

Section 60 Planning Act 2008

Application by Aquind Limited for an Order Granting Development Consent for the
Aquind Interconnector

Project reference no. EN020022

Portsmouth City Council Local Impact Report

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1. BACKGROUND, INTRODUCTION AND POLICY CONTEXT

1.1 Background

1.1.1 AQUIND Limited ('Aquind' or 'the Applicant') has applied under the Planning Act 2008 (as amended) for a Development Consent Order in respect of the proposed development.

1.1.2 The AQUIND interconnector (the 'Project') is a 2000MW subsea and underground High Voltage Direct Current (HVDC) bi-directional electric power transmission link between Normandy in France and the South Coast of England.

1.1.3 The Application seeks consent for those elements of the project located in the UK and within UK territorial waters. The proposed development comprises:

- HVDC cables from the boundary of the UK exclusive economic zone¹ 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 National Grid at Lovedean Substation
- Smaller diameter fibre optic cables to be installed together with the HVDC and HVAC cables and associated infrastructure.

1.2 Introduction

1.2.1 This Local Impact Report has been prepared by Portsmouth City Council. Portsmouth City Council is a unitary authority, having the powers of a non-metropolitan county and district council combined. It provides a full range of local government services including Council Tax billing, libraries, social services, processing planning applications, waste collection and disposal, and it is a local education authority.

1.2.2 The LIR is defined in Section 60(3) of the Planning Act 2008 as a 'report in writing giving details of the likely impact of the proposed development on the authority's area (or any part of that area)'.

1.2.3 Guidance on the content and preparation of LIRs is provided in the Planning Inspectorate's Advice Note One: Local Impact Reports (version 2, April 2012).

¹ The Exclusive Economic Zone Order 2013 (SI 2013/3161) and https://www.marineregions.org/documents/42902_Cm_8931_accessible.pdf

PCC has sought to follow the guidance in the preparation of this LIR.
Accordingly, this report is structured as follows:

- Chapter 2 sets out the generic concerns about the proposals that Portsmouth City Council shares with neighbouring local authorities, namely Havant Borough Council, Fareham Borough Council, Gosport Borough Council and Winchester City Council as well as Hampshire County Council.
- Chapter 3 identifies the local impacts of the proposed development through Portsmouth. Areas of significant concern include the likely effects of the Proposed Development on the following locations:
 - Southsea Leisure Park
 - The car park at Fort Cumberland
 - Portsmouth Day Services
 - Bransbury Park Recreation Ground and Skate Park
 - Milton Pierce Allotment Gardens
 - Milton Locks Nature Reserve
 - University of Portsmouth Sports Ground at Furze Lane/Orchard Lane/Langstone student village
 - Milton Common & Flood Defences
 - Kendall Stadium Sports Ground (Baffins FC)
 - Kendall's Wharf
 - Farlington Playing Fields
 - Impact on ecology (e.g. Brent Geese mitigation of the Sea Defences project)
 - Disruption to highway network
 - Air quality
 - Impact of noise (during construction)
 - Impacts on the amenities of local residents in close proximity to the proposed route
- Chapter 4 sets out the Environmental and Planning Impacts
- Chapter 5 sets out the Highways impacts, and
- Chapter 6 offers some concluding remarks

1.3 Policy Context

National Policy

1.3.1 National policy for this development is to be found in the National Policy Statements² EN1 (Overarching Energy) and EN5 (Electricity Networks). The NPPF³ does not contain policies for nationally significant infrastructure projects

² <https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/national-policy-statements/>

³

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

Local Policy

1.3.2 The development plan for the Portsmouth City Council area is comprised of the following adopted documents: Portsmouth Plan Core Strategy (2012) Portsmouth City Local Plan saved policies (2006) Southsea Town Centre Area Action Plan (2007) Somerstown and North Southsea Area Action Plan (2012) Hampshire Minerals and Waste Plan (2013) The development plan documents are supported by a number of adopted Supplementary Planning Documents (SPDs) which provide greater detail on specific Local Plan policies and help guide their implementation. The following SPDs that are currently in force and relevant to the proposed development include: Minerals and Waste Safeguarding in Hampshire (2016)

- Eastney Beach Habitat Restoration and Management Plan (2014)
- Parking Standards and Transport Assessments (2014)
- The Seafront Masterplan (2010)
- Air Quality and Pollution (2006)
- Developing Contaminated Land (2004)

1.3.3 Other Relevant Documents comprise the following:

- Statement of Community Involvement (2017)
- Community Infrastructure Levy Charging Schedule (2012)
- Solent Recreation Mitigation Strategy (2017)
- Interim Nutrient Neutral Mitigation Strategy (2019)

1.3.4 A new Local Plan is in preparation the timetable for which is set out in the published Local Development Scheme⁴. Essentially it is envisaged that a Regulation 18⁵ draft Local Plan will be published for consultation early in 2021 to be followed by a Regulation 19 Publication Draft in Spring / Summer 2021 and a submission draft (Regulation 22) plan in Autumn 2021. Adoption of the new plan is envisaged for the Summer of 2022.

1.3.5 Portsmouth City Council considers that the following development plan policies are relevant

PORTSMOUTH PLAN (CORE STRATEGY) (2012)

1.3.6 The Portsmouth Plan (Portsmouth Core Strategy) was adopted in January 2012, replacing many of the policies contained in the Portsmouth City Local Plan (2006). It sets out the high-level strategy for the development of Portsmouth up to 2027. In addition, the Core Strategy identifies broad locations for new development, allocates strategic sites and details

⁴ <https://www.portsmouth.gov.uk/ext/documents-external/pln-revised-local-development-scheme-aug-2020-final.pdf>

⁵ ie in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012

development management policies that will be used in the determination of planning applications.

1.3.7 The following policies have been identified as relevant to the Proposed Development:

PCS9 The Seafront – outlines how new development will be expected to contribute to the revitalisation of the seafront, tourism and wider regeneration strategy for Portsmouth. Requires protecting the nature conservation value at Eastney Beach.

PCS11 Employment Land – details where the provision of new office, manufacturing and warehouse land/floorspace to support sustainable economic development will be considered acceptable.

PCS12 Flood Risk – outlines the measures that will be taken to reduce flood risk when considering planning applications. Details requirement for sequential and exception tests and the requirement for site-specific flood risk assessment.

PCS13 A Greener Portsmouth – outlines how proposals should protect, enhance and develop the green infrastructure network in the city; sets out criteria against which applications will be considered.

PCS17 Transport – states that the council will work to deliver a strategy that will reduce the need to travel and provide a sustainable and integrated transport network; encourages development around transport hubs; safeguards land for new transport infrastructure.

PCS23 Design and Conservation – requires all new development to be well designed and to respect the character of the city.

SAVED POLICIES OF PORTSMOUTH CITY LOCAL PLAN:

1.3.8 The following saved policies have been identified as relevant to the Proposed Development:

DC21 Contaminated Land – states that permission will only be granted for development on or near contaminated land where appropriate and sufficient measures can be taken to deal with the contamination.

CM8 Portsdown Hill – development proposals on open space or other undeveloped land on Portsdown hill will not be permitted unless for recreational, agricultural or related countryside uses.

MT2 Land south of St James' Hospital – allocates land for publicly accessible open space.

MT3 Land at St James' Hospital – allocates land at St James' Hospital for new mental health care development and housing.

LH1 Langstone Harbour Open Coastal Area – only development that specifically requires a coastal location will be considered. Requires proposals to demonstrate they will not have an adverse effect on the coastal landscape, public access, navigation or nature conservation.

LH2 Langstone Harbour Coastal Zone – requires development within the identified coastal zone to demonstrate that it does not have an adverse effect on the coastal landscape, public access, navigation or nature conservation.

SEAFRONT MASTERPLAN SPD ADOPTED APRIL 2013

1.3.9 Adopted in April 2013 the Seafront Masterplan SPD contains specific proposals for the seafront area of the city and provides detailed guidance on the implementation of Policy PCS9. The SPD applies (section 4.6) to the proposed landfall site at Eastney Beach along with Fort Cumberland and its surrounds. The Seafront Masterplan is currently being reviewed. An initial issues and options public consultation took place in July and August 2018. Consultation on a draft revised Seafront Masterplan took place between 8 February and 22 March 2019. The revised Seafront Masterplan updates the 2013 document in the light of the emerging Southsea Coastal Scheme (sea defences) which is expected to act as a catalyst for change along the seafront. The revised Masterplan seeks to respond to the changes and opportunities presented by the sea defences scheme and sets out the placemaking and development aspirations for the area. 1.3.10 Potential areas of relevance to the Proposed Development include the proposals on Public Spaces and Lighting (Theme 1 – includes surface materials, landscaping) and Development Opportunities which highlights Short Term development potential at Fraser Range, Fort Cumberland and Southsea Marina.

EASTNEY BEACH HABITAT RESTORATION AND MANAGEMENT PLAN SPD ADOPTED DECEMBER 2014

1.3.10 The Eastney Beach Habitat Restoration and Management Plan SPD was adopted in December 2014 and is closely associated with the Seafront Masterplan SPD. The SPD provides guidance on the preservation and enhancement of the natural environment at Eastney along with guidance on mitigation options for the development detail in the Seafront SPD.

PARKING STANDARDS AND TRANSPORT ASSESSMENTS SPD ADOPTED JULY 2014

1.3.11 The Parking Standards and Transport Assessment SPD was adopted in July 2014. The SPD sets out standards and design principles for car / cycle parking and also provides guidance on transport assessments and travel

plans. Only Section 6, which provides guidance on assessing and dealing with the transport impacts of development, is considered relevant to the Proposed Development.

AIR QUALITY AND POLLUTION SPD ADOPTED MARCH 2006

1.3.12 Adopted in March 2006 the Air Quality and Air Pollution SPD provides guidance on how air quality and air pollution issues will be dealt with through the planning system. Section 3.3, which deals with Air Pollution issues resulting from major development projects, is of most relevance to the Proposed Development.

DEVELOPING CONTAMINATED LAND SUPPLEMENTARY PLANNING GUIDANCE (SPG) ADOPTED FEBRUARY 2004

1.3.13 The Developing Contaminated Land SPG was adopted in February 2004 and provides details on the approach Portsmouth City Council will expect developers to adopt when dealing with sites which are, or may be, contaminated.

EMERGING PORTSMOUTH CITY LOCAL PLAN

1.3.14 In February 2019 PCC published the Portsmouth City Local Plan Consultation Document. This document summarised the work that has been undertaken for the new local plan and seeks the views of the public and other key stakeholders on a variety of key issues.

2.0 MATTERS OF COMMON CONCERN

2.1 The following represents areas of common concern shared by Portsmouth City Council, the Borough of Havant, Winchester City Council and Hampshire County Council:

- (1) Disruption to the efficient running of Portsmouth's highway network and knock on effects within Hampshire (Havant and Winchester City) and on the motorway network (M275, M27, A3(M))
- (2) Loss of open space at Milton Common, Farlington Playing Fields as these provide a valuable resource not only to Portsmouth residents but the wider area
- (3) Loss playing pitches (football, cricket etc) at Farlington, Baffins Milton Rovers and University of Portsmouth (Langstone Village) as these provide a valuable sport and recreational resource not only to Portsmouth residents but the wider area
- (4) Lack of adequate consideration of alternative routes

3.0 LOCAL IMPACTS

ROUTE IMPACT GENERALLY

3.1 This section chapter 3 identifies the local impacts of the proposed development through Portsmouth following the route of the scheme and by reference to plots.

3.2 Southsea Leisure Park

3.2.1 Southsea Leisure Park is in Section 10. As shown in marked within plots 10.33 and 10.34 (see Land Plan doc ref 2.2) and Plate 3.22⁶:



Plate 3.22 - Order limit of Section 10

3.2.2 It is proposed to employ Horizontal Directional Drilling (HDD) under Southsea Leisure Park. As such it is understood that the disturbance to residents should be minimal. However due to the duration of HDD-1, which will involve construction taking place in 12 hour shifts, 7 days a week over a 44 week period commencing in Q3 2021, there will undoubtedly be disturbance to residents entering and leaving the park due to the proximity of the landing site within the Fort Cumberland open space car park.

3.2.3 The land would be subject to New Connection Rights (as with much of the land identified along the route and route options). The council has concerns about the wide nature of these rights in the future following construction in order to allow for maintenance and monitoring and which clearly extend the potential impact of the works clearly beyond construction., the Rights of Access are clearly permanent and speak for themselves but the New Connection Rights include not only the “*right to install*” and “*operate...the underground electrical and fibre optic cables*” but also to “*maintain*” the said cables (see §6.1.6 of the Statement of Reasons Doc Ref 4.1). The draft DCO (Doc Ref 3.1) at Art 2 defines “*maintain*” widely and as including “*inspect, upkeep, repair, adjust, alter, improve, preserve and further includes remove, reconstruct and replace any part of the authorised development*” albeit subject to the works not giving rise “*materially new or materially different environmental effects*” than in the Environmental Statement (‘the ES’).

⁶ Environmental Statement – Volume 1 – Chapter 3 Description of the Proposed Development [Doc Ref: 6.1.3]

3.3 The car park at Fort Cumberland

- 3.3.1 The car-park at Fort Cumberland which forms part of the Open Space will be heavily impacted by the proposed works due to it being the chosen 'landfall location' and the location of the proposed Optical Regeneration Stations (ORS). The parts of the car park that are to be subject to Compulsory Acquisition and New Connection Rights are shown in plots 10.30 and 10.32 (respectively)(Land Plans doc ref 2.2 and Book of Reference doc ref 4.3)
- 3.3.2 With regard to the landfall location, this will be located in the car park south of Fort Cumberland Road, adjacent to the Land West of Fort Cumberland SINC. Fort Cumberland SINC and Scheduled Ancient Monument are located further east. The car park will be the location of the temporary northern compound of the HDD from TJB⁷ (Transition Joint Bay) to Marine Cable Corridor (HDD 1) which will run in a south-south-easterly direction under Southsea Holiday Home, Lodge & Leisure Park and Eastney Beach to a point off-shore. The TJB, where the Marine Cables and Onshore Cables (and FOC) will also be jointed together, will be located in this car park.
- 3.3.3 The two Optical Regeneration Stations required in connection with the FOC will be located at the northern end of the car park (section 3.6.5) as illustrated in the Indicative Optical Regeneration Station(s) Parameter Plan (document reference 2.11) The exit point of the HDD is expected to be approximately 1,400 to 2,000 m in length from the TJB in the Marine Cable Corridor. As referred to in Paragraph 3.6.4.55 of ES Chapter 3 (Doc Ref APP-118) it is not determined yet whether the HDD direction will be onshore to marine, marine to onshore, or drilling from both ends. Where the Onshore Cable Route impacts on publicly accessible open space, in this Section, Fort Cumberland Road car park details of the anticipated location and duration of impact is, according to paragraph 3.6.4.56 of the above document detailed in Table 3 of Appendix 3.5. However there would appear to be no Table 3 as shown by the extract from that document below.

⁷ Each Transition Joint Bay (TJB) is to be 8m by 3m by 2m and will involve an excavation area some 15m by 5m.

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3.4 Portsmouth Day Services

3.4.1 SensePlus Portsmouth is an In house Day service for adults with Profound and Multiple learning Disabilities. It is based on two sites across the city, Ferry Road PO4 9AG and Balliol Road PO2 7PP. Of these the Ferry Road site would be impacted by the proposed cable route. Whilst the route of the cabling does not appear to directly impact on the Day Centre, Plots 10-24, 10-27 and 10-31 being on the highway adjacent to the day centre, and utilising the only access to the site, will have an impact on the service users and those who live along the route shown who are provided transport; as such there would be disruption when /if the works begin.

3.5 Bransbury Park Recreation Ground and Skate Park

3.5.1 This open space and park (which is recognised by the applicant as special category land) has 3 football pitches hosting approximately 54 games in a season. Plot 10.21 as shown in the Land Plans (ref 2.2) shows the part of the recreation ground that is to be subject to New Connection Rights. The order limit plans show the works interfering with at least one of the pitches on site and resulting in impacts or loss to the field access and /or car park. This would have significant effect on the use of the pitches and ability to complete league fixtures. An average of 33 different teams use these pitches affecting 1296 participants per season with a loss of revenue in the region of £3000.

3.5.2 The park and car park is also used by local people for dog walking and general use including a skate park and open space any loss of areas of the park for any period would be detrimental to the health and wellbeing of the local residents as the next nearest open space is some distance away.

3.5.3 The order limits include the whole car park part of Football pitch 2, running adjacent to some very mature trees and tracks across the whole park from Bransbury Road to Glasgow Road in a wide swathe. Although works have

been estimated at approximately 12 weeks the Council has assumed this does not include re-instatement times of approximately 3 to 6 more months. Depending on timings this would mean the pitch would be out of action for up to 9 months.

- 3.5.4 The order limits could restrict access to the field, football pitch 3, skate park, and car park including disabled parking bays for the full length of the order limit. The applicant has not included any proposals to mitigate the impacts of works, and the displacement of users of the open space.

3.6 Milton Piece Allotment Gardens

- 3.6.1 This allotment land is identified on the Land Plans (Doc ref 2.2) as plots 10.12; 10.13; 10.14.
- 3.6.2 Plots 10.12; 10.13 are proposed to be subject to permanent New Access Rights and plot 10.14 subject to New Connection Rights. The plots are also noted as special category land by the applicant.
- 3.6.3 Both these rights mean that the allotment land will not only be subject to potential disruption during construction but also clearly into the future once operational, the Rights of Access are clearly permanent and speak for themselves but the New Connection Rights include not only the “*right to install*” and “*operate...the underground electrical and fibre optic cables*” but also to “*maintain*” the said cables (see §6.1.6 of the Statement of Reasons Doc Ref 4.1). The draft DCO (Doc Ref 3.1) at Art 2 defines “maintain” widely and as including “*inspect, upkeep, repair, adjust, alter, improve, preserve and further includes remove, reconstruct and replace any part of the authorised development*” albeit subject to the works not giving rise “*materially new or materially different environmental effects*” than in the Environmental Statement (‘the ES’).
- 3.6.4 If Aquind/the future developer carry out the construction works as the Council understands was indicated to the allotments association, namely drilling under the allotments, it appears there would be little or no impact on the allotments at that point.
- 3.6.5 However as noted above the rights sought by the applicant by means of compulsory acquisition powers reserves the right to open dig through the allotments and what is more the ES at § 3.6.4.46 (dec ref 6.1.3) describes during construction “*access will be required over the paths [sic] within the Allotments during installation works for monitoring purposes*”. In addition, no limit is set out as to how access is to be gained to the cables once installed other than through the surface.
- 3.6.6 As such it appears to the Council that there is in fact the clear potential to disrupt the cultivated allotments and the allotment holders (who are tenants of the Council) as well the large sections of roadways and the main car park and entrance area within Plots 10-13 and 10-14)

- 3.6.7 It is of considerable concern to the Council based upon recent communications with its tenant allotment holders that this potential disruption does not appear in fact to have been explained either to the Allotment Association and/or the tenants directly. For example at a presentation held by Aquind at the allotments the Council is aware it was suggested that there would be no surface disruption to the allotments and that there should be no reason for the holders to be concerned.
- 3.6.8 Also the requirement to have extended access to the route of the new cable, as a consequence of the rights sought for acquisition may have implications on allotment holders generally along this route. Even if the cable were to be drilled under the allotments, as asserted by the applicant, the permanent easement sought subsequently for 50m along the cable, would directly affect around 97 allotment plots. There is no detail provided that the Council could identify as to what this permanent easement sought entails but as noted the clear implication of having such a right which is currently not circumscribed (despite what the DCO appears to suggest about the ES). Put simply the rights sought currently mean that AQUIND or any successor would be permitted access to allotment plots at any time and that this would include the right to excavate these plots throughout construction and in future to access the cables.
- 3.6.9 Alarming, none of the allotment tenants or the interests and rights they hold as tenants of the allotment has been identified or listed within the Book of Reference or in the Land Plans.
- 3.6.10 Setting that aside, a good number of the allotment holders have established and cultivated their plots over many years. It is evident that the loss and disruption caused by excavating these plots for the cable route would be devastating.
- 3.6.11 The work Order limit as shown in the Land Plans covers the whole of Milton Piece which has some 200 allotments and part of Eastney Lake affecting 52 allotments there, plus 2 of the main car parks and access roads and paths. There is no evidence as to what is proposed in terms of access what is required over this area.
- 3.6.12 This is not sustainable at any time, all of these allotments are let to tenants and any threat of disruption for up to 7 years would clearly be a matter of major concern and anxiety to the affected tenants.
- 3.6.13 The Council has no alternative allotment sites and waiting lists at all sites with nearly 4 years at the Milton site.
- 3.6.14 The ES in the Council's view makes no assessment of this potential impact and no mitigation measures or controls on these powers appear within AQUIND's application documents. As such the Council would highlight the potential disruption and loss to allotment holders as a consequence of the DCO as going unrecognised by the Applicant and as in fact being severe.

3.7 Milton Locks Nature Reserve

3.7.1 Land at Milton Locks (see plots 10-03 and 10-09, Plan Sheet 10 of 10 (doc ref APP-008 and 008a) is leased to Hampshire and Isle of Wight Wildlife Trust, as a Local Nature Reserve to serve educational and recreation activities.

3.7.2 The application shows the land to be treated in the same manner as Milton Allotments during construction (horizontal directional drill) thereby, minimising hopefully impact. However, for the same reasons noted above in respect of Milton Allotments, the rights (i.e. New Connection Rights) sought clearly allow for there to be variation to this method, the extent of impact on a sensitive ecological site would need to be re-evaluated as well as the potential to disrupt the land in future for maintenance purposes .

3.8 University of Portsmouth Sports Ground at Furze Lane/Orchard Lane/Langstone student village

3.8.1 The current order limits provide for two either/or route options down either Furze Lane to the west of the student village or through a large area of playing fields to the east of the student village. Following the virtual walkthrough presentation by AQUIND on 28th September 2020, PCC has been advised that it is proposed to utilise the route option through the playing fields to the east of the student village (see below).

3.8.2 However under the current order limits both options are under consideration. Should the Furze Lane option be pursued this will cause disruption to a bus route that utilises this highway as well as impacts on a line of historically significant poplar trees along the highway edge. Furze Lane is also the only form of access to the student village campus and sports centre.

3.8.3 It is understood that the works at University of Portsmouth Playing Fields and Langstone Sports Site, if the eastern route option is pursued, will result in the following temporary recreational disturbances:

- Temporary loss of the football pitch for the duration of works (an 8 week period, with an additional period of 8-10 weeks for re-turfing).
- Temporary loss of the southern rugby pitch for the duration of works (an 8 week period, with an additional period of 8-10 weeks for re-turfing).



The pitches are the only such facility owned and available to the University and disruption to their access will have implications for sports participation and the academic programme of the University. The pitches are also used by community user groups and other groups outside of the academic year.

In addition to temporary disruption the eastern route will also place the interconnector infrastructure within an area that will require ongoing access/maintenance having an impact on the operation of the University Sports centre and any future development or alterations the University wishes to make. The previously developed status of the underutilised land immediately adjacent to the proposed order limits are indicative of future opportunities to make better use of this land and its setting. The provision of the proposed infrastructure will place a constraint of future planning, design and layout for this area.

3.9 Milton Common & Flood Defences

3.9.1 The land in this area is identified as Plots 9-01 to 9-20 and Plots 902 to 9-14 on Land Plans Doc Ref 2.2

3.9.2 There are 2 route options identified across and round Milton Common - one through the centre and one around the western edges. Although Milton Common is large enough to accommodate these works, whilst still leaving enough space for other users, the Common is a designated SINC site (Site of Importance for Nature Conservation). The many users who are very protective

of this site and together with the nature conservation interest prevalent on this site mean that any works carried out here must take this into account.

- 3.9.3 The site is also mostly made up of landfill ground with varying levels of contamination below the surface which is clearly a further issue for concern when carrying out any excavation and cable laying works.
- 3.9.4 There have recently been major coastal defence works carried out on this site and it is imperative that any future works do not impact on the integrity of these sea defences.
- 3.9.5 There is a third route option noted on the Land Plans (EN020022-2.2-LP-Sheet9) which utilises the A2030 Eastern Avenue southward to its junction with Eastern Avenue and Moorings Way to bypass the Common completely. This would result in added congestion on a main arterial road A2030 into Portsmouth but would have little effect on Milton Common apart from access.
- 3.9.6 The timing and construction times of these works are unclear. However the Council understands that the work order limits are to remain in place for 7 years which would have a detrimental impact on the highway network and the amenities of both local residents and users of the Common.

3.10 Kendall Stadium Sports Ground (Baffins FC)

3.10.1 Portsmouth City Council is the landlord of Kendall's Stadium, which is leased to Baffins Milton Rovers Football Club ('Baffins FC'), land identified as being plots 8-02 and 8-03 in the Book of Reference [doc ref 4.3 and Land Plan doc ref 2.2] and subject to proposed New Connection Rights. Further to a recent Microsoft Teams Meeting (28th September 2020), the Council was presented by the Applicant and its advisors with proposed changes to the order limits affecting the Stadium land. As such, the Council will respond formally in its capacity as an Affected Person when the changes are consulted on, and our opinions expressed here may be subject to additional points raised in future responses and submissions.

3.10.2 We understand that the Applicant has engaged with the Council's tenant, Baffins FC, and a preference has been identified between parties in respect of a route alignment for the cables through stadium land. However, the Council wishes to ensure, as freeholder and landlord, that the use of the land is not prejudiced in any way, either during construction or once the Proposed Development is operational.

3.10.3 As such, the Council considers it is fundamental that there are appropriate reinstatement requirements imposed along with clear commitments as to timing of works (to avoid impacting the use of the ground), as well as indemnity provisions to avoid any future liability falling to Baffins, the Council

or any other future occupiers of the site. The Council is seeking the Applicant's agreement to these obligations by securing them in a land agreement between the Applicant, the Council and Baffins FC as tenant, to ensure specific obligations are legally enforceable. In the event that no such agreement can be reached or in the alternative the Council consider these matters need protection through requirements imposed upon the DCO.

3.10.4 The same issues currently arise here as above as a consequence of seeking New Connection Rights to the potential for future disruption as a consequence of the future operator having rights to access the cable to carry out monitoring and maintenance works.

3.11 Kendall's Wharf

3.11.1 Sea defences are in the process of being constructed (as part of the North Portsea Island coastal defence scheme) along the stretches of existing sea wall shown within the vicinity of the proposed cabling in sections 7 and 8 and the very top of section 9 (see e.g Land Plans doc ref 2.2). The majority of the land shown as falling within the order limits for these sections (see Plot 8-03 of Land Plans doc ref 2.2) together with the indicated route of the cable, is in the freehold ownership of Portsmouth County Council and in some areas is subject leasehold interest granted to a third party by the Council.

3.11.2 In section 7, where the proposed route extends from beneath seabed to meet with the land in the area of Kendall's Wharf, it is important that the work required does not interfere or compromise the sea defences that have already been constructed. It is noted that the route of the cable is due to extend beneath the compound area of Kendall's Wharf. This area is currently occupied by the contractor carrying out construction of the sea defences on behalf of the Council. The area will continue to be occupied as the main compound and offices for the duration of the sea defence scheme. Work commenced in January 2020 and is due to complete in December 2023. These sea defence works are of considerable importance and there should be no interruption or disruption to use or occupation of this area, such that it affects the contractor's ability to deliver the scheme on time. An area of the compound is also in use by Aggregate Industries as parking for its activities at the wharf and for which the Council receives a rent.

3.11.3 Where the line of the cable is shown in blue and going immediately south of the compound (Application document reference 2.2 Low Resolution - Land Plans Sheet 8 of 10) this initially crosses land leased by the Council to Baffin and Milton Rovers FC football ground (see above). There is also a further football field/cricket pitch on land owned by the Council immediately south of this which is in regular use. It appears that trenching to lay the cable will cross these areas and, dependent upon timing, may affect the ability to use the grounds for playing of sport. Depending on when this is done, it could be for an extended period of time. This could have a potentially very disruptive

impact therefore. No proposals from AQUIND have been provided in the DCO to mitigate the loss of open space or mitigate the displacement of users of the land.

- 3.11.4 The cable route which is shown as diverting to the South East from the compound runs along a vehicular access route to both the Tudor Sailing Club and Andrew Simpson Watersports Centre (ASWC). This route is also used by the contractor building the sea defences. HGVs transport materials and equipment from the main compound to further two compounds, one at the south of ASWC, the other just south of the cricket pitch. It is anticipated that this access will be required at least until the end of 2022. Access will also need to be maintained along this route for the benefit of the Sailing Club and ASWC so that they may continue to access their premises.
- 3.11.5 In addition it appears that the boat compound which forms part of the lease between the Council and the Tudor Sailing Club, has been identified as being suitable car parking in connection with the proposed Aquind scheme. This area is used for the storage of boats and is in regular use by members of the Sailing Club. There is no obvious alternative within the immediate area for the storage of the boats and there is concern that the activities of the Council's tenants will be compromised as a result of this proposal. It should also be noted that both the Sailing Club as tenant and the Council as landlord will both need to be party to any discussions concerning use of this site.
- 3.11.6 Following the proposed route of the cable further south, it crosses a car park which serves the sports field at Plot 8-03 of Land Plans doc ref 2.2. This is currently let to Audi for parking of its employees during office hours and for which the Council receives a rental income. The area immediately adjacent is being used by the Council's contractor for the sea defence scheme as a materials storage compound. It is therefore important that access continues to be maintained to this area whilst any AQUIND related works are taking place.
- 3.11.7 In section 8 of the cable route (see eg Land Plan doc ref 2.2) the cable passes to the west of Harbourside Holiday Park, running along the Eastern Road before crossing over towards Great Salterns Quay (see plot 8-06 of Land Plans doc ref 2.2). It is noted that the order limits extend to include the car park at the Harvester Inn (see Plot 8-09 of Land Plans doc ref 2.2). This is let by way of a long lease to Butlers & Mitchell. Whilst it is understood that Aquind has approach B&M directly about its proposals, it should be noted that the Council retains the freehold to the property and will need to be party to any agreement.
- 3.11.8 Running south, it appears that the proposed route of the cable is very closely aligned to the sea defence wall. Work on this section of the Proposed Development (or the SDW???) is scheduled for 2022-23 and it is important that the laying of any cable should neither impede the construction of nor compromise the completed sea defences. It is also indicated the cable and the order limits will include Salterns Quay car park (see plot 8-10 of Land

Plans doc ref 2.2), however this has been identified for use as a compound by the contractor for the sea defence scheme from 2022 and it is important that use and access of this area is not compromised during construction.

3.11.9 In summary the proposed cable route and construction works throw up issues in respect of timings and in particular how these will interface with the construction of important sea defences for Portsmouth along this stretch over the next 3 or so years, assuming that there is no slippage. It is extremely important that the AQUIND scheme should neither compromise nor impede progress of this crucial sea defence scheme for the city. In addition, it is of concern that construction will significantly disrupt the peaceful enjoyment and use of properties let by the Council to a number of tenants, as well as potentially disrupting income flow to the Council from these lettings.

3.12 Farlington Playing Fields

3.12.1 Farlington Playing Fields is shown in plots 7-12 to 7-18 of Land Plans Doc Ref 2.2. This is the City Councils largest sports ground and has 2 cricket squares, 10 senior football pitches, and 1 junior football, and rugby training pitch. Over 56 different teams use the football pitches at Farlington and it is an important and well used facility.

3.12.2 On an average Sunday morning during the football season this would host 10 or 11 football games affecting over 240 individual people not including any spectators. There are also some games on Sunday afternoons and occasional mid-week games.

3.12.3 Cricket matches are played at weekends as well as mid-week.

3.12.4 This sports field hosts in a season an average 238 senior football matches, and 39 cricket matches plus junior football on regular basis a year. Over the season this would affect over 5700 football participants and over 900 cricketers. In addition this would result in a loss in revenue to the Council in the region of £13,500 for football and £3200 for cricket per annum. While the income is important to Portsmouth City Council, the bigger issue is the loss of available facilities to the residents of Portsmouth and wider users of the playing fields. This would be multiplied year on year for the duration of the works up to 7 years.

3.12.5 This site also hosts camping for the Victorious music festival held in August each year where the whole field is used for camping over the weekend. Unfortunately within the city no other site offers the space or infrastructure required. Loss of this facility would result in significant financial loss to Portsmouth City Council and possibly effect the whole Victorious festival for a period of up to 7 years. A plan of the campsite for 2019 is provided with this LIR.

3.12.6 The Aquind application states as a guide (but not confirmed) in Table 3.9 of the Environmental Statement – Volume 1 – Chapter 3 Description of the Proposed Development (Doc Ref 6.1.3) that construction works will be need to be on site for around 52 to 58 weeks between Q3 2021 and Q2 2024. However, there is no mention of re-instatement between works or whether reinstatement will be carried out on completion of all works.

Table 3.9 - Indicative onshore construction programme

Activity	Indicative Programme
Converter Station Construction	Q3 2021 – Q1 2024
Onshore HVDC Route Construction/ Cable Installation	Q3 2021 – Q4 2023
HDD and Landfall Construction (Onshore)	Q3 2021 – Q4 2023
Converter Station Commissioning	Q4 2023 – Q2 2024

3.12.7 Aquind have not offered any mitigation as to how sports fixtures will be accommodated, bearing in mind they also require an unspecified area of the car park as a site compound. The order limits impact directly on 8 senior pitches the 9v9 and 1 cricket the car park and access road so we have to assume this would make the majority of the whole field depending on car park and access availability unusable for up to 2 years plus the reinstatement times of 6 to 12 months this would make nearly 3 years of disruption. However construction related limitations would be in place on land within the Order limits for 7 years so even this 2 -3 year estimate is not confirmed.

3.12.8 Farlington also has an integrated land drainage system covering the whole site and any damage to part of this may impact on the integrity of the whole system. A plan showing the layout of the drainage system is provided with this LIR. The scale and extent of the order limits indicates that a large area of the fields would be impacted either through digging or heavy vehicle movements which could potentially damage the drainage system below ground and require a large part of the field drainage to be completely re-laid/replaced. This on top of the construction period would mean several months would have to pass before the playing surface is usable again further impacting on the sports field. This must be taken into consideration during and after works are completed, no mention of how or when this will be reinstated without full re-instatement the field is prone to flooding and potentially unusable.

3.12.9 Any disruption to this sports ground would have significant impact on both football and cricket over a number of seasons. Unfortunately, Portsmouth City Council does not have the capacity to move these games to alternative venues. This would have a fundamental impact on both the football and cricket leagues and, with only limited alternative pitches available, it is likely to void whole league seasons for 2- 7 years with the subsequent health and wellbeing of users affected. This in the Council's view would be clearly

unacceptable to the leagues but is a severe impact that the applicant has simply failed to acknowledge.

3.12.10 Currently there are no mitigation or alternatives put forward by Aquind for the loss of the sports pitches or potential impact on Victorious festival camping.

3.12.11 Beyond the use of Farlington sports field for sports and recreation, it is also an identified site for overwintering birds. As such any disruption or lack of grazing availability during the winter months would have potentially significant impacts on the wild life that use this site. Again, no assessment or mitigation has been put forward by Aquind or any assurance that for example grass cover would be intact for the winter months.

3.13 Impact on Zetland Field

3.13.1 This is a small, local park with a playground for children and large grass area within Plot 7-04 of the Land Plans Doc Ref 2.2. The park is used for dog walking and general activities by the local children and residents.

3.13.2 Any disruption to this park would have a detrimental localised effect on the residents as the next nearest park /open space is nearly $\frac{3}{4}$ mile away across the busy A2030 Eastern road.

4.0 ENVIRONMENTAL and PLANNING IMPACTS

4.1 This chapter identifies the local impacts of the proposed development by reference to specific environmental and planning issues.

4.1 Impact on Ecology

A. Trees.

4.1.1 The Aquind application appears to require rights to fell, lop, or root prune any tree or hedge that arises within the works area.

4.1.2 Portsmouth is a city which is heavily built up and trees are considered an extremely important part of its environment. Any loss of trees or hedges would be a matter of great concern to the Council and the local residents.

4.1.3 The importance of trees is highlighted by the fact that the Council is regularly asked and encouraged to plant more trees by both residents and government. The removal of trees and in particular mature trees would be a very backwards step and would be detrimental.

B. Over wintering birds

4.1.4 Both Langstone and Farlington are sites designated as overwintering bird grassing sites for Brent Geese. As noted above, following cable laying operations there is concern that there by sufficient grass coverage intact and ready for the winter season and which could detrimentally affect the birds overwintering on these sites.

C. Reinstatement

4.1.5 The applicants have gone into some detail about re-instatement over the cable route albeit without confirmed timescales, however there is no mention at all that the council could find of the reinstatement of other areas within the order limits that will have been subject to potentially large vehicles tracking back and forth, stock piling of materials etc.. The effect of these operations could potentially compact the ground and damage the soil structure, and drainage at Farlington.

4.1.6 The Council considers re-instatement clearly to be a very important issue with regard to assessing the permanent impact of the Aquind works. To that end the Council it intends to raise with the ExA the question of ensuring an independent inspector (for example from the IOG (institute of groundsmanship or similar) can be agreed by both parties to assess and/or confirm reinstatement works. Such an Inspector would be provided at Aquind's expense and ensure the reinstatement is carried out to both parties agreement and which would help to prevent protracted arguments between the Council and Aquind as to the quality and nature of any reinstatement.

D. SINC sites (Sites of Importance for Nature Conservation)

4.1.7 Any works carried on within designated SINC's must have regard to protecting their biodiversity and community value.

4.1.8 Milton Common and Fort Cumberland Open Space are both identified as Sites of Importance for Nature Conservation Value in the Portsmouth Plan (Local Plan) and clearly have considerable value in the context of a very developed urban area such as Portsmouth.

4.1.9 It is highly material in the Council's view that regard be given to ecological surveys that describe the presence of habitats and species, and also the management aims of the described in management plans for the sites.

4.1.10 The Examining Authority will no doubt when assessing this DCO consider whether the application adheres to all relevant legislation relating to the proposals in the sites and environs e.g. Conservation of Habitats and Species Regulations 2017, Wildlife and Countryside Act 1981 (as amended). In addition, whilst the National Planning Policy Framework (NPPF) 2019 does not apply to DCOs the council asks the ExA to consider any failures to comply with its policies in this context as indicative of a failure to adhere and therefore important and relevant .

4.2 Air quality

- 4.2.1 Environmental campaign organisation ClientEarth successfully challenged the government's national Air Quality Policy a number of times in the Courts based upon, inter alia, a failure to include actions necessary to achieve legal limit value for nitrogen dioxide in the shortest possible time in accordance with the EU Air Quality Directive and the UK Air Quality Regulations⁸. As a result of this legal action Portsmouth City Council has been issued with four Ministerial Directions in respect of air quality. These direction place a legally binding duty on the Council to undertake a number of steps to improve air quality in the city, in particular to reduce air pollution concentrations across the city to within the legal limits, in the shortest possible time.
- 4.2.2 The areas of the city that are currently in exceedance of the legal limit for annual average concentrations of nitrogen dioxide are shown on the attached map provided (red dots). There are also a number of locations in the city where the nitrogen dioxide concentrations are high but not technically in exceedance. These are known as 'near exceedance' locations and are shown by the orange dots on the attached map. One thing that each of the exceedance and near exceedance locations has in common is that emissions from road traffic are the major contributor to the levels of nitrogen dioxide recorded and therefore these locations are very sensitive to increases in traffic volumes or queuing traffic.
- 4.2.3 It should be noted that the map shows a point on the Eastern Road water bridge as being a 'near exceedance' location. Technical studies have shown that the cause of the high nitrogen dioxide concentration in this location is queuing traffic travelling northbound out of the city. Whilst the DCO application proposals do not suggest lane closures along the water bridge during construction, the use of temporary traffic management along the length of Eastern Road has potential to lead to queuing traffic in this location. There is therefore a clear concern that the lane closures will result in increased queuing time for vehicles which will have a detrimental impact on air pollution concentrations at the 'near exceedance' location, potentially pushing this site into exceedance. Equally there is also concern that the lane closures on Eastern Road could also result in traffic rerouting via the M275 to travel into/ out of the city, meaning that additional traffic will be travelling through the

⁸ See R (ClientEarth) v Secretary of State for the Environment, Food and Rural Affairs [2015] UKSC 28; R (ClientEarth) v Secretary of State for Environment, Food and Rural Affairs [2016] EWHC 2740 (Admin); 22. R (ClientEarth) v Secretary of State for Environment, Food and Rural Affairs [2017] EWHC 1618 ; R (ClientEarth) v Secretary of State for Food, Environment and Rural Affairs [2018] EWHC 315 (Admin).

exceedance locations, which again are sensitive to increases in traffic volumes and queuing.

4.2.4 The mitigation measures included in the Operation Management Plan and ES (chapter on Air Quality ref 6.1.23) are considered sufficient to reduce some of the air quality impacts of the construction works in respect of the proposal, however it is noted that there is uncertainty in the modelling. To that end therefore "it cannot be determined with certainty that an exceedance of the NO₂ annual mean objective will not occur as a result of diverted traffic." (see para 23.6.4.119 of ES Chapter on Air Quality ref 6.1.23)

4.2.5 The Government requires Portsmouth City Council (PCC) to implement a Class B charging Clean Air Zone (CAZ) as part of its national air quality plan and as set out in the Ministerial Directions. This is in order to reduce the nitrogen dioxide emissions to within legal limits across the city, with a focus on the exceedance locations. If legal limits of concentrations of nitrogen dioxide are not met by the end of 2022, PCC could be required to implement a more stringent CAZ i.e charging additional vehicle classes vehicles. Therefore proposals which risk achievement of this legal objective cannot be supported unless sufficient mitigation of the impacts can be found.

4.3 Impact of noise (during construction)

4.3.1 It is the Council's view based upon considering the ES (doc ref 6.1.24), that noise from construction of the Proposed Development during the day time will be no different to normal road works, however noise levels should be monitored by the contractor to ensure that they are complying the levels as set in BS5288.

4.3.2 The main concerns are works that need to be carried out late at night and through the night. This has been identified as a significant impact in the ES noise report at doc ref 6.1.24

The areas identified in the ES noise report are:

(1) Section 5 - Havant Road between Farlington Ave and Eastern Rd.

This assessment refers to a significant amount of properties likely to be affected - Work to take place between 22:00 - 07:00hrs

Paragraph 24.6. 6.13 refers to equipment and activities not taken into account in the noise report due to noise levels being unacceptable at night time in any circumstance due to the close proximity of sensitive receptors e.g. Trenching, road breaking and cutting equipment and resurfacing of the road.

(2) Section 6 - Fitzherbert road and Sainsburys car park

The assessment refers to a significant amount of properties likely to be affected - work to take place between 22:00 - 07:00hrs

Paragraph 24.6. 7.10 refers to equipment and activities not taken into account in the noise report due to noise levels being unacceptable at night time in any circumstance due to the close proximity of sensitive receptors e.g. road breaking and cutting equipment and resurfacing of the road.

(3)Secton 8 - Eastern Road between Airport Service Road and north of Milton Common

Harbourside Caravan / Mobile Home Park is identified as only as one property in the ES noise report, although there are approximately 69 pitches within the park the majority of which are occupied by mobile homes. As set out on their website (<https://www.harbourside-park.co.uk/>) Harbourside Park is an exclusive gated community of Holiday Homes and Lodges open for 11 months of the year including Christmas and New Year.

Paragraph 24.6.9.21 sets out that the weekday evening, weekend day time and night time works represent a high magnitude of impact. It is clear therefore, Harbourside Caravan Park and Great Salterns Mansion Harvester will experience a direct, temporary, short term but significant effect.

The work across this area is expected to take up to 7 days. 24.6.9.8.

This is likely to affect all the occupants and residents and it is entirely wrong to approach this on the basis that a single property is affected. No alternative accommodation has been offered to residents affected by the noise at night or at all. The council's main concern is residential occupants in Harbourside Caravan Park as caravans do not have the same sound insulation properties as houses.

(4) Great Salterns Golf Course and Inn Lodge

This is identified in ES noise report as being medium/low sensitive receptor and therefore will not be significantly impacted by the night works

- 4.3.3 36 Residential properties are affected on Eastern Road 160m to 260m southwest of night works (no longer than 4 nights). This is identified in the ES noise report as not having a significant impact due distance of works in relation to the location of sensitive properties.
- 4.3.4 The Council considers however that: further noise assessment is necessary and should include noise levels for trenching, road breaking and cutting equipment as well as resurfacing of the road if night works are going to be carried out and these activities are taking place.
- 4.3.5 In addition, mitigation measures have not been clarified for day time noise or night time noise. It is a matter of great concern if this is to be left wholly to the contractor as appears to be the case.
- 4.3.6 It is noted that there was mention of different contractors carrying out the works. The Council is concerned that if a contractor has not finished the

section they are working on what measures there will be in place to stop them working late into the night, for example is the use of a notice under Section 60 (Control of noise on construction sites) or Section 61 (Prior consent for work on construction sites) of The Control of Pollution Act 1974 available?

4.4 Impacts on the amenities of local residents in close proximity to the proposed route

4.4.1 It is the Council's view that people living in their houses or flats in Portsmouth should expect to enjoy a good level of residential amenity. This amenity is influenced by a range of factors such as private outdoor space, privacy, outlook and natural light. On this basis, when operational, the Council considers that the development should have minimal impact. However during the construction phase, particularly at the locations identified below, there will be clearly be an impact on 'residential amenity' of varying degrees of harm. The council has identified these and suggested mitigation measures that ought to be required and confirmed as achievable prior to any DCO being confirmed either through the imposition of a requirement in the DCO and/or some other legal measure or agreement.

4.4.2 From north to south:

<u>Land Plan & Street Name</u>	<u>Likely disruption</u>	<u>Degree of harm</u> Red - Most harmful Amber Green - Least harmful	<u>Recommended mitigation</u>
<u>Land Plan 6:</u>			
Farlington Avenue	Disturbance during trenching (noise, dust, vibration), restricted access, anti-social hours of working	RED	Minimise construction period, restrict hours of working (no overnight or Sunday / bank holiday working)
Eveleigh Road	Disturbance during trenching (noise, dust, vibration), restricted access, anti-social hours of working Increased awareness	RED	Minimise construction period, restrict hours of working (to outside of school drop off / pick up times, no overnight or Sunday / bank holiday working)

<u>Land Plan & Street Name</u>	<u>Likely disruption</u>	<u>Degree of harm</u> Red - Most harmful Amber Green - Least harmful	<u>Recommended mitigation</u>
	given proximity to school		
Havant Road	Disturbance during trenching (noise, dust, vibration), restricted access, anti-social hours of working	AMBER	Minimise construction period, restrict hours of working (no overnight or Sunday / bank holiday working)
<u>Land Plan 7</u>			
Eastern Road	Disruption to traffic flows, Disturbance during trenching (noise, dust, vibration), restricted access, anti-social hours of working	AMBER	Given that Eastern Road is a main distributor road, suggest overnight working (when traffic flows are lower) and to expedite the construction process
<u>Land Plan 8</u>			
Harbourside Park	Disturbance during trenching (noise, dust, vibration), restricted access, anti-social hours of working	RED	Minimise construction period, restrict hours of working (no overnight or Sunday / bank holiday working)
<u>Land Plan 9</u>			
Eastern Road	Disruption to traffic flows, Disturbance during trenching (noise, dust, vibration),	AMBER	

<u>Land Plan & Street Name</u>	<u>Likely disruption</u>	<u>Degree of harm</u> Red - Most harmful Amber Green - Least harmful	<u>Recommended mitigation</u>
	restricted access, anti-social hours of working		
Eastern Avenue	Disturbance during trenching (noise, dust, vibration), restricted access, anti-social hours of working	RED	Minimise construction period, restrict hours of working (no overnight or Sunday / bank holiday working)
Moorings Way	Disturbance during trenching (noise, dust, vibration), restricted access, anti-social hours of working	AMBER	Minimise construction period, restrict hours of working (no overnight or Sunday / bank holiday working). Keep workings away from residential frontages wherever possible
Furze Lane	Disruption to traffic flows, Disturbance during trenching (noise, dust, vibration), restricted access, anti-social hours of working	AMBER	Minimise construction period, restrict hours of working (no overnight or Sunday / bank holiday working). Restrict construction to outside of University term / semester times
<u>Land Plan 10</u>			
Furze Lane	Disruption to traffic flows, Disturbance during trenching (noise, dust, vibration), restricted	RED	Minimise construction period, restrict hours of working (no overnight or Sunday / bank holiday working). Restrict construction to outside of University term / semester times

<u>Land Plan & Street Name</u>	<u>Likely disruption</u>	<u>Degree of harm</u> Red - Most harmful Amber Green - Least harmful	<u>Recommended mitigation</u>
	access, anti-social hours of working		
Locksway Road	Disturbance during trenching (noise, dust, vibration), restricted access, anti-social hours of working	RED	
Longshore Way	Disturbance during trenching (noise, dust, vibration), restricted access, anti-social hours of working	AMBER	
Kingsley Road	Disturbance during trenching (noise, dust, vibration), restricted access, anti-social hours of working	RED	
Yeo Court	Disturbance during trenching (noise, dust, vibration), restricted access, anti-social hours of working	RED	
Henderson Road	Disruption to traffic flows, Disturbance during trenching	RED	

<u>Land Plan & Street Name</u>	<u>Likely disruption</u>	<u>Degree of harm</u> Red - Most harmful Amber Green - Least harmful	<u>Recommended mitigation</u>
	(noise, dust, vibration), restricted access, anti-social hours of working		
Fort Cumberland Road	Disruption to traffic flows, Disturbance during trenching (noise, dust, vibration), restricted access, anti-social hours of working	RED	Minimise construction period, restrict hours of working (no overnight or Sunday / bank holiday working). Restrict construction to outside of peak holiday season when maximum access to the beach and shoreline will be required.

5.0 HIGHWAYS IMPACT

- 5.1.1 One of the most significant issues in terms of local impact from the proposed development is that of its impact on traffic and highways in Portsmouth. This section considers the transport assessment and addresses those impacts from the Council's view in particular from its perspective as local highway authority ('LHA'). The LIR has approached this by considering the following documents:
- The ES Vol Transport Assessment ('the TA')
 - The Framework Traffic Management Strategy (ES Appendix 22.1A)
 - The ES Vol 3 Appendix 22.2 Framework Construction Traffic Management Plan
 - Technical Note ERTN01 – Eastern Road Further Traffic Assessments
- 5.1.2 The applicant's Transport Assessment ('the TA') is set out in ES Vol3 It has been developed to reflect the scoping opinions of the statutory consultees, including comments made by PCC during the PEIR process and to reflect further comments made against the TA and SRTM scoping notes.
- 5.1.3 The onshore cable route spans from the proposed Lovedean converter station to the proposed landfall location at Eastney. The proposed order limits for the onshore cable routes has been narrowed since the initial meetings held with AQUIND (and their representatives) however the limits are still relatively broad and provide little certainty as to the likely final route. It is confirmed in para 1.3.5.3 that the final cable route choice will not be decided at the examination stage or by Aquind but by the contractor(s) who have not yet been appointed to construct the cable route.
- 5.1.4 This makes it impossible to assess the construction implications of the project except on a very wide basis upon a number of different assumption and thence determine if those are acceptable or how they may best be mitigated.
- 5.1.5 Once constructed, the only infrastructure along the cable route that will be visible in Portsmouth are the joint bays (there will be a building at the Landfall site). These joint bays are to be used to pull the cables through and join the sections together and will provide access during the life of the development for maintenance purposes. However, similarly to the cable route, the locations and even number of joint bays are currently unknown. It is suggested in 1.3.5.4 that the joint bays will be located preferably in highway verges, fields or car parks and be anywhere between 600m and 2km apart; however the final positions of these again are also to be determined by the contractor(s) yet to be appointed to construct the development.
- 5.1.6 The methodology for the cable installation is understood. This is predominantly by open-cut trench with up to 6 sections of HDD/trenchless

installation used to cross areas unsuitable for trenching (including beneath Langstone Harbour/Farlington Marshes).

- 5.1.7 It is suggested that in-highway construction would progress at a rate of 100m per week with flexibility with regard to the footprint of the works to ensure sufficient width is maintained for road users, which is welcomed. However, TA para 1.3.5.9 suggests that the final route "will be dictated by, amongst other factors, existing services" It is not clear what work (ECI, stats enquiries etc.) has been carried out to ascertain the positioning of services which would allow the applicant to give greater certainty as to the final location of the cable route. Also, if considering the worst case scenario, as this review must do, should highway trenching progress at just 18m per day (the lowest end of the estimated rate of progress) then only 90m would be achieved in 5 days thus potentially extending the projected programme.
- 5.1.8 The order limits are described for each section in the TA, most of these whilst they are fairly broad however have a singular area identified for the cable installation. Sections 5 & 8 have alternate options for cable routes, these sections are at Farlington and A2030 Eastern Road (adjacent to Milton Common). Section 5 is split with the option to use some land within the ownership of Portsmouth Water for one circuit with the second circuit within Farlington Avenue. Whilst it is understood from discussions with the applicant since submission that this is their preferred routeing however the final location will (again) be determined by the contractor.
- 5.1.9 Section 8 of the route is more uncertain with the ground conditions in the preferred location, within Milton Common, seen as high risk. Therefore the applicant has also considered a second route which continues the cable along A2030 Eastern Road before cutting through Eastern Avenue and along Moorings Way.
- 5.1.10 The Council considers that this would clearly be significantly more disruptive to traffic but also to residents living in this area and it is not acceptable that the final route is still unknown at this stage considering how different the impact might be upon residents. It is in addition not clear what 'incentive' there will be for the contractor to use the preferred route, rather than simply choosing to take the lower risk route which throughout the consultation process was largely publicly set aside, with Milton Common having been championed by the applicant as the preferred route.
- 5.1.11 TA section 1.3.7.9 states that a "new formal access arrangement will be required for the ORS Building located in the public car park south of Fort Cumberland Road, and will be designed to appropriate standards and will follow all relevant visibility splay and tracking requirements and subject to a full Road Safety Audit prior to approval with PCC". This suggests that a new road access to the highway will be required rather than accessing the compound from the car park. However no details or plans of such an access

have been presented to PCC either during pre-application consultation or within this DCO submission.

5.1.12 TA section 1.3.10. refers to the various construction activities required to build the final cable route.

5.1.13 TA Paras 1.3.10.1-5 relate to the trenching that will be needed to lay the majority of the cable ducts. Specifically, 1.3.10.3 states "a significant proportion of the route will be within the public highway and typically one trench will be opened and reinstated before the second trench is opened in any particular section"; it has been communicated to the Council throughout the pre-application consultation that the applicant may instruct several contractors to undertake the works should the development be consented however it is not clear how these various contractors will be coordinated. If various contractors are not centrally managed and programmed by either a lead contractor or the project delivery team, the Council is concerned that there is a risk that contractors will compete for road space at conflicting times. Whilst the above statement presumes that trenches will not be worked on simultaneously, it is not clear if or how the applicant could control this.

5.1.14 TA section 1.5 details the traffic routes that are likely to be affected by the installation of the cable route, either due to the direct impact of the cable installation or as a result of traffic diverting to avoid the works site. A number of ATC surveys were carried out on these roads to measure the existing traffic volumes and concentration of HGV traffic. Generally the results presented look to be reasonable benchmarks for each routes relative importance to traffic movement. The one exception being Portsdown Hill (site 1) which shows just 6 two-way movements in the AM peak and 5 in the PM peak. Whilst I would not expect this to be heavily trafficked, these figures seem much too low considering the survey conducted to the East of the A3 junction recorded 1098 and 1499 movements in the AM & PM peaks respectively. Whilst a significant proportion of these trips would likely route via A3 London Rd, the Council considers the notion that 99.5 & 99.7% of trips recorded at survey site 2 would not also travel through survey site 1 is not a reasonable one .

5.1.15 TA section 1.6 outlines the existing sustainable transport network that is likely to be impacted by the cable route. There are 2 routes of the National Cycle Network (NCN) that are likely to be affected; a small section of route 2 that follows the southern coastline of Portsea Island, and a significant section of route 222 which routes along the eastern coastline alongside Langstone Harbour. Much of route 222 utilises the coastal path and shared footway along the A2030 Eastern Road. It is heavily used by both commuters and leisure cyclists with more than 500 cyclists regularly using the route daily. The cable route is likely to affect "the majority of the sections of Route 222.." that are in the vicinity of the proposed order limits. In some areas where the cable

route is to be laid in carriageway, there will likely be a need to stop/limit access to the shared footways during the works. The accident analysis included within the TA highlights a number of accidents along the A2030 corridor involving cyclists, it is therefore expected although not committed that any cycle routes directly impacted will be re-provided to ensure a suitable provision is retained as there are not viable diversion alternatives for any displaced cyclists.

5.1.16 TA sections 1.8 & 1.9 provide a summary of the Framework Construction Traffic Management Plan and Framework Traffic Management Strategy, these documents are addressed later.

5.1.17 TA section 1.10 details the traffic assessment methodology used to conduct the assessment of the likely highway network performance during the proposed works. This builds upon the SRTM scoping note submitted to and agreed by PCC in 2019 detailing the modelling approach using the strategic transport model covering the Solent area. A "worst case" scenario of 6 sections of the possible route that could feasibly have works taking place simultaneously were put forward by the applicant in the scoping note to be tested; two scenarios were ultimately tested with the expected closure at A2030 Eastern Road (between Burrfields Road & Airport Service Road) in scenario "Do Something 1" replicating a southbound lane closure, and in "Do Something 2" replicating a northbound lane closure. This is because lane closures on each carriageway are expected due to the lack of alternative cable route options in this location. Lane closures at A2030 Eastern Road (south of Tangier Road) have not been tested despite being included within the order limits, it is therefore assumed that it is not intended to carry out these works at the same time as the other sections included within the "Do Something" scenarios. A further Technical Note has been produced by the applicant to address the potential closure of a lane south of Tangier Road which is discussed at section 5.0 of this review.

5.1.18 A number of junctions were identified for assessment within Portsmouth in the SRTM scoping note, all of which were agreed by PCC Highways. Section 1.10.4.4 outlines further junctions that were identified following the SRTM modelling that showed significant increases (>10%) in traffic and that that junction showed a volume/capacity (V/C) ratio of above 100% in one or both of the "Do Something" scenarios. I would agree that the identified junctions are already operating close to their practical capacities and therefore it is likely that in the forecast year, the performance of these junctions will deteriorate.

5.1.19 TA section 1.11 outlines the findings of the SRTM modelling exercise; the cable route has been split into "zones" each of which has been reviewed to analyse where diverted traffic is likely to re-route. TA section 5&6 covers the Farlington area with sections 7 to 10 covering Portsea Island. Link capacity assessments have then been carried out on the identified diversion links and sifted in line with guidance from GEART used for the EIA previously carried

out. This is a reasonable approach and identifies several links to be assessed for their suitability to be used as diversionary routes assigning a RAG rating. Those routes rated Red are as a result of that route either being unable to accommodate additional traffic levels or for being a lower order street than that closed. Broadly, the Council would agree with the ratings assigned to the identified streets in section 5&6 given many are residential roads; the Council does not concur that Station Road, despite its available capacity, is suitable to accommodate an additional 217 vehicles in the PM peak hour as is suggested would be the impact. Given the wholly residential nature of the route and proximity to Springfield School, this would not be appropriate albeit it is conceded that measures to prevent this would be challenging to implement without further impacting upon the residents of that road.

5.1.20 TA sections 7-10 identify significantly more roads that are likely to experience additional traffic as a result of the works; this is in part as the study area is significantly wider, but also as the volume of traffic from the affected road is considerably greater than that in the previous study area (section 5&6). The majority of streets (11/18) in this section are identified as arterial type routes with the remaining 7 being residential streets; none of the streets have been assigned a Red rating. All of the residential streets have been assigned amber ratings as they are lower order routes than the closed road and/or would be at/over capacity during the "Do Something" scenarios. The two residential roads predicted to be over capacity are Derby Road and Gladys Avenue; these are identified as having a higher degree of movement than other typical residential roads owing to the wider nature of the road and direct link between A-class routes.

5.1.21 Other residential roads identified are typical of the grid system of roads found in this part of Portsmouth and as such much of the traffic is forecast to split across these roads. It is stated at TA para 1.11.6.61 that "In terms of mitigation, the FTMS will include measures to sign the residential streets as access only. Temporary stopping up orders could also be considered as a means of physically preventing redistributing traffic from using a certain road."; if this is to be the case, there will be significant number of vehicles having to use those routes deemed to have a "higher movement function" rather than those such as Paulsgrove Road that is given as an example of the residential road most impacted with nearly 3 additional cars per minute using it. Whilst acknowledged that none of these residential roads are "wholly appropriate" to accommodate diverted traffic, the Council would agree that the level of increase across each of the roads would not cause a safety risk or severe capacity issue albeit would likely result in increased noise and air pollution for residents. As such the Council would agree that these roads should be appropriately managed; however if this is to be done, the modelling will need to be revisited at the time temporary stopping up orders are considered to ensure the bulk of diverted trips on these roads are reallocated to the higher order routes that would have to convey this traffic instead.

- 5.1.22 The TA also then considers journey time changes across the cable route, the worst increases in journey time during the AM peak period occur outside of the Portsmouth network however one route (A2030) has a predicted increase of 60seconds in the northbound direction in the DS1 (northbound closure) scenario. This delay reduces to approx. 35s in the DS 2 (southbound closure) scenario with other affected routes on Portsea Island predicted to experience negligent delays of no more than 12s (Copnor Road in DS2 scenario). During the PM peak period, the delay areas are broadly the same however the scale of delay is increased reflecting the increase in the base journey times over the AM peak. The largest increase in journey times is again at the A2030 during the DS2 scenario, however in the PM peak the largest increase is for southbound traffic with approx. 153s added to the average journey time. Copnor Road southbound also is predicted to experience an increase in excess of 1min. All other affected routes have increases less than 1min during the PM peak. The identified areas are broadly reflective of known areas of congestion during peak periods and therefore disruption on parallel routes will inevitably result in increased journey times in these locations.
- 5.1.23 TA Section 1.12 details the local junction modelling undertaken on the junctions identified in section 1.10. The method of testing these junctions has previously been agreed with the applicant; signals junctions have therefore been tested using LinSig and priority/roundabout junctions have been tested with the Junctions 9 package. An assessment of the expected practical reserve capacity of each junction has been produced for the future year 2026.
- 5.1.24 Of the junctions tested along the cable route, all are proposed to operate within their Practical Reserve Capacity (PRC) in both the Do Minimum and Do Something scenarios with the exception of one junction; Eastern Road/Burrfields Road is predicted to operate slightly in excess of its PRC in the Do Minimum scenario but still within the theoretical capacity of the junction. I would broadly agree with the findings of these models, several of the junctions are busy and approach capacity during peak periods however generally operate reasonably well. What is not clear is how/if exit blocking has been treated in the models, as this is a particular problem from some of the junctions along the cable route. This is a symptom of the constrained network where the A2030 (south) joins the A27 (Farlington) roundabout often causing queuing back to (and beyond) the Anchorage Road junction; therefore the performance of this junction is reduced by the downstream junction.
- 5.1.25 One priority junction was tested; this was the T-Junction at Eastern Road/Hayling Avenue. Whilst the main road (Eastern Road) proved to operate easily within capacity, some spurious results were reported by the model for the Hayling Avenue arm (DM & DS2) reflecting the inaccuracy of models once PRC is exceeded. This is likely due to the right turn movement being difficult to replicate in the model given the high volume of traffic recorded at Eastern Road and as such, unrealistic queues and delay have been reported. Having

experience of the area, this is not the case and these results reflect the limitations of the model.

- 5.1.26 The broad theme of the model results along the cable route suggest that the performance of junctions may marginally improve due to the throughput of traffic reducing as a result of traffic diverting away from the works. The local models however do not effectively account for reduced capacity of downstream links (and exit blocking caused as a result) or cumulative residual impacts of traffic merging to pass-by works. It is therefore likely that junctions and the links subject to works between them will operate less favourably than suggested by the models.
- 5.1.27 Several further junctions in Portsmouth have also been assessed that lie off of the cable route but are expected to experience increased traffic as a result of diverted trips avoiding works on Eastern Road. The modelling showed that many of these junctions are expected to be operating in excess of PRC in the forecast year (2026), some also in excess of theoretical/actual capacity. These junctions are all known to experience capacity issues during peak periods, therefore the degree to which each junction is impacted is of significant importance. This is especially the case a number of the junctions highlighted will be subject to upgrade works through the PCC bid to the Transforming Cities Fund; upgrades that must be delivered by March 2023 thus conflicting directly with proposed AQUIND works.
- 5.1.28 Most of the junctions, although worsened in at least one of the peak periods, suffer a negligible impact as a result of diverted trips. That said, three of the junctions (Copnor Road/Burrfields Road; Milton Road/Velder Ave; and Church Street/Mile End Road RAB) are already forecast to operate significantly in excess of capacity and as such any additional traffic loaded onto those junctions could be classed as severe. I would however question the results for the Portsbridge Roundabout junction as the stated queue during the morning peak period (Do Min) is just 9.4 pcus when in reality the queue is known to extend beyond the length of the slip road on a daily basis. Even in the two "Do Something" scenarios, the predicted queue length is extended by a maximum of 7 pcus (16.3 total) which would still be well short of the total slip road length and therefore not reflective of the actual road conditions. It is therefore a concern that the model has not been adequately validated and as such the results for this junction are inconclusive at this stage. Having said that the effect is likely to extend the queue beyond the slip road onto the main carriageway increasing the risk of shunt type accidents.
- 5.1.29 Section 1.12.6 continues with Linsig modelling results of the proposed shuttle-working sections. There are 5 sections within Portsmouth that will utilise shuttle signals, these are mostly non-strategic roads with relatively low traffic flows the exception being Portsdown Hill Road. Previous instances of lane closures in this location has resulted in significant queues, this is broadly reflected within the modelling results however this will be significantly worsened should there be an incident on the SRN. It is likely that some traffic

will divert away from this closure and as such it will be important to ensure the closures at Havant Road do not occur simultaneously. Aside from this, the other locations tested are unlikely to cause significant disruption to the wider network.

- 5.1.30 Section 1.13 deals with impacts upon sustainable transport networks including bus and walking/cycling. Table 181 at section 1.13.1.4 details the various bus services that will be directly disrupted by the proposed cable route - 9 of which originate/terminate in Portsmouth and provide connections both within the City and to neighbouring areas.
- 5.1.31 The disruptions in some areas, particularly at the A3 London Road will disproportionately disadvantage bus services given the use of an existing bus lane to run the cable circuit(s). Services will lose existing on-road priority given to buses and have to travel amongst general traffic and as a result likely cause delays to services inconveniencing passengers and potentially resulting in operators needing to increase the number of vehicles on the road to maintain headway. The A3 corridor is also a key focus of the committed schemes (funded by Transforming Cities Fund) to provide rapid transit services into Portsmouth, the delivery period of the funding ends in March 2023 and therefore will likely be affected in some way by these works.
- 5.1.32 Aside from the direct impact of the cable route, the redirection of traffic across the city of Portsmouth will increase congestion and delays. This will also impact upon bus services across the city, especially those using the 3 key routes of A288 Copnor Road & A2047 London Road; both of which have junctions predicted to be impacted by the construction of the development. This specific delay to bus services, either along the cable corridor or in the wider impact area, has not been assessed.
- 5.1.33 Paragraph 1.13.1.20 states "It is possible that the temporary works may have a limited impact on a short section of shared footway/cycleway on Eastern Road.". This section of cycleway is heavily used by both commuting and leisure cyclists, the number of users has risen significantly during the Covid-19 "lockdown" period and as a result any closure of cycle routes will disadvantage a considerable number of cyclists. Further, the paragraph goes on to say "The impacts are likely to be minimal due to the existing width of Eastern Road being sufficient to allow space for safe, alternative footways and facilities to be provided to pedestrians and cyclists for a short period of time if required."; I would contest this assertion as in many sections of A2030 Eastern Road there is no alternative route and along large stretches of the road there is no footway on the western side of road. It is therefore not clear how it will be possible to retain walking & cycling routes along A2030 Eastern Road during construction if the footway is needed for installation of a cable circuit or as safe working area for the same.
- 5.1.34 Paragraph 1.13.1.21 goes on to address similar measures to close footpaths during construction of the cable section alongside Milton Common. The scale

of which will of course depend on which route the applicant intends to take, however it is suggested that it "is likely to include temporary diversions for the footway/cycleway and temporary crossing facilities." Any crossing facility over A2030 Eastern Road will need to be signalised due to the volume and speed of traffic. It is not clear if these will be included within existing junctions or additional facilities which will also have a further impact upon the expeditious movement of traffic as well as cause inconvenience to active travel modes.

5.2 Summary

- 5.2.1 The order limits proposed are still too wide and the possible variables for the cable route, especially those at section 7/8/9 (along A2030 Eastern Road), give scope for significant difference in impact upon the Highway Network.
- 5.2.2 The number and location of joint bays are still unknown. Whilst it is suggested that the intention is to place these "off-carriageway", like the cable route, this will ultimately be decided by the contractor or contractors whom have yet to be appointed. Unlike the cable route, no suggested locations have even been given for these joint bays and as such their impact is impossible to assess.
- 5.2.3 It is not clear what, if any, early contractor involvement has been carried out to define the route. The applicant may wish for the route to be laid through off-carriageway areas where possible however where difficulties around land ownership or contamination exist, it is unclear what will incentivise potential contractors to follow these routes.
- 5.2.4 No engagement has been carried out with the LHA with regards method of access to the ORS compound.
- 5.2.5 The impact upon cyclists and Pedestrians using A2030 Eastern Road is likely to be significant, it is unclear how or if this impact can be mitigated.
- 5.2.6 The traffic modelling has been carried out in line with the scoping note previously submitted to and agreed by the LHA. In line with this approach, the applicant has attempted to replicate a "worst case" scenario. However, the modelling does not cover a possible cable route along the A2030 between Tangier Road and Eastern Avenue nor does it account for cumulative residual impacts of traffic merging to pass-by works or diverting away from works. It is noted that SRTM does make an assumption as to the redirection of traffic however it does not accurately predict vehicle movements at a microscopic level and as a consequence, the overall impacts of the works are likely to be greater/wider than anticipated. Note: the applicant has attempted to address this with the production of a technical note (ERTN01) and is discussed at section 5.0 of this review.
- 5.2.7 The junctions highlighted as experiencing a material change in traffic flow as a result of traffic diverting away from the works are broadly as expected although one in particular (Portsbridge Roundabout) has returned results that are not in my view, credible. Further, many of these junctions are included in the infrastructure schemes committed as part of Council's successful

Transforming Cities Fund (TCF) bid. Therefore, it is highly likely that the works related to this development could impede the delivery of, or increase disruption around, junction improvement works related to TCF. These works would be carried out between Jan 2021-March 2023.

- 5.2.8 It is unclear what the impact upon sustainable transport will be, both in terms of delay to bus services but also what walking/cycling facilities might be impacted and when.
- 5.2.9 The traffic modelling does not consider the highway safety implications of extended queue lengths or traffic diversions within the network which is a fundamental omission in the impact assessment preventing a clear understanding of the construction impacts and mitigation options.

5.3 ES Appendix 22.1A Framework Traffic Management Strategy - 6.3.22.1A

- 5.3.1 A Framework Traffic Management Strategy (FTMS) has been produced to accompany the Transport Assessment. This sets out the intended approach to traffic management that appointed contractors will be expected to work within throughout the duration of the works.
- 5.3.2 The FTMS acknowledges key periods/dates throughout the year where works on the network would cause additional stress/conflict on the network including various events, school term times and the Football season. Whilst this is welcomed, the constraints on working during peak periods are not recognised. There are various events through the summer months that would be impacted by lengthy works especially on the A2030 Eastern Road, therefore weekend closures on this route should be avoided.
- 5.3.3 Section 2.8 of the FTMS covers the communications strategy, and details the key stakeholders that will need to be communicated with during the construction of the development. The provision of a dedicated Comms officer for the project is welcomed, it is expected that this individual works closely with PCC's own Comms team to agree the appropriate messaging to put out and the timeline for this.
- 5.3.4 FTMS section 2.9 covers the impact upon pedestrians and cyclists, at 2.9.2.1 it is stated that the minimum width of footway provided will be 1.0m past works. Where a footway closure is required, and no alternative can be placed nearby or on the opposite side of a road, a carriageway route will be provided, again of a minimum width of 1.0m. This is too narrow and does not facilitate access for wheelchair users or pushchairs, therefore a minimum of 1.2m should be provided at all times.
- 5.3.5 FTMS section 2.9.3 details for the closure of cycle routes is outlined, where cycle routes are closed or diverted it is suggested that a width of 2.5m will be maintained where possible, this is acceptable. However the section goes on

to suggest that in some areas shared footways may need to be "pinched" down as low as 1.0m, in this instance cyclists will be asked to dismount and use the footway for the length of the closure. It is highly unlikely that this will happen, especially at A2030 Eastern Road, given the number of cyclists that use the National Cycle Route. A route suitable for two-way cycling should be maintained to ensure the safety of all road users.

- 5.3.6 FTMS section 2.12 details the intended Responsive Traffic Management Protocol to manage works and respond to ad-hoc incidents/events. The LHA would support such an initiative and will be especially important on Football match days and through the summer months when traffic levels increase significantly at weekends, especially when there are events (other than the major events listed in section 2.7) on the seafront; typically these run from April/May to September. In addition to this, it will likely be necessary for temporary traffic signals to be manually managed at peak times. The inclusion of a road safety officer as a single point of contact is positive, they would be encouraged to liaise closely with PCC officers and Network Management staff at Colas during the works. They would also be encouraged to make use of the Routes 4U App which details accessible routes for less able pedestrians across Portsmouth, this allows for obstructions (both temporary and permanent) to be mapped and for users to plan an accessible route between destinations.
- 5.3.7 Sections 3 - 12 detail each of the cable sections, with cable sections 5-10 being in Portsmouth (with 2 sub-sections within Cable section 4). Each section, and sub-section, has been considered in terms of possible restrictions on working times and possible conflict with the construction of other sections of the route. These restrictions have in conjunction with projected construction durations for each sub-sections been used to give an outline programme of periods when work could happen. This is however only at a month-by-month level at this stage and is likely to vary considerably in some areas depending on the selected cable route and what working hours are used etc. What is not clear is how the overall programme might look considering many areas will be subject to significant restrictions and need two separate cable trenches that cannot be carried out simultaneously. Further, where cables trenches are being laid by separate contractors it is not clear how road space will be prioritised if the construction window is severely constrained. At this stage, there is insufficient information for the LHA to determine firstly, whether the suggested programme is appropriate, and secondly how other statutory undertakers' (and the LHA's) road space requirements could be managed during the construction period.
- 5.3.8 FTMAS Para 7.3.2.3 suggests that there will be restrictions placed upon access to private residences during the works. It is not clear whether this will be throughout the works or just during working hours and therefore outside peak periods. However it is required that residents retain access to their

properties at all times. This will be especially important where on-street parking is prevented to allow vehicles to pass street works.

- 5.3.9 FTMS Paras 8.1.1.5-7 cover measures that will be required to facilitate the cable route across Fitzherbert Road. This road is extremely busy in part as it is the access to a supermarket but also has a very high number of HGV movements due to the large industrial estate situated along Fitzherbert Road. The management of this section will have to be closely monitored and works should be carried out as quickly as possible due to the impact upon the Eastern Road/Fitzherbert Road/Grove Road junction but also as large vehicles often attempt to use Lower Farlington Avenue to access the estate despite the width restriction in place. This causes significant disruption to the residents in Lower Farlington Avenue and the roads off of it as the roads are highly unsuitable for large vehicles and as such measures to prevent access to traffic besides residents should be put in place.
- 5.3.10 FTMS Section 10.2 details cable section 8 and the possible construction periods for the 3 sub-sections in this area. In the "worst case" scenario, sub-section 8.1 would take 9 weeks per circuit with between 5-14 weeks to undertake this work per calendar year. This window has been calculated based upon the final route for sub-section 8.2, which is unknown, that in a "worst case" scenario could take 10 weeks. Given that the "best case" scenario routes across land known to have significant levels of contamination, it is a distinct possibility that the "worst case" scenario becomes the favoured (or only viable) cable route. In the "worst case" scenario, the works for sub-sections 8.1 & 8.2 would take 9 weeks and 10 weeks respectively; with the other restrictions there would only be 5 weeks and 8 weeks to carry out these two sub-sections per year therefore leaving a deficit. This would result in these works extending into periods that have been identified as unsuitable for working on this route thus highlighting the current level of certainty over cable route options and the impact of that uncertainty upon a possible future programme of works.
- 5.3.11 FTMS Para 12.2.1.3 refers to use of shuttle traffic signals in Henderson Road for a distance of 300m for a duration of approx. 3 weeks. It is presumed the intention is to split this into 3 x 100m sections; 300m is too far for shuttle signals to work effectively and would likely result in long queues and possible safety issues although the intent remains to be clarified.
- 5.3.12 Appended to the FTMS are diagrams showing the extent and possible methods of Traffic Management (TM) that will be required to facilitate the construction of the cable route. These are generally useful to show an outline of the various TM methods that will be needed however detailed TM layout drawings will be required for each sub-section of the cable route. In some areas, it is suggested that pedestrian crossing facilities may be suspended, this should be avoided if at all possible; should this be absolutely necessary a replacement facility will be expected to be provided.

5.4 Summary;

- 5.4.1 No over-arching programme has been provided at sectional (and sub-sectional) level, as a consequence it is not possible to ascertain whether the various assumptions/restrictions applied to each section (and sub-section) will translate to a viable programme. In a "worst case" scenario, some elements of the provided programme would appear undeliverable. It is also unclear how programming will be managed where multiple contractors are engaged to deliver different sections of the route that either cross or are adjoining each another.
- 5.4.2 Where temporary footway closures or diversions are necessary, adequate space to cater for the users of the closed/diverted path must be made. Absolute minimums of 1.0m for a footpath and 1.5m for a shared footway will not be acceptable. Such facilities would pose a significant safety risk to the users of that facility.
- 5.4.3 Access for residents (and their vehicles) to their properties should be provided throughout the works period; this is especially important where on-street parking has also been removed to facilitate works.
- 5.4.4 It is not clear whether the constraint preventing working during peak periods on traffic sensitive routes has been understood by the applicant and this should be reflected in all construction management plans.

5.5 - 6.3.22.2 ES Vol 3 Appendix 22.2 Framework Construction Traffic Management Plan

- 5.5.1 A Framework Construction Traffic Management Plan (FCTMP) has been produced to accompany the Transport Chapter of the Environmental Statement and sets out how construction traffic associated with the development will be managed. This is intended as a framework to show how the final CTMPs for each section will be structured and the general assumptions that have been made at this stage before contractors have been appointed.
- 5.5.2 FCTMP Section 2.4 details the likely requirements around compounds and laydown areas. Para 2.4.1.3 states that laydown areas will be required adjacent to work sites along the cable corridor, as shown in the associated diagram, these compounds will require a significant area however at present there is no indication how many of these might be needed or where these could be accommodated.
- 5.5.3 FCTMP Section 2.7.7 sets out the applicant's definition and approach to the management of Abnormal Indivisible Loads (AILs). In para 2.7.7.1 it is stated that "a vehicle is considered abnormal when.... the gross weight is over 80

tonnes". This is in conflict with the official guidance that states that a load is considered "abnormal" if it is over 44 tonnes. During the pre-submission consultation, the applicants stated on more than one occasion that the cable drums delivered to site when cables are being pulled will likely weigh in the region of 50tonnes and these would likely be needed on a daily basis during the cable pull. There has been no acknowledgement of this in the FCTMP and therefore no identification of routes that would be utilised to make these deliveries and the frequency of those deliveries. The applicant has acknowledged the mistake and promised a technical note to detail the AIL routes as well as frequency of the required AIL movements however this has yet to be presented and therefore no assessment of the possible impact has been possible.

- 5.5.4 FCTMP Para 2.8.4.1 details construction arrangements for the construction of joint bays; the text suggests that a compound is needed for each joint bay however as no number or location of joint bays has been provided within the application it is unclear whether such compounds could be provided.
- 5.5.5 FCTMP Section 3.4 details the HGV routes that would be used to access the various works areas, for Portsmouth this includes the on-shore cable route and landfall at Eastney. There is however no mention or acknowledgement of the Highway constraints of Portsea Island, particularly the weight restrictions of the bridge links to the mainland. The key identified route for construction traffic is via the A2030 Eastern Road (via A27 Farlington Junction). This bridge is subject to a 40tonne weight restriction and therefore would not be suitable for cable deliveries (presuming these are consistent with the previous advice from the applicant's engineering team).
- 5.5.6 FCTMP Para 3.4.9.3 then refers to the revocation of weight restrictions in some roads particularly in section 8 (Eastern Road/Moorings Way). The weight restriction referenced is in effect midnight-0700 and 1900-midnight Monday to Saturday and all day Sunday. It is not clear why this limit would need to be revoked as these times do not clash with times that would be acceptable to carry out construction activities given the proximity to residential properties.
- 5.5.7 FCTMP Para 4.2.1.1 refers to the likely number of construction gangs that will be deployed simultaneously; the modelling work was based upon the presumption that no more than 6 sets of works would be carried out at any time, an assumption that is repeated in this paragraph. It is not clear however that this can/will be controlled; such a scenario has not been modelled and as such the impact is completely unknown.
- 5.5.8 FCTMP Para 5.3.9.1 outlines plans to take over a construction compound that will be used by the Eastern Solent Coastal Partnership (ESCP) during their works to improve sea defences along the Eastern shore of Portsea Island. With these works due to finish in October 2022, this implies that that the proposed development will not begin in this section until after this date. It is

not clear whether or not this has been accounted for in the programme. Any use of this compound by AQUIND (and/or their contractors) should also be subject to any restrictions placed upon ESCP's use of it; it should also be made clear who will subsequently be required to reinstate the ground and any highway access associated with the compound.

- 5.5.9 FCTMP Para 5.3.11.1 identifies the Fort Cumberland car park as being required for construction access for the landfall and ORS building. It's not clear if the entire car park is required, and if not, measures should be taken to control access to the car park. The existing entrance has a height barrier to prevent unauthorised access which should be retained/replicated if the car park is retained in part for public use.

5.6 *Technical Note ERTN01 – Eastern Road Further Traffic Assessments*

- 5.6.1 Following submission of Portsmouth City Council's Relevant Representation ('RR') the applicant has sought to address the comment made by the Council and Portsmouth LHA which was as follows:
- 5.6.2 "The traffic modelling has been carried out in line with the scoping note previously submitted to and agreed by the LHA. In line with this approach, the Applicant has attempted to replicate a "worst case" scenario. However, the modelling does not cover a possible cable route along the A2030 between Tangier Road and Eastern Avenue nor does it account for cumulative residual impacts of traffic merging to pass-by works or diverting away from works. It is noted that SRTM does make an assumption as to the redirection of traffic however it does not accurately predict vehicle movements at a microscopic level and as a consequence, the overall impacts of the works are likely to be greater/wider than anticipated."
- 5.6.3 By way of a response, the applicant has produced a technical note focussed upon the potential impact of the proposed development upon the A2030 Eastern Road and the junction of A2030 Eastern Road/Tangier Road ('the TN' or 'the report').
- 5.6.4 Section 2 of the report outlines the method that was taken in the Transport Assessment (TA), Framework Traffic Management Strategy (FTMS), Environmental Statement Chapter 22 was agreed with PCC LHA and the method of coding the SRTM was agreed with the relevant Highway Authorities. The contention of the LHA was that at the time of agreeing the coding note specifically, the DCO limits were not confirmed and the working assumption was that the cable route would cross Milton Common. Once the DCO limits were finalised, it was clear that there would be a very real prospect of the cable route continuing along A2030 Eastern Road and consequently it was a concern that the worst-case scenario had not been considered.

5.6.5 Chapter 3 of the TN reviews the observed traffic flow data collected through surveys undertaken by the applicant and why this shows that the omission of the potential lane closures south of Tangier Road was/is justified.

5.6.6 TN Section 3.2 highlights an identified error in some of the traffic survey data initially presented within the TA. The data relates to ATC surveys undertaken at Eastern Road and displayed at section 1.5 of the TA. Many of the discrepancies are very minor, the site between Airport Service Road and Burrfields Road is the only site with notable discrepancies as far as I am able to discern. The alterations are as follows.

- Northbound flow; AM +201, PM +63
- Southbound flow; AM +411, PM +799

These figures are significant and as such the applicant should confirm that the amended figures were representative of those tested as part of the model runs and the difference is simply an error in replicating the table. Such a discrepancy in the modelling would be grounds to repeat the exercise given the potential implications of adding up to 799 vehicles into a traffic link.

5.6.7 TN section 3 continues, outlining the link flows of the various highway links along Eastern Road and how the modelled Traffic Management measures on the link (Airport Service Road - Burrfields Road) would affect a greater quantum of vehicles than if the same measures were to be modelled on the link (Tangier Road- Eastern Avenue). This has been demonstrated by the fact that greater number of vehicles were recorded during the survey undertaken on the link between Airport Service Road-Burrfields Road than was recorded by a survey undertaken between Burrfields Road- Tangier Road (validated by a further survey between Euston Road- Velder Avenue). There is also a 24hr weekend flow profile given however it is not clear how this compares to a football match day (or whether the data displayed is from a match day weekend); however the flows given for survey sites 3 & 4 are comparable, if not marginally in excess of weekday flows and as such is considered reasonably robust.

5.6.8 TN section 4 further explores the outputs/results of the macroscopic modelling previously carried out using the Solent Region Transport Model (SRTM) and reiterate why this was/is the appropriate tool to assess the impacts of the traffic management measures required to construct the development.

5.6.9 TN section 4.3 examines both link speed data and journey time of traffic on A2030 Eastern Road. In the AM peak, traffic travelling northbound in the DS2 scenario (northbound lane closure) is predicted to be most adversely affected with a reduction of 78% in link speed. Southbound traffic in the DS1 scenario (southbound lane closure) is less affected with a 44% reduction in link speed. In the PM peak, southbound traffic in the DS1 scenario is by far the worst affected with an approximate link speed reduction of 86%. This relates to the link between Airport Service Road and Burrfields Road, no equivalent data is

provided for Tangier Road - Eastern Avenue; although it is agreed that speed reduction on this link as a result of TM related to the development is likely to be lower for southbound traffic given the already slow speeds that exist at peak times in this location (resulting from existing lane merge). Additionally, changes in journey times are given with a max predicted JT increase in the AM Peak of 1m54s (Northbound, DS2) and in the PM Peak of 4m8s (Southbound, DS1).

5.6.10 Further to this in section 4.3.3., the changes in flows derived from the SRTM as a result of replicating the implementation of TM measures between Airport Service Road and Burrfields Road are given. The results of redistribution are then also given and show all those roads across the city that would see significant changes in traffic flows as a result of the TM measures causing traffic to re-route. Both this data and the link speed/journey time changes is presented by the applicant to show that the modelling undertaken shows the full extent (or worst case) of the impacts upon the highway. It would have been useful to have included graphical delay and v/c plots as are often used to easily show the SRTM outputs and to understand the scale of change in relation to the baseline.

5.6.11 Finally, in TN section 5, the applicant explores the impact of a lane closure through the Eastern Road/Tangier Road junction; a scenario that will occur no matter which cable route option is ultimately selected. The junction has been modelled using LinSig and it is noted that "Traffic flows have been calculated from the SRTM DM and DS scenarios used to assess the temporary impacts of the TM within the TA; and These traffic flows have been combined with local junction capacity model assessments and link assessments to consider the implications of the SRTM modelling at a detailed level." The model results show that the junction is predicted to operate well over theoretical capacity in the PM peak in DS1 (southbound closure) with a reported saturation of 112.8%. In the DS2 scenario, the junction is expected to operate at slightly over the theoretical capacity at 103%. Both of these results are considerably above the Practical Reserve Capacity (PRC) of the junction which will result in increased delay and longer queue lengths. In the DS1 scenario, the queue is predicted to reach 153pcus, equivalent to approx. 900m. It is however noted that the Linsig model is not able to predict redistribution and although some redistribution has already been factored within the derivation of flows used in the model, it is likely given the significant over-saturation of the junction caused as a result of the TM measures that will be required, that there will be additional re-routing of traffic. What is not known is whether the patterns of redistribution as a result of a lane closure south of Tangier Road will reflect that which have been presented having been derived from the SRTM (scenarios DS1&2 - closures between Airport Service Road-Burrfields Road). There is also no reference to road safety implications in relation to the considerable increase in stationary traffic predicted to result from this lane closure on the approach to a junction.

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- 5.6.12 It is the LHA's expectation that where trenches are required within carriageways those will be excavated in the first third of lane 1 thereby allowing traffic management to be pulled in tight to the excavation and preserving 2 lane operation in each direction when works are precluded during peak periods. Subject to detailed traffic management plans this may avoid the need for a lane closure through the junction during peak periods although it is not clear that this constraint and traffic management expectation is understood by the applicant.
- 5.6.13 In summary, this note shows that traffic flows on the Airport Service Road-Burrfields Road link are generally higher than that on the Tangier Road-Eastern Avenue link as such TM measures as already tested in SRTM would affect more vehicles. It also shows, in line with the submitted TA, that traffic will redistribute away from the proposed lane closures and distribute across other routes as a result of significantly reduced traffic speeds and therefore, longer journey times. This is agreed and is not contested – however this is not to say that the results of that redistribution is accepted/acceptable. The note also shows that the Eastern Road/Tangier Road signal junction will be severely impacted by the lane closure that will be required to be put in place through the junction. This will result in significantly longer queues and additional delay to traffic; this is likely to also result in diverted traffic, it is less clear the scale of traffic that will re-route or where that traffic will choose to re-route. Given the lack of major routes south of Tangier Road, it is likely that residential roads will bear the brunt of re-routing bringing increased noise and air pollution. This is more likely in the northbound closure scenario however given the increased opportunities to divert on higher order routes to the north of Tangier Road that would be available during the southbound closure.
- 5.6.14 The Council would agree that a more detailed traffic model of the affected areas of the highway network is not required for what will be temporary, albeit potentially prolonged disruption. However, the strategic model is limited as to the impact (especially upon smaller residential roads) that it can display predominantly as many smaller residential roads are not included within the basemap/coding of the model. One such road that is wholly residential but is included in the model is Paulsgrove Road; at para 2.16 of this review this example is explored further however the intimation in the TA is that the TM strategy will mitigate against use of "residential streets" and make these "access only". If this is to be the case, roads such as Paulsgrove Road that are predicted to see significant uplift in traffic flow will be treated with TM measures and as a consequence the traffic predicted to re-route using that road will need to route elsewhere. With no fixed idea as to if or how residential roads might be treated in a traffic management strategy, it is extremely difficult to predict the scale to which use of these roads as an alternative route will be and what the corresponding impact upon alternative higher order routes (and junctions) might be. Given how close to capacity many of the higher order routes (and junctions along them) do/are predicted to operate,

any additional traffic displaced by supplementary TM measures will likely exacerbate already increased congestion.

- 5.6.15 The modelling work does provide a reasonable indication about how and where traffic might divert to avoid the works associated with the development however it remains the Council's opinion that there will most likely be second and third level impacts beyond that shown by the modelling not least because the road works associated with this development will remove any resilience the highway network in Portsmouth (Portsea Island especially) has. Portsmouth is predominantly an Island city with just 3 road links onto/off of Portsea Island. These routes into the city are effectively severed by the Strategic Road Network (SRN) and are often significantly affected by disruptions on the SRN and vice versa. Ultimately, the works associated with this development will put further pressure on alternative roads and junctions that are already subject to significant stress at peak times resulting in further delays, pollution and longer "rush hour" periods (peak spreading).
- 5.6.16 The information submitted in support of this DCO application does not consider possible mitigation of impacts nor the potential road safety implications of increased congestion along the cable route or identified diversion routes. This is a fundamental omission without which the impacts of increased congestion arising during the construction period on the safety of the highway network cannot be determined.

6.0 CONCLUSIONS

- 6.1 As set above and in all the circumstances, the Council can show to the Examining Authority that the proposed route of the AQUIND interconnector cabling works will have a wide range of highly detrimental local impacts on a number of locations in the City and also have deleterious effects on ecology, the highway network, air quality and the amenities of local residents living in close proximity to the proposed route as well as users of open space land (and the recreational facilities the open space land accommodates) who will be displaced for extended periods of time, for which there is no mitigation to the impacts of the Proposed Development in the dDCO This is so not only as a consequence of the construction works but once operational it would appear that the operator (whether it be AQUIND or future operator) based upon the permanent and wide “New Connection Rights” sought mean that future disruption in order to maintain the cable(s) will also be highly detrimental to users of the land as well as those with higher rights.
- 6.2 In addition, 'Users of open space land (and the recreational facilities the open space land accommodates) will be displaced for extended periods of time, and there is no mitigation to the impacts of the Proposed Development in the dDCO.