13) to provide an indication of how a Contractor could mitigate impacts on sports pitches through minimising working areas as well as phasing of construction outside of playing seasons where possible. The Applicant is consulting with Sport England on the contents of this document.</p>	

6.2. RWE RENEWABLES UK LIMITED (RR-018)

Theme	Summary of RR
DCO and cumulative assessment	<p>The proposed route for the marine cables of the Aquind Interconnector crosses the proposed Rampion Extension offshore wind farm site and RWE Renewables UK Ltd (RWER) are concerned about a lack of communication or consultation with them. RWER wish to understand any potential impacts / conflicts that may arise to the development, construction and operation of the offshore wind farm as a result of the presence of the Aquind Interconnector. In particular:</p> <ul style="list-style-type: none"> • Any sterilisation of the seabed in respect of structure exclusions; • Any potential limitation on wind farm cables crossing the interconnector; • Potential commercial and legal arrangements for the crossing of the Aquind and offshore wind farm cables • Any impacts on construction due to the presence of the interconnector
Applicant's Response	
<p>With regards to consultation, the Applicant contacted E.ON (the previous promoter of the Rampion Extension offshore wind farm) regarding the s42 consultation in May 2019 and subsequently provided notification of the acceptance of the Application in January 2020. The Applicant understands that E.ON transferred its renewable business (including Rampion Wind Farm and the potential extension project) to RWER in September/October 2019.</p>	

Theme	Summary of RR
	<p>The Applicant has also undertaken extensive engagement with The Crown Estate during the consultation stage. When consulted, The Crown Estate, as part of their conflict checks and investigations on the potential impacts to future resource or other future projects, did not raise any concerns about the Proposed Development. Indeed, the Applicant has a signed Option Agreement and has agreed a draft Licence with The Crown Estate to construct the project.</p> <p>It is important to note that that the Rampion Extension project was not in the public domain when the marine cable corridor for the Proposed Development was being investigated. The Rampion Extension project (now known as Rampion 2) only passed a plan-level HRA undertaken by The Crown Estate in August 2019, and the Applicant understands that the project is still at early stages of development. with very limited details of the project in the public domain.</p> <p>The Applicant has since undertaken a review of the information contained within the Rampion 2 Scoping Report and has also submitted a consultation response on the report to PINS as a Consultation Body under Regulation 11 of the Infrastructure Planning (EIA) Regulations 2017. In undertaking this review and in providing this response, it is evident that the design and timescales of Rampion 2 still remain very much in the early stages. It is likely that the Proposed Development may well have started or completed construction (if DCO award is achieved) by the time Rampion 2 is determined. The Applicant, in meeting their duty under Regulation 11 (3) of the Infrastructure Planning (EIA) Regulations 2017, are happy to continue engagement with Rampion 2 at their request to assist in their information gathering exercise relating to their design evolution and cumulative impact assessments relevant to the preparation of their ES. The Applicant is engaging with RWER about the respective projects and the queries that have been raised within the Relevant Representation and it has been agreed that a SoCG is not required. In the meantime we advise that the information that RWER is likely to require in the first instance in order to understand the potential conflicts that may arise for their development are set out in our Application, most specifically Chapter 3 Description of the Proposed Development within the ES (Ref: APP-118) and its accompanying figures and appendices, and should allow them to consider the Proposed Development as part of their design process. Engagement is ongoing.</p>

6.3. NATIONAL FEDERATION OF FISHERMEN'S ORGANISATIONS (RR-023)

Theme	Summary of RR
Fisheries Liaison and Coexistence Plan	<p>The National Federation of Fishermen's Organisations ('NFFO') recommend that a Fisheries Liaison and Coexistence Plan is produced and secured via the Deemed Marine Licence to cover inter alia how the disruption to fishing activities taking place is to be managed, the approach for managing any necessary gear clearances and disruption during the construction phase and approaches to addressing any maintenance and remediation works occurring during the course of the project.</p>
Applicant's Response	
<p>The Applicant acknowledges that a request for a Fisheries Liaison and Co-existence Plan was made during the Scoping exercise undertaken by the MMO 2018 (under the Marine (Environmental Impact Assessment) Works Regulations 2007 (as amended)) but not when we re-scoped with PINS in December 2019. However, the absence of consideration of a Fisheries and Co-existence Plan within the Application was not purposeful.</p> <p>The Applicant is familiar with the use of Fisheries Liaison and Co-existence Plans in DCOs for offshore wind farms but is not aware of the Plans being used for interconnector cable projects i.e. it is not included in the Viking or IFA2 marine licences. Nevertheless, the Applicant would be pleased to discuss a Fisheries Liaison and Co-existence Plans for the Proposed Development and will continue to engage with the NFFO has agreed to prepare a pre-construction Fisheries Liaison and Co-existence Plan which will be secured via the DML (APP-019, Rev 002) .</p>	
Managing Cable Burial Risk and Fisheries	<p>The National Federation of Fishermen's Organisations recommend that fisheries and gear types in use along the cable corridor should feature in the cable burial risk assessment with respect to the choice of any cable protection deemed necessary and with respect to ongoing monitoring arrangements post-installation. Cable protection should be selected and deployed so that it does not constitute a significant risk to the snagging of fishing gears e.g. through the use of a tapered design in the case of rock berms, and the fishing industry should be consulted on any choice of cable protection e.g. via the inshore fishing working group or other relevant fishing industry stakeholder depending on the location.</p>
Applicant's Response	

Theme	Summary of RR
	<p>The Applicant agrees with the importance of using cable burial risk assessments (CBRA) to inform the requirement for cable protection along the cable route. CBRA approach will be used to inform production of the Cable Burial and Installation Plan as identified in Schedule 15, Pt 2, 4 (c) and the Cable Burial Management Plan in Schedule 15, Pt 2, 11 of the Deemed Marine Licence within the draft DCO (APP-019); the latter will be updated periodically during operation and be informed by cable burial surveys and updated CBRAs.</p> <p>The draft DCO also includes, as acknowledged by NFFO, mitigation measures such as employment of a Fisheries Liaison Officer and regular inshore fisheries working groups as a mechanism to communicate proposals for cable protection measures and allow dialogue to reduce possible conflict with fishing interests. The Applicant has also agreed to update the DML to include provision for a Fisheries Liaison and Co-existence Plan.</p>
DCO	<p>It is suggested the DML condition to notify any detected cable exposure to the fishing industry (DCO Schedule 15 Part 2, Section 2 (12)) should also include the detection of sections of cable that are shallow buried and so at risk of contact with fishing gears. A suggested amendment to the condition is provided.</p>
Applicant's Response	
<p>The Applicant acknowledges the importance of ensuring that the appropriate communication procedures are in place to minimise interactions between the Proposed Development and other marine users including the fishing industry. The Applicant is also currently engaging with the MCA and Trinity House with respect to Schedule 15 Part 2, Section 2 (12) as amendments have been requested from them as Statutory advisors on shipping and navigation.</p> <p>The Applicant would be pleased to discuss this proposed drafting with NFFO in more detail but the initial view is that the proposed amendment to the draft DCO, Schedule 15 Part 2, Section 2 (12) is not the best way to capture the requirement using the specific terminology of 'shallow burial' e.g. what constitutes 'shallow burial' is subjective and should be informed by a CBRA approach. As well as notification licence conditions, other control measures for capturing notifications of potential cable exposures and cable exposures will form part of the Cable Burial Management Plan (Schedule 15, Pt 2, 11) and as part of the Fisheries and Co-Existence Plan.</p> <p>The Applicant is also engaging with the Maritime and Coastguard Agency and Trinity House on securing the correct wording within this condition to ensure that industry standard safe working practices are being captured.</p> <p>As well as notification licence conditions, other control measures for capturing notifications of potential cable exposures and cable exposures will form part of the Cable Burial Management Plan (Schedule 15, Pt 2, 11) and potentially as part of a Fisheries and Co-Existence Plan.</p>	

6.4. CPRE HAMPSHIRE (RR-028)

Theme	Summary of RR
Policy	<p>The Proposed Development would have impacts on the National Park, and thus requires regard to the purposes of the SDNP as per EN1 paragraph 5.9.12 and S62 of the Environment Act 1995. It is unclear how this duty has been met.</p>
Applicant's Response	
<p>Chapter 2 (Consideration of Alternatives) of the ES (APP-117) and the Supplementary Alternatives Chapter submitted as part of the Environmental Statement Addendum (doc ref 7.8.1) provides an assessment of the reasonable alternative options considered for the Proposed Development, including in respect of the grid connection point and the location of the Converter Station in proximity to Lovedean Substation, and considerations relevant to potential impacts on SDNP.</p>	

Theme	Summary of RR
	<p>Whilst it was noted there was the potential for impacts on the SDNP it is not considered that the proposals for the development of an interconnector connecting at Lovedean Substation conflict with the purposes of the National Park. For this reason whilst the impacts on the SDNP were considered by the Applicant when determining the suitability of a connection to Lovedean substation and whether it was the preferred option, no greater weighting was needed to be attached to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area comprised in the national park, as would have been required in accordance with subsection (1) of section five to the National Parks and Access to the Countryside Act 1949 where a conflict with those purposes did arise.</p>
Landscape	<p>Concerns are raised about the scale, height and width of the proposed Converter Station with a utilitarian appearance which would cause significant harm to the setting of the SDNP.</p> <p>Consider the ability of the landscape to absorb change cannot apply to buildings of this scale. Views from elevated positions within the SDNP, and notably the Monarchs Way would be significantly adverse and would change from an essentially rural character to an industrial one.</p> <p>Advise of potential cumulative impacts with a proposed battery storage site, solar farm and extension to the substation.</p> <p>Consider the mitigation proposed would not reduce impact as suggested.</p>
Applicant's Response	
<p>Chapter 15 (Landscape and Visual Amenity) of the ES (APP-130) concludes that there would be:</p> <ul style="list-style-type: none"> • Indirect, moderate adverse temporary effects on the setting of the SDNP during construction (paragraph 15.8.3.4) • Indirect moderate-major to major adverse effects on the setting of the SDNP during operation in Year 0 (paragraph 15.8.4.2) which by Year 20 based on the maturation of mitigation planting would decrease to minor adverse (not significant) effects (paragraph 15.8.4.7). • Indirect minor-moderate adverse (significant) effects on the setting of the SDNP during decommissioning based on inter visibility and changes within a localised area (paragraph 15.8.5.3). <p>Appendix 15.8 (Landscape and Visual Effects) (APP- 406) recognises that some receptors within 3 km of the Converter Station will experience significant adverse visual effects and this includes views experienced by recreational receptors from elevated positions within the SDNP as reflected in Figure 15.46 Recreational and Transport Routes Converter Station (3 km) (APP-279).</p> <p>As set of design principles (including general, building design and landscape principles) has been established, through consultation with WCC, EHDC and SDNPA which will dictate the requirements for the final design and these are referred to in Section 6 of the DAS (APP- 114), The Building Design Principles explain how different functions should be rationalised into simple building forms, which seeks to avoid visual clutter from several different sized buildings with the proposed cladding consisting narrow vertical elements to break up the overall mass and curved corners will be incorporated where practicable to soften the building forms. In addition, the Converter Station is supported by an Outline Landscape and Biodiversity Strategy and supporting figures (APP-506), now the updated Outline Landscape and Biodiversity Strategy (APP-506 Rev002) which seek to maintain existing hedgerows / hedgerow trees within the Order Limits in perpetuity on the basis that the existing vegetation already forms an important screen function.</p> <p>With regards to cumulative impact of the Proposed Development this is assessed in ES Chapter 29 Cumulative Effects (APP-144), with regards to the Lovedean Substation extension, the extension and proposals to install a 30 m telecommunication mast and antenna was considered as part of the future baseline as detailed in paragraph 15.5.4.2, 15.5.4.6 and 15.5.4.7 ES Chapter 15 Landscape and Visual Amenity (APP-130).</p> <p>The battery storage site planning application was withdrawn but is assessed in Table 29.14 of ES Chapter 29 (Cumulative Effects) and concludes a localised moderate adverse (significant) impact. There is no current planning application submitted for a proposed for a solar farm in the locality.</p>	
Noise	<p>Noise from operation of the Converter Station is also a serious concern regarding its impact on the enjoyment of the countryside by the public and consider it contrary to local planning policies.</p>

Theme	Summary of RR
Applicant's Response	
<p>The results of the operational noise assessment for the Converter Station are, presented at Paragraphs 24.6.2.15 to 24.6.2.24 of ES Chapter 24 (Noise and Vibration) of the ES (APP-139), as amended by section 17.2 of the ES Addendum (document reference 7.8.1). which concludes that With the inclusion of embedded and additional mitigation measures (Paragraphs 24.6.1.11 to 24.6.1.13 and 24.8.1.1 to 24.8.1.4), the operational noise effects of the Converter Station are expected to be negligible (not significant).The measures included to mitigate the noise from the Converter Station include the layout and orientation of the buildings/equipment and mitigation applied to individual equipment items (for example enclosures or silencers).</p> <p>The control of operational noise from the Converter Station will be secured through the adoption of broadband and octave band noise criteria (see the Operational Broadband and Octave Band Noise Criteria Document (document reference 7.7.11)). Broadband noise is the overall noise level and octave band noise is noise across different frequencies. The noise criteria have been determined using the principles of British Standard 4142:2014+A1:2019 (Methods for rating and assessing industrial and commercial sound). These noise criteria will ensure that the operational noise levels from the Converter Station are negligible, as concluded in Chapter 24 of the ES (APP-139).</p>	
Converter Station Location	<p>The Converter Station location is almost surrounded by the SDNP within fine East Hampshire countryside and does not accord with national or local planning policy, being an inappropriate location despite the benefits available from connecting to the Lovedean substation.</p> <p>If buildings of this size are essential in technical terms, then another and more urban site needs to be found.</p>
Applicant's Response	
<p>Chapter 2 (Consideration of Alternatives) of the ES (APP-117) and the Supplementary Alternatives Chapter submitted as part of the Environmental Statement Addendum (doc ref 7.8.1) provides an assessment of the reasonable alternative options considered for the Proposed Development, including in respect of the grid connection point and the location of the Converter Station in proximity to Lovedean Substation, and considerations relevant to potential impacts on SDNP.</p> <p>Whilst it was noted there was the potential for impacts on the SDNP it was not considered that the proposals for the development of an interconnector connecting at Lovedean Substation would conflict with the purposes of the National Park. For this reason whilst the impacts on the SDNP were considered by the Applicant when determining the suitability of a connection to Lovedean substation and whether it was the preferred option, no greater weighting was needed to be attached to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area comprised in the National Park, as would have been required in accordance with subsection (1) of section five to the National Parks and Access to the Countryside Act (1949) where a conflict with those purposes did arise.</p> <p>The assessment of compliance of the Proposed Development with planning policy is provided in the Planning Statement (APP-108).</p>	

6.5. EVERSHEDES SUTHERLAND (INTERNATIONAL) LLP ON BEHALF OF NATIONAL GRID ELETRICITY TRANSMISSION PLC AND NATIONAL GRID GAS PLC (RR-030, RR-031)

Theme	Summary of RR
DCO	<p>National Grid submitted relevant representation in order to protect its position in relation to infrastructure and land which is within or in close proximity to the proposed Order limits. National Grid's rights to retain its apparatus in situ and rights of access to inspect, maintain, renew and repair such apparatus located within or in close proximity to the Order limits should be maintained at all times and access to inspect and maintain such apparatus must not be restricted. National Grid will require protective provisions to be included within the proposed Order to ensure that its interests are adequately protected and to ensure compliance with relevant safety standards.</p>
Applicant's Response	

The Applicant is currently engaged with National Grid to secure what is necessary for National Grid in relation to the Proposed Development and will report to the Examining Authority the outcome of discussions in due course, or the latest position where requested to do so.

6.6. UNIVERSITY OF PORTSMOUTH (RR-047)

Theme	Summary of RR
Land / CPO	<p>The University of Portsmouth consider that the Proposed Development could have significant impacts on land and properties belonging to the University, with disruption to facilities to students, in particular sports.</p> <p>Impacts identified on the University's future development plans, with land impacted by the cable route rendering it unsuitable for development in the manner anticipated resulting in financial loss.</p>
Applicant's Response	
<p>The Applicant acknowledges the concerns which have previously been discussed with the University. Despite a request for visibility of the proposed future development areas, no information has been forthcoming. As a result, the Applicant has avoided previously developed areas of the Langstone Campus and routed the Order Limits to the edge of the University ownership to seek to reduce potential conflicts.</p> <p>A Framework Management Plan for Recreational Impacts has been developed to demonstrate how effects on recreational effects could be reduced using the principles of mitigation set out in the ES (doc ref 7.8.1), this includes the University of Portsmouth Playing Fields.</p>	

6.7. HAVANT FRIENDS OF THE EARTH (RR-057)

Theme	Summary of RR
Need (Energy Security)	<p>Havant Friends of the Earth support the Project's ability to facilitate a transition to more renewable sources of energy and provision of greater energy security in the UK is supported. However, disappointment is expressed at France's high dependence on nuclear generation.</p>
Applicant's Response	
<p>The Applicant welcomes the support of Havant Friends of the Earth and the recognition of the benefit of interconnectors in providing greater energy security.</p> <p>The comment on nuclear generation within France is noted.</p>	
Ecology	<p>Havant Friends of the Earth consider that any work adjacent to Langstone Harbour and Farlington Playing Fields should take place between April and September to minimise disturbance to brent geese and waders.</p>
Applicant's Response	
<p>The potential effects of the Construction Stage on Chichester, Farlington and Langstone Harbour SPA and the wintering intertidal bird community has been examined carefully and mitigation measures have been identified throughout the ES to address this issue. Effects will be avoided by restricting works within the winter season, defined as October to March (the period when SPA birds such as brent geese arrive from their breeding grounds). Details of the working restriction are provided in ES Appendix 16.14 (Winter Working Restriction for Features of Chichester & Langstone Harbours SPA) (APP-422).</p>	

Theme	Summary of RR
Environment and Groundwater	<p>Havant Friends of the Earth express concerns regarding the potential environmental impact of the converter station location and its approaches through Denmead. Proposals to use horizontal directional drilling under Denmead meadows and Kings Pond are considered to be superficially less damaging to the site, however, the risks to the underlying Aquifer Source Protection Zone which may impact on public water supplies at Bedhampton Springs are noted.</p>
Applicant's Response	
<p>The Applicant notes these concerns. Chapter 16 (Onshore Ecology) (APP-131) of the ES assesses impacts on ecological features of the Converter Station and within Denmead Meadows. The assessment concludes that with mitigation there will be no residual adverse effects on ecological features at the converter station or Denmead Meadows.</p> <p>The risks to the Aquifer and associated impact on Bedhampton Springs are mitigated through the Surface Water Drainage and Aquifer Contamination Mitigation Strategy, forming Appendix 3.6 to the ES (APP-360) and is included within the updated OOCEMP which is secured by Requirement 15 of the dDCO.</p>	
Landscaping	<p>Planting of trees, hedges and wildflowers, as mitigation to screen the Converter Station is welcomed, but the removal of existing trees and hedgerows should be kept to a minimum.</p>
Applicant's Response	
<p>The support for the landscaping proposals is welcomed. ES Chapter 15 (Landscape and Visual Amenity) and Outline Landscape and Biodiversity Strategy (APP-130 and APP-506 respectively, the latter updated APP506 Rev002) provide confirmation on the Applicants proposal to retain existing trees and hedgerows where practicable as reflected in the Onshore Outline Construction Environmental Management Plan (APP-505).</p>	
Noise	<p>Concerns are expressed regarding the potential noise and disturbance impacts of construction stage at the Converter Station site.</p> <p>Request operational noise levels be kept to the minimum with the maximum use of acoustic barriers.</p>
Applicant's Response	
<p>The noise and vibration assessment can be found in Chapter 24 (Noise and Vibration) of the ES (APP-139), as amended by section 17.2 of the ES Addendum (document reference 7.8.1).</p> <p>Noise disturbance from the Converter Station has been considered in relation to both human and biodiversity receptors in Chapters 24 (Noise and Vibration) (APP-139) and 16 (Onshore Ecology) (APP-131) respectively. The predicted Converter Station construction noise impacts effects at the residential receptors, assessed against the worst-case noise levels, were all found to be, at worst, a negligible minor adverse (not significant).magnitude of impact.</p> <p>Following the inclusion of embedded mitigation measures (paragraphs 24.6.1.11 to 24.6.1.13 of Chapter 24), and additional mitigation measures (paragraphs 24.8.1.1 to 24.8.1.4 of Chapter 24), the operational noise effects of the Converter Station are expected to be negligible (not significant).</p> <p>The measures to mitigate operational noise from the Converter Station include consideration of layout and orientation of the buildings and external equipment. This enables the Converter Station buildings to provide a screen between the external noise producing equipment and the nearest noise sensitive receptors. Mitigation has also been focussed on treating individual equipment items at source (for example with enclosures or silencers). These have been calculated as being the most effective methods for mitigating Converter Station noise.</p> <p>The control of operational noise from the Converter Station will be secured through the adoption of broadband and octave band noise criteria (see the Operational Broadband and Octave Band Noise Criteria Document (document reference 7.7.11)). Broadband noise is the overall noise level and octave band noise is noise across different frequencies. The noise criteria have been determined using the principles of British Standard 4142:2014+A1:2019 (Methods for rating and assessing industrial and commercial sound). These noise criteria will ensure that the operational noise levels from the Converter Station are negligible, as concluded in Chapter 24 of the ES (APP-139).</p>	
Alternatives	<p>It is considered that the landfall at Eastney and the cable route will cause disruption to people and traffic (even if only temporary) and the representation questions whether a less disruptive landfall option exists, including whether the IFA2 route and Converter Station location could be used.</p>

Theme	Summary of RR
Applicant's Response	
The Alternatives considered in ES Chapter 2 (Consideration of Alternatives) (APP-117) and includes an assessment of alternative landfall locations. The IFA2 landfall was based on its allocated grid connection point at Chilling. Whilst a landfall at Lee-on-Solent was considered with regards to the Proposed Development, it was subsequently discounted as identified in section 2.4.9 of ES Chapter 2.	

6.8. PORTSMOUTH DIVISIONAL FOOTBALL ASSOCIATION (RR-064)

Theme	Summary of RR
Socio-economic (sports provision)	Portsmouth Divisional Football Association object to the application on the basis of the potential impacts the local sporting community, in particular football. Specific concerns relate to the length of disruption at the playing fields at Bransbury Park, Langstone Harbour and Farlington and the lack of measures to mitigate the temporary loss of these pitches. Finally, it is considered that the Applicant failed to engage with the local ground and Portsmouth City Council.
Applicant's Response	
Portsmouth Divisional Football Association's objections are noted. In light of the comments it was considered that further work would be necessary in order to evaluate the potential impacts, improvements to communication and the potential for further mitigation. A Framework Management Plan for Recreational Impacts (doc ref: 7.8.1.13) has been developed to demonstrate how effects on recreational effects could be reduced using the principles of mitigation set out in the ES, this includes the football pitches at Bransbury Park and Farlington Playing Fields.	

6.9. STANTEC ON BEHALF OF INVESTIN PORTSMOUTH LTD (RR-098)

Theme	Summary of RR
Land	Investin Portsmouth submit a holding objection and raise a series of questions related to the timing, nature and proximity of Aquind's works in relation to the proposed Fraser Range development site. Clarification is sought on the following land matters:

Theme	Summary of RR
	<ul style="list-style-type: none"> • Requirement of an area of land (easement on the beach) which is in the control of Fraser Range. • Impact of the new cable in crossing the current access to Fraser Range (to be widened and upgraded with a new footpath/cycle way, and car park area alterations) and an overlap with the Aquind Compound. • The SINC (nature area) next to the car park is due to be enhanced by the Fraser Range proposals as such will be impacted by the compound and operations (concern on additional land for construction). • Construction timeline of both projects requires coordination of works (Aquind HDD, Fraser Range road widening and new utilities) • Request clarity on future legal status of the easement area on the beach as Fraser Range needs to retain access to the beach for sea wall works and future public access • Clarity on structures/landscaping/drainage etc. • Why does easement flare given cable line is at 90 degrees to shore, clarification is required?
Applicant's Response	
<p>The Applicant is in discussions with the landowner with regards to the potential impacts on land within its control.</p> <p>The Marine Cable Corridor runs from the UK/France Exclusive Economic Zone boundary to Mean High Water Springs below the Landfall, where the Marine Cables are jointed to the Onshore Cables. The cables will be installed under the intertidal area, including Eastney Beach, using HDD. The HDD is anticipated to comprise four bores, each approximately 1,400 to 2,000 m in length between the car park off Fort Cumberland Road and a point off-shore. The minimum and maximum depths will typically be up to 20 m, depending upon the length of the bore and the local ground conditions, with bores separated up to 20 m apart. As a result, the Applicant has a requirement for an easement for the Onshore Cable Route under the beach in the area owned by Investin Portsmouth Limited.</p> <p>The Order Limits do not extend into the SINC to the east of the Fort Cumberland Road car park, and no works are proposed to this area of land with all construction compounds to be located within the car park itself. Permanent works in the vicinity of the landfall will include underground cables and Optical Regeneration Stations, which will be sited within the Order Limits.</p> <p>Section 3.4.1.6 of ES Chapter 3 Description of the Proposed Development (APP-118) states "In certain areas, where Horizontal Direction Drilling and other Trenchless techniques are to be used to install the Onshore Cables or where the Onshore Cables connect to the Marine Cables, a wider limit of deviation is provided to ensure the full extent of the area beneath the surface where the Cables may be located is identified". The 'flare in the Order Limits in this area reflects this principle reflecting good engineering risk management practice. It should be noted that in this area the cables will be installed at depth and will not impact the surface of the land.</p>	
Cumulative impacts (including noise and vibration)	<p>Note their existing agreement with Natural England and PCC regarding works required in the SINC and on site, and what has been agreed by Aquind and any potential risk of delay to Fraser Range.</p> <p>Question if cumulative effects have been discussed with Natural England? And if there has been a cumulative assessment of the potential noise and vibration impacts.</p>
Applicant's Response	
<p>The Applicant has consulted with Natural England in terms of cumulative effects and provided direction to Chapter 16 (Onshore Ecology) of the ES (APP-131). Mitigation has been provided within the Order Limits to offset impacts of the Optical Regeneration Stations (ORS) and the assessment within ES Chapter 29 Cumulative Effects (APP-144) concluded there were no cumulative impacts with the Fraser Range Development.</p>	

Theme	Summary of RR
	<p>The noise and vibration assessment can be found in ES Chapter 24 (Noise and Vibration) (APP-139).</p> <p>The results of the vibration assessment for Section 10 (i.e. the area in which the Fraser Range development is situated) are presented in paragraphs 24.6.11.12 to 24.6.11.23 of ES Chapter 24 and identify no significant adverse effects. Details of the construction stage vibration methodology are presented in Section 24.4.3 of ES Chapter 24, with paragraph 24.7.2.1 concluding that that no other developments were identified for consideration in the construction stage cumulative effects assessment, because effects are generally short in duration and therefore unlikely to result in significant cumulative effects.</p>
Noise & Vibration	Clarification of exact methodology and timing of earth works requested.
Applicant's Response	<p>Piling techniques/methodologies are proprietary systems and as such exact methodology and plant specifications will vary from piling contractor to piling contractor. However, a number of techniques, specialist plant and mitigation measures are existing to limit/control noise and vibration. At detailed design the designer/contractor shall produce a Piling Risk Assessment which will outline piling methodology, specify piling plant (including noise and vibration levels). It will also detail any noise or vibration monitoring points to be installed at any sensitive receptors, along with any action levels and mitigations measures to be undertaken.</p> <p>This piling risk assessment along with methodology shall be agreed with key stakeholders prior to construction and during detailed design.</p>

Appendix 1 – LIST OF INTERESTED PARTIES

RR number	Name/Organisation
RR-001	Irene Jay
RR-002	Peter Evans
RR-003	Corporation of Trinity House
RR-004	Hambledon Parish Council
RR-005	Portsmouth Water Ltd
RR-006	James Veryard
RR-007	John Cross
RR-008	Jackie Stevens
RR-009	Sport England
RR-010	Elaine Husselby
RR-011	Associated British Ports
RR-012	Addleshaw Goddard LLP on behalf of Southern Gas Network Plc
RR-013	Martin Farrelly
RR-014	Andy Parks
RR-015	Barry Scott
RR-016	Michael Johnson
RR-017	Brenda Lock
RR-018	RWE Renewables UK
RR-019	Brian Hill
RR-020	Eastleigh Borough Council
RR-021	National Federation of Fishermen
RR-022	Louise Baker

RR number	Name/Organisation
RR-023	The Parish Council of Newlands
RR-024	Susan Cox
RR-025	Guy Shepherd
RR-026	Joint Nature Conservation Committee
RR-027	Karen Holden-Craufurd
RR-028	CPRE Hampshire
RR-029	David Jeffery
RR-030	Eversheds Sutherland (International) LLP on behalf of National Grid Electricity Transmission Plc
RR-031	Eversheds Sutherland (International) LLP (Clare Shaw-Carter) on behalf of National Grid Gas Plc
RR-032	Jane Carter
RR-033	Peter Crockett
RR-034	Alistair Thompson
RR-035	Horndean Parish Council
RR-036	N Craise
RR-037	The Crown Estate
RR-038	Susan Crossley
RR-039	Jeremy Warren
RR-040	Anne Atkinson
RR-041	J R Sykes Farms
RR-042	Veronica Knight
RR-043	APLEAL Action Group
RR-044	Cllr Caroline Brook on behalf of Denmead and Newlands Residents

RR number	Name/Organisation
RR-045	Patricia Conran
RR-046	Polly Beard
RR-047	University of Portsmouth
RR-048	Judith Ann Clementson
RR-049	South Downs National Park Authority
RR-050	Patrick Whittle
RR-051	Cynthia Whittle
RR-052	Denmead Parish Council
RR-053	Hannah West
RR-054	Peter Carpenter and Dawn Carpenter
RR-055	Blake Morgan LLP on behalf of The Owners of Little Denmead Farm
RR-056	Andrew Rowley
RR-057	Havant Friends of the Earth
RR-058	Tracey Bottrell
RR-059	Alison Bee
RR-060	Clara Allansson
RR-061	Ingie Porteous
RR-062	Kimberly Barrett
RR-063	Matthew Wright
RR-064	Portsmouth Divisional Football Association
RR-065	Public Health England
RR-066	Richard Salt
RR-067	Blake Morgan LLP on behalf of Robin Jefferies

RR number	Name/Organisation
RR-068	Simone Taylor-Gray
RR-069	Sue Gosham
RR-070	Blake Morgan LLP on behalf of The Owners of Hill crest
RR-071	The Southsea Brewing Co.
RR-072	Vienna Crimes
RR-073	Allison Udy
RR-074	Ann Farrelly
RR-075	Annette Sartori
RR-076	Charlotte Smith
RR-077	Charlotte Wright
RR-078	Christopher Jones
RR-079	Clare Ash
RR-080	Dan Brookes
RR-081	Danielle Preston
RR-082	David Jordan
RR-083	Dawn Gilbert
RR-084	Deborah Cutler
RR-085	Debra Wallace
RR-086	Diane Roberts
RR-087	Ed Waller
RR-088	Elizabeth Doyle
RR-089	First Hampshire Dorset and Berkshire
RR-090	Georgina Butt

RR number	Name/Organisation
RR-091	Gp Capt S A Hickey OBE
RR-092	Graham O'Neil
RR-093	Hampshire County Council
RR-094	Havant Borough Council
RR-095	Helen Shortall
RR-096	Highways England
RR-097	Ian Daye
RR-098	Stantec on behalf of Investin Portsmouth Ltd
RR-099	James Baker
RR-100	Jim Roberts
RR-101	Katrina Corby
RR-102	Keith Baker
RR-103	Keith Dean
RR-104	Kelly Martin
RR-105	Kelvin Pyne
RR-106	Kirstin Knowlson-Clark
RR-107	Linda Williams
RR-108	Lois Marshall
RR-109	Lorraine Willis
RR-110	Louisa Newport
RR-111	Lynn Mills
RR-112	Lynne Lush
RR-113	Lynsey Christopher

RR number	Name/Organisation
RR-114	Maritime and Coastguard Agency
RR-115	Mark Lacey
RR-116	Michelle Juchau
RR-117	Ke Sikora
RR-118	Judith Webberley
RR-119	Julie Grove
RR-120	S Bagnall
RR-121	Neil Hawkins
RR-122	P J Martin
RR-123	Pam Wilkie
RR-124	Patrick O’Gorman
RR-125	Paul Wright
RR-126	Peter Handley
RR-127	Peter James
RR-128	Rachel James
RR-129	Rachel Norris
RR-130	Richard Rogers
RR-131	Robert Walden
RR-132	Scott Toman
RR-133	Shaun Nightingale
RR-134	Sheila Roy
RR-135	Sylvia Holdforth
RR-136	Tracy Barker

RR number	Name/Organisation
RR-137	Tracy Smith
RR-138	Trevor Clifton
RR-139	Trudy Farley
RR-140	Victoria Campbell
RR-141	Savills on behalf of West Waterlooville Development Ltd/Grainger Plc
RR-142	Alida Clifton
RR-143	Alison Gregory
RR-144	Amanda Whiteland-Smith
RR-145	Andrea Fay Smith
RR-146	Angela Herring
RR-147	Anna Carter
RR-148	David Lock Associates on behalf of Atlas Hotels
RR-149	Bernard Johnson
RR-150	Bruce Graham
RR-151	Carol Tarr
RR-152	Chris Seaton
RR-153	Christian Hannam
RR-154	Christopher Burrowes
RR-155	Claire Brookes
RR-156	Cllr Matthew Winnington
RR-157	Councillor Jacqueline Porter
RR-158	Dana Bubenickova
RR-159	Darren Sanders

RR number	Name/Organisation
RR-160	David Bailey
RR-161	Defence Infrastructure Organisation
RR-162	East Hampshire District Council
RR-163	Eastney Area Community Association
RR-164	Eastney Community Centre
RR-165	Environment Agency
RR-166	Hannah-Payne-Cook
RR-167	Ian Cleugh
RR-168	Ian Judd and Partners
RR-169	Ian Perryman
RR-170	Jan Leonard
RR-171	John Townsend
RR-172	Judith Jewitt
RR-173	Keith Coles
RR-174	Leonard Sirett
RR-175	Linda Hewett
RR-176	Lorna Wilkinson
RR-177	Luke Stubbs
RR-178	Malcolm Smith
RR-179	Marine Management Organisation
RR-180	Milton Neighbourhood Planning Forum
RR-181	Natural England
RR-182	Dentons UK and Middle East LLP on behalf of Network Rail Infrastructure Limited

RR number	Name/Organisation
RR-183	Nick Bertenshaw
RR-184	Peter Hicks
RR-185	Portsmouth City Council
RR-186	Rachel Dawson
RR-187	Rosemary Sirett
RR-188	Ruth Taylor
RR-189	Sally Englefield
RR-190	Shelagh Simmons
RR-191	Simon Bosher
RR-192	Marta Karpezo on behalf of Southern Water Services Ltd
RR-193	Terence Garnett
RR-194	Ian Judd and Partners on behalf of The Landowners of land at []
RR-195	Ian Judd and Partners on behalf of The Owners of Land at [] Joseph Tee, Kathryn Moor
RR-196	Timothy Brown
RR-197	Viola Langley
RR-198	Winchester City Council
RR-199	Historic England
AS-020	Sally Carter
AS-021	Karen Griffiths
AS-022	Martin Lock
AS-023	Ray Willis

Appendix 2 – Template Objection Letter – list of Interested Parties who submitted this template objection

PINS Ref	Interested Party
RR-060	Clara Allansson
RR-062	Kimberly Barrett
RR-076	Charlotte Smith
RR-077	Charlotte Wright
RR-081	Danielle Preston
RR-086	Diane Roberts
RR-095	Helen Shortall
RR-100	Jim Roberts
RR-101	Katrina Corby
RR-112	Lynne Lush
RR-124	Patrick O'Gorman
RR-129	Rachel Norris
RR-154	Christopher Burrowes
RR-155	Claire Brookes
RR-175	Linda Hewett
RR-190	Shelagh Simmons
AS-023	Ray Willis

