

<b>1. Miscellaneous and General</b>			
<b>Reference</b>	<b>Respondent(s)</b>	<b>Question</b>	<b>Local Authority response</b>
MG1.1.5	The Applicant Local planning authorities	The Consultation Report [APP-025] describes a great deal of discussion and progress with a range of interested planning authorities on the concept design of the Converter Station buildings. What certainty does each of the local authorities have that its views and the agreements that have been made with them would be incorporated into the final design?	Havant Borough Council will not be commenting on matters relating to the convertor station. We are aware that our neighbouring Authorities, comprising Winchester, East Hampshire and South Downs National Park will be commenting on these matters.
<b>3. Cultural Heritage</b>			
CH1.4.4	The Applicant Historic England Relevant local authorities	For Section 1 of the Proposed Development (from ES paragraph 21.6.4.5 [APP136]), the assessment of effects on the settings of assets appears to focus exclusively on views, and relies, in some cases, on established or proposed planting to mitigate effects. Could the Applicant, Historic England and the relevant local authorities comment on the adequacy of this, or whether other factors that contribute to setting should have been considered.  To what extent should the ExA and Secretary of State take established vegetation and proposed mitigation planting into account in the assessment of setting?	Havant Borough Council will not be commenting on matters relating to the convertor station. We are aware that our neighbouring Authorities, comprising Winchester, East Hampshire and South Downs National Park will be commenting on these matters.
<b>5. Draft Development Consent Order</b>			
DCO1.5.1	The applicant	Explain in greater detail the technical and environmental reasons why Hayling Island was discounted as an alternative landfall and cable route option for the Proposed Development when it appears to share largely	Whilst HBC acknowledge that this is a question for the applicant, we would comment that Havant Borough council share the views of Hampshire County Council that we wish to raise that we have serious concerns

		<p>similar natural constraints with the selected route to Eastney (paragraph 2.4.11.14 of ES Chapter 2, Consideration of Alternatives [APP-117]). With reference to paragraph 2.4.3.8 and Table 2.3 of ES Chapter 2 [APP-117], please explain in more detail how the decision to choose Eastney as the landfall was reached on the basis of a site visit. What factors made Eastney a more viable option than the other beaches studied? Were impacts on the human population and traffic flows part of the optioneering process, including the discounting of Hayling Island during the assessment of alternatives? If so, please provide evidence. In paragraph 2.4.11.14 of the ES [APP-117], a number of reasons for excluding the cable route option through Hayling Island are listed. Expand on each of these reasons giving comparative explanation as to why such factors were or were not considered prohibitive. Was a comparison made between the ability to HDD between the two islands (Portsea and Hayling) and the mainland? If so, what was the comparative outcome. If not, why not?</p>	<p>about the principle of using Hayling Island as an alternative landing point for the AQUIND cable route, particularly if it were to impact on the A3023. Hayling Island is restricted to one road on and off the island (the A3023) and any disruption or severance along this route would create significant traffic delays for motorists, emergency services and the wider community. Given the extremely sensitive nature of the A3023, all planned highway works on the A3023 can only be undertaken between October and March, maintaining a single lane of traffic at all times (as a minimum) and must be done at night. Any significant works would cause delays both on the island and the mainland as traffic blocks back along the Hayling bridge onto the A27 Langstone Junction, strategic road network and through Havant town centre.</p>
DCO1.5.9	The Applicant Local planning authorities	<p>In Article 42 of the dDCO [APP-019], is the precision around TPOs sufficient? (TPO plans [APP-018] and Schedule 11 refer.) The Applicant seeks powers over any tree in the Order limits rather than providing a schedule (as per model provisions and as is usual in other recently made DCOs). Schedule 11 of the dDCO [APP-019] (TPO trees) only lists 'potential removal' and 'indicative works to be carried</p>	<p>The element of the proposal within Havant Borough Council relates to the cabling underneath the A3 and Hambledon Road. Any impact on tree will be those within the highway boundary, and we are aware that Hampshire County Council will be responding in this regard.</p>

		<p>out'. How can this be specific enough to understand the impact of the Proposed Development on trees? If this remains unchanged, should the ExA in weighing the benefits and disbenefits of the Proposed Development therefore assume the loss all of the trees within the Order limits during construction and throughout the lifetime of the Proposed Development, given that 42(2)(b) of the dDCO [APP-018] removes any duty to replace lost trees?</p>	
DCO1.5.17	The Applicant Local planning authorities	In dDCO [APP-019] draft Requirement 14, a Written Scheme of Investigation is needed for activities prior to commencement of works including onshore site preparation works, but the definition of 'commence' in Article 2 does not identify this exclusion. Is this satisfactory or is an amendment required?	Arkeological matters are dealt with under the remit of Hampshire County Council, and as such HCC will be commenting on this matter
DCO1.5.42	Local planning authorities	A number of Articles in the dDCO [APP-019] contain provisions deeming consent to have been granted in the absence of a response from the consenting authority. Are the local planning authorities content with the provisions and the responsibilities on them as the relevant consenting authority?	HBC would for the purposes of clarity and consistency request that all determination timelines are the same, to avoid any unnecessary confusion about consultees.
DCO1.5.44	The Applicant Relevant local planning authorities	Could the Applicant and the local planning authorities please review the definitions of 'commence' and 'onshore site preparation works' set out In Article 2(1) of the dDCO [APP-019]? A number of site preparations are listed to be excluded from the definition of commencement. Does the Applicant believe that these definitions in Article 2 of the dDCO would allow such site preparation	<p>The definitions of commence in Article 2(1) allows the following works to be undertaken before commencement:</p> <ul style="list-style-type: none"> <li>(c) pre-construction archaeological investigations,</li> <li>(d) environmental surveys and monitoring</li> <li>(e) site clearance,</li> <li>(f) removal of hedgerows, trees and shrubs</li> </ul>

		<p>works to be carried out in advance of the choice of Converter Station option, and the discharge of Requirements, including approval of the CEMP, the landscape and biodiversity mitigation schemes and the surface water drainage system? On what basis does the Applicant believe this is acceptable?</p> <p>Does the Applicant believe that the onshore site preparation works include the creation of site accesses, and, if so, would this conflict with the need for design approval of 'vehicular access, parking and circulation areas' for Works 2 and 5 in Article 6 and Requirement 10?</p> <p>The definition of 'onshore site preparation works' includes 'diversion or laying of services', while Requirement 13 (contaminated land and groundwater) does not include an exclusion from the preparation works similar to the one in Requirement 14(2). Does the Applicant believe that intrusive works such as the laying of services could be carried out on any contaminated land before a management scheme has been agreed?</p> <p>If so, is this acceptable? Should Requirement 13 include similar wording to Requirement 14(2)?</p> <p>Also, could the Applicant provide a detailed explanation as to why each of the elements of onshore site preparations works are excluded from the definition of</p>	<p>(g) investigations for the purpose of assessing ground conditions (h) diversion or laying of services (i) remedial work in respect of any contamination or adverse ground conditions; (j) receipt and erection of construction plant and equipment (k) creation of site accesses (l) the temporary display of site notices and advertisements; and (m) erection of temporary buildings, structures or enclosures.</p> <p>Using the word commencement as the trigger point allows significant work to have already been undertaken before the Local Planning Authority get a chance to see any details is not acceptable.</p> <p>The applicant with need to refine the definition of commencement or use a totally different trigger for some of the Requirements, as the Local Planning Authority needs to consider many of these issues before development commences, to ensure development is controlled following consultation with relevant consultees.</p>
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		<p>commence, notwithstanding any commencement control through a Construction Environment Management Plan (Explanatory Memorandum [APP-020] paragraph 5.3.2)? The response must include details of the benefits implied in paragraph 5.3.7 of the Explanatory Memorandum.</p> <p>Could the local authorities comment on whether they are agreeable to these exclusions?</p>	
DCO1.5.57	The Applicant Relevant local authorities	Are the relevant planning and highway discharging authorities and other relevant bodies content with their roles in the discharge of Requirements? (Refer to paragraph 12.4 of the Explanatory Memorandum [APP-020].)	Yes HBC are content with its roles in this aspect.
<b>9. Landscape</b>			
LV1.9.1	South Downs National Park Authority Winchester City Council East Hampshire District Council	<p>Do you agree with the selection of representative viewpoints used for the LVIA of the Converter Station and associated infrastructure [APP-250]? If not, why not?</p> <p>Do you have any comments on the presentation of baseline photographs and visualisations ([APP-251] to [APP-270])?</p>	Havant Borough Council will not be commenting on matters relating to the convertor station. We are aware that our neighbouring Authorities, comprising Winchester, East Hampshire and South Downs National Park will be commenting on these matters.

	Havant Borough Council		
LV1.9.2	As above	Do you have any comments on the appearance of the proposed 30m-high lighting columns as seen during daylight and at night-time from vantage points within the South Downs National Park and elsewhere, and should these columns have been considered in the modelling of the ZTVs?	Havant Borough Council will not be commenting on matters relating to the convertor station. We are aware that our neighbouring Authorities, comprising Winchester, East Hampshire and South Downs National Park will be commenting on these matters.
LV1.9.5	As above	With reference to the dDCO [APP-019], there would be potential for rooftop plant and machinery to be placed on the roof of the Converter Station and associated telecoms building. Do you have any comments on the landscape and visual effects of such equipment, if installed?	Havant Borough Council will not be commenting on matters relating to the convertor station. We are aware that our neighbouring Authorities, comprising Winchester, East Hampshire and South Downs National Park will be commenting on these matters.
<b>11. Noise</b>			
N1.11.2	Relevant local authorities	Is each affected local authority content with the approach and methodology used for undertaking the construction and operational noise assessments, particularly the location of survey points at the Converter Station and Optical Regeneration Station sites relative to the identified noise-sensitive receptors?	Having reviewed the survey location points and discussed them with the acoustic consultants to understand why they were chosen, we are satisfied that they have identified the most sensitive receptors.
N1.11.5	Relevant local authorities	In ES Tables 24.4 and 24.6 [APP-139], the allocation of a category for the magnitude of impact is wholly dependent on how many 'consecutive' periods would be involved. Do the local authorities believe this is an appropriate approach, or should some account be taken	Having reviewed Tables 24.4 and 24.6, We agree that additional clarity is required, in particular to confirm what a period is, and also we would agree that the approach currently in place could lead to some receptors "experience" being underrepresented , because there are "breaks" in between noisy periods.

		of the overall, total length of time (perhaps with breaks) that the noise or vibration affects a particular receptor?	We will be asking for clarity on this matter from the applicant.
N1.11.7	The Applicant Relevant local authorities	Do you believe that the application of definitions of magnitude of impact to the noise environment as set out in Table 24.13 of the ES [APP-139] is unclear? For example, what would constitute 'a total loss' of key elements or features of the baseline? Would an alternative set of definitions be more appropriate, and if so, would the noise assessment need to be re-run?	We would agree that further clarity is required and this might lead to a requirement for the assessment to be rerun. We will be asking for clarity on this matter from the applicant.
N1.11.10	The Applicant Relevant local authorities	For all of the impact assessment sections that follow ES paragraph 24.6.1.14 in Chapter 24 [APP-139], in converting the noise level magnitudes to impacts, allowance is made for the temporary nature of the effect, thus ameliorating the severity (from 'medium' to 'low' in 24.6.2.2, for example). However, does not the methodology adopted for the assessment already build duration into the calculation of magnitude (e.g. 24.4.2.36), and thus is there not an element of 'double-counting' of duration in reducing the severity of effects?  If so, what are the implications of this for the assessment findings? For example, if trenching impacts for section 4 were recalculated without the 'double-counting', would these become significant (ES 26.4.5.3 ff)?	We are satisfied that the impact assessment does not double count the impacts – it does follow the agreed and accepted methodology which is derived from the national guidance and recognised standards for assessing construction noise impact.
<b>13. Planning Policy</b>			
PP1.13.1	Local Planning Authorities	Could each of the local planning authorities please provide comments and any updates in relation to the Applicant's summary of the Development Plan position,	No comments to make



		including any emerging plans and plan documents. (The Planning Statement Appendix 4 [APP-112] refers.)	
<b>16. Traffic and Transport</b>			
TT1.16.3	LPA's	With reference to paragraphs 22.2.3.10 to 22.2.3.39 of Chapter 22 of the ES [APP-137], are there any pertinent updates in respect of the local planning policy framework?	No updates
TT1.16.9	Local planning authorities Highway authorities	Are the baseline traffic surveys set out in the Transport Assessment sufficient (Appendix 22.1: sections 1.5.3 for the Converter Station; 1.5.4 for the onshore cable corridor; and 1.5.5 for the routes that may be affected by traffic redistribution in the wider transport network) [APP-448], or is there a need for data from a wider spread of months to present a more representative view and to take account of festivals and events?	HBC will revert to Hampshire County Council as Highway Authority on this matter
<b>17. Trees</b>			
TR1.17.3	Relevant Local Authorities	<p>The Government places importance on 'street trees' in the National Design Guide for the benefit of placemaking. Is the Applicant's approach to the identification, retention, protection, mitigation of impacts and compensation for any losses of such trees sufficiently unambiguous and is it appropriate?</p> <p>Could the Applicant please comment in detail on how the 'potential removal' of the TPO trees listed in dDCO [APP-019] Schedule 11 would be avoided.</p>	In HBC area the trees impacted are highway trees, which Hampshire County Council will be providing a response in this matter.



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