AQUIND Limited

AQUIND INTERCONNECTOR

Applicant's Response to Local Impact Reports

The Planning Act 2008

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

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13. COMMENTS ON HAVANT BOROUGH COUNCIL LOCAL IMPACT REPORT 13-185

1. INTRODUCTION

1.1. PURPOSE OF THIS REPORT

1.1.1.1. Local Impact Report's ("LIR's") were submitted in accordance with the requirements set out in the Planning Act (the '2008 Act') and the Planning Inspectorate's (the 'Inspectorate') Advice Note One: Local Impact Reports (republished April 2012, (version 2).

1.1.1.2. Six LIR's were submitted separately by the following Local Authorites

- Portsmouth City Council ("PCC") – (REP1-173)
- Hampshire County Council ("HCC") – (REP1-167)
- Winchester City Council ("WCC") – (REP1-183)
- South Downs National Park Authority ("SDNPA") – (REP1-178)
- East Hampshire District Council ("EHDC") – (REP1-161); and
- Havant Borough Council ("HBC") – REP1-169

1.1.1.3. The Advice Note states that the "content of the LIR is a matter for the local authority concerned as long as it falls within the statutory definition". The LIR should consist of a statement of positive, neutral and negative local impacts.

1.1.1.4. The Advice Note states that when the Examining Authority (ExA) decides to accept an application it will ask the relevant local authorities to prepare a LIR and the relevant local authorities should prioritise preparation of their LIR irrespective of whether the local authority considers the development would have a positive or negative impact on the area. The LIR may include any topics that it considers to be relevant to the impact of the development on its area and will serve as a means by which its existing body of knowledge and evidence on local issues can be fully and robustly reported to the ExA.

1.1.1.5. This report sets out AQUIND's Limited (the 'Applicant') response to the local impacts identified in the LIR's, in order to ensure that local issues and impacts are identified, understood and carefully addressed and to aid the ExA in its consideration of the proposal.

1.1.1.6. This document, submitted for Deadline 2 of the Examination, contains the Applicant's responses to the identified LIRs in paragrpagh 1.1.1.2.

2. APPLICANT'S COMMENTS ON PORTSMOUTH CITY COUNCIL LIR

2.1. INTRODUCTION

2.1.1.1. This section of the document contains the Applicants response to PCC's LIR (REP1-173).

2.1.1.2. The Applicant has structured their response in line with the LIR submitted by PCC.

2.1.1.3. The Applicant has provided responses to points where it is considered this will assist the ExA in considering the point raised in the LIR.

3. COMMENTS ON PORTSMOUTH CITY COUNCIL LOCAL IMPACT REPORT

3.1. APPLICANT'S COMMENTS ON PORTSMOUTH CITY COUNCIL LOCAL IMPACT REPORT

Table 3.1 - Applicant's Comments on Portsmouth City Council Local Impact Report

Para No.	Local Impact Report Statement	Applicant's Response
1.3 Policy Context		
1.3.4	Advising new Local Plan preparation and timetable, envisaged to be published for consultation early in 2021, with Publication Draft in Spring / Summer 2021 and adoption Summer of 2022.	The Applicant notes the timetable for the publication of the draft (new) Local Plan. It is noted that the Examination is scheduled to have closed by the time at which a consultation draft is first published.
2.0 Matters of Common Concern		
2.1	Four areas of common concern are identified with the Borough of Havant, Winchester City Council and Hampshire County Council, comprising disruption to the highway network, loss of open space, loss of playing pitches, lack of adequate consideration of alternatives.	The comment is noted, and responses will be provided within the document as appropriate. Responses to concerns raised by the other authorities mentioned are responded to in the respective response documents submitted by the Applicant.
3.0 Local Impacts – Route Impact Generally		
3.2	**Southsea Leisure Park**	
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.	Southsea Leisure Park is accessed from the western side of Melville Road, and as such there is no direct impact on residents entering or exiting the site. More generally with regard to disturbance, para 24.6.11.20 of ES Chapter 24 Noise and Vibration (APP-139) identifies the potential for a minor adverse (not significant) effect associated with the HDD on Southsea Leisure 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	The power authorising the acquisition of rights is Article 23 of the dDCO (REP1-021). This provides that the undertaker may acquire compulsorily the rights, and impose the restrictions, over so much of the Order land described in the book of reference and shown on the land plans as is required for the construction, operation or maintenance of the authorised development or to facilitate it, or as is incidental to it. This article ensures there is a test of necessity, with rights only able to be acquired over so much of the land as is required for the various purposes. The Book of Reference (REP1-027) identifies the plots in relation to which the rights may be acquired, with the area of the land over which those rights may be acquired detailed in the Land Plans (REP1-011a). The Book of Reference has been updated to include further detail on the sub-classes of the rights within each rights class that may be acquired.

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	works not giving rise "materially new or materially different environmental effects" than in the ES.	The Order limits provide a limit of deviation within which the Proposed Development may be located. The Order limits provide a necessary and proportionate level of flexibility so as to ensure the Proposed Development may be constructed and operated/maintained without impediment. It is not the case that rights over the whole area identified will need to be acquired, or that this would be authorised noting the comments above in relation Article 23 of the dDCO (REP1-021). The Applicant will be required to confirm the area over which permanent rights are to be acquired for the stated purposes at the appropriate time, which in relation to operation and maintenance will be once the installation of the Onshore Cables has occurred, or where necessary once the detailed design has been approved in accordance with Requirement 6 to the dDCO (REP1-021). With regard to the definition of maintenance, the definition includes all such matters as may be necessary in connection with the maintenance of the Proposed Development. The scope of the definition is not in any way unusual, and it should be noted accords with the same definitions provided for in many DCOs. It should be noted that in general maintenance activities will be minor, with cable failures a very rare occurrence. Monitoring will be undertaken from the above ground link boxes and link pillars, as is explained in the ES. It is noted, as PCC has acknowledged, that only those maintenance activities which are within the scope of the EIA will be permissible. Taking into account all of the above, the Applicant's position is that it has taken a proportionate approach to defining the Order limits and that the Articles authorising acquisition are adequate to ensure that rights are only permitted to be acquired over so much of the land as is necessary for the required purposes. It is not considered any amendment is necessary to these powers or the approach, which aligns with the approach in many DCO's which include a linear form of development and for which a limit of deviation is necessary.
3.3	**The Car Park at Fort Cumberland**	
3.3.1 - 3	PCC indicate there will be heavy impacts of the landfall location within Fort Cumberland Road car park, and refer to the siting of the two Optical Regeneration Stations. Fort Cumberland Road car park details of the anticipated location and duration of impact is, according to paragraph 3.6.4.56 of ES Chapter 3, detailed in Table 3 of Appendix 3.5, however there is no Table 3.	This is an error as there is no Table 3 in Appendix 3.5. However, information regarding the duration of works can be found in Table 3.6 of ES Chapter 3 (APP-118). In addition, a detailed description of the Landfall is provided in section 3.6.5, which can be read in conjunction with the Indicative Optical Regeneration Station(s) Parameter Plan (REP1-009). The Applicant also refers to Appendix B of Framework Management Plan for Recreational Impacts (REP1-144) submitted at Deadline 1 for indicative phasing of works at Fort Cumberland car park. It is not entirely understood what is meant by 'heavy impacts', but the Applicant's position is that the buildings necessary to be provided for optical regeneration purposes in proximity of the Landfall are proportionate to their function in terms of scale, have been sensitively sited in an existing car park area, and adequate mitigations are included to mitigate their impact.

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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.	The Applicant can advise that Fort Cumberland Road is able to accommodate the construction corridor and retain two-way traffic through the use of single lane closures with shuttle working traffic signals. During these works Ferry Road would either be temporarily closed at the junction with Fort Cumberland Road or provided with temporary traffic signals / road plating to maintain access. If Ferry Road is temporarily closed a signed diversion route will be provided via Gibraltar Road and Lumsden Road. Pedestrian and cycle access will be maintained at all times. The Applicant refers to section 12.3 of the Framework Traffic Management Strategy (REP1-068)which sets out the measures that are required to be implemented to mitigate the impacts identified by PCC with regard to access to SensePlus Portsmouth.).
3.5	**Bransbury Park Recreation Ground and Skate Park**	
3.5.1 - 4	Bransbury Park has general local use, and has a skate park, and 3 football pitches hosting approximately 54 games (with 33 teams) in a season, with 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 which PCC consider to have significant effect on the use of the pitches and ability to complete league fixtures. Associated loss of revenue. Advise works have been estimated at approximately 12 weeks PCC assumes this does not include re-instatement times of approximately 3 to 6 more months, and advise the pitch would be out of action for up to 9 months.	Section 4.2.4 of the Framework Management Plan for Recreational Impacts (REP1-144) covers Bransbury Park. With regard to the period of reinstatement the FMP recommends that re-turfing is undertaken for sports fields which would take 8 weeks. The ES assumes that cable installation would take 12 weeks in total at Bransbury Park, including a joint bay in the car park. The FMP clarifies that the cable installation itself will take 8 of the 12 weeks. The FMP also demonstrates that while the Order limits affects one of the three football pitches at Bransbury Park, there is space to realign the affected pitch and avoid impacts. The comment in relation to loss of revenue is noted. The Applicant will further discuss the revenue that it is anticipated to be lost. It is noted that adequate provisions regarding the payment of compensation in accordance with the relevant statutory processes are provided for within the dDCO.
3.6	**Milton Piece Allotment Gardens**	
3.6.2 – 6, 8, 10 - 12	Consider if the construction works comprises drilling under the allotments, it appears there would be little or no impact on the allotments. However, Permanent New Access Rights and New Connection Rights are proposed, and PCC raise concern that the allotment land will not only be subject to potential disruption during construction but also once operational with the "right to install" and "operate…the underground electrical and fibre optic cables" and "maintain" the cables (see §6.1.6 of the Statement of Reasons Doc Ref 4.1). The rights sought by means of compulsory acquisition powers reserves the right to open dig through the allotments, and the ES at § 3.6.4.46 (doc ref 6.1.3) describes during construction "access will be required over the paths within the Allotments during	The Applicant confirms, as PCC is aware, that the works to locate the cables beneath the allotments will be undertaken via HDD. This method of construction in this location is secured in the Onshore Outline Construction Environmental Management Plan (REP1-087). The Land Plans (REP1-011a) have been corrected to remove the potential for access rights over the individual allotments plots. Access will only be taken over the existing paths within the Allotments. The Applicant also confirms that in relation to maintenance of HDD sections, all maintenance is to be undertaken from the joint bays at either end of the HDD and not on the Allotments.

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	installation works for monitoring purposes" with no limit is set out as to how access is to be gained to the cables once installed other than via the surface with the potential to disrupt allotments and allotment holders, the roadways, car park and entrance area. There is no detail provided as to what this permanent easement sought entails but consider rights sought currently mean that AQUIND or any successor would be permitted access to allotment plots at any time, including the right to excavate these plots throughout construction and in future to access the cables.	The extent of the rights and restrictions applicable are detailed in the Book of Reference (REP1-027), which PCC may wish to refer to.
3.6.7, 9	Concern that the potential disruption does not appear in fact to have been explained either to the Allotment Association and/or the tenants directly, and 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.	Representatives of the Applicant provided a presentation to members from the Allotment Holders Association, including Committee Members, on 22 November 2019, to provide an overview of the Proposed Development and answer any questions from the attendees. At that presentation it was clearly stated that the Onshore Cable Route would be installed under the Milton and Eastney Allotments using horizontal directional drilling (HDD) and not by open trenching. The presentation also provided details about the DCO process including the period within which parties could register as Interested Parties. A Briefing Note in relation to the DCO Process was also distributed to attendees. The presentation and Briefing Note were sent to the secretary of the Allotment Association on 25 November 2019 along with contact details for the Applicant in case of further queries and an offer to hold a follow up meeting at a later stage should it be of benefit. A copy of the presentation and Briefing Note are provided as an appendix to the Applicant's Responses to the Written Representation (document reference 7.9.5). The Applicant provided a presentation to numerous representatives of the Council on 28 September 2020. During this presentation the Applicant clearly reconfirmed the Onshore Cable Route would be installed under the Milton and Eastney Allotments using horizontal directional drilling and not by open trenching. The Applicant also provided further information in relation to a correction of the Order Limits at Plot 10-13 of the Land Plans (APP-008) which has subsequently been updated at Deadline 1. The Applicant sent details of the updates to the Order Limits by email to two members of the Allotment Holders Association Committee on 02 October 2020. This email was forwarded to the Chairman of the Allotment Holders Association on 07 October 2020 when the correct email address was received for him from the Council. This email was also sent to dispel any rumours that the Applicant was seeking to install the Onshore Cable Route under the Allotments by any process other than HDD following social media posts by a senior representative of PCC that the allotment land would be affected, with those comments made following the provision of the further clarification by the Applicant to PCC that the allotment plots would not be affected as the installation method is via HDD and the incorrect identification of access rights over Plot 10-13 was to be corrected. It was unfortunate such comments were made by senior representatives of PCC, which appear to have created unnecessary anxiety in relation to the Proposed Development amongst allotment tenants holders and other residents of Portsmouth.

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		It is not considered that the tenants of the Allotments, who have a tenancy of Allotment Gardens, have an interest in the subsoil to the Allotments. Furthermore, It is understood that the Allotment Tenants have tenancies of the individual allotment gardens, but that they do not have a tenancy of the access roads which are located within the allotments. This explains why the individual allotments are not referred to in the Book of Reference, as no rights over the Allotment plots in relation to which they hold a tenancy are sought (as evidenced by their non-inclusion in the Book of Reference which in turn means Article 23 would not authorise acquisition of the land in which they have an interest, noting this authorises the acquisition of rights over "over so much of the Order land described in the book of reference").
3.6.13 - 14	PCC has no alternative allotment sites and waiting lists at all sites with nearly 4 years at the Milton site. Consider the ES makes no assessment of this potential impact and no mitigation measures or controls on these powers. 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.	As installation is to be via HDD under the allotments as confirmed in the Framework Management Plan for Recreational Impacts (REP1-144), and confirmed in para 6.2.9.1 of the Onshore Outline CEMP (REP1-087) and secured by requirement 15 of the DCO (REP1-021), no allotment plots will be affected and no mitigations are required in relation to the non-occurrence of effects.
3.7	**Milton Locks Nature Reserve**	
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 .	As per the response to 3.6.13-14, HDD in this location is confirmed in para 6.2.9.1 of the Onshore Outline CEMP (REP1-087), and secured by requirement 15 of the DCO (REP1-021), and Milton Lock Nature Reserve will not be impacted.. No mitigations are required in relation to the non-occurrence of effects. For the reasons set out at the responses to 3.2.3, the statement made regarding the ability for there to be a variation to this method and for the acquisition of rights in relation to such variation to be authorised by the DCO are wholly incorrect.
3.8	**University of Portsmouth Sports Ground at Furze Lane/Orchard Lane/Langstone Student Village**	
3.8.1 - 2	Advise the current order limits provide for two either/or route options via Furze Lane or through the playing fields east of the student village. Note the AQUIND presentation 28th September 2020 advising Furze Lane has been removed from the Order limits. Notwithstanding PCC flag the disruption to bus route and trees if the Furze Lane option was retained.	The Applicant confirms that the Furze Lane option has been removed from the Order Limits (see Land Plans – REP1-011a), with the retained route to the east of the student village along the playing fields. Any potential impact on the Furze Lane trees, and the bus gate are removed.
3.8.3	Identify the eastern route option will have temporary impacts on the University of Portsmouth Playing Fields and Langstone Sports Site, if the is pursued, will result in temporary loss of the football pitch (8 week period, with an additional period of 8-10 weeks for re-turfing) and southern rugby pitch (8 week period, with an additional period of 8-10 weeks for re-turfing). The pitches are the only facility for the University, and are additionally used by other groups outside of the academic year. Raise the requirement for ongoing access/maintenance, impacting the operation of the University and any future development or alterations. Refer to the previously developed land immediately adjacent to the proposed order limits being indicative of future	The impacts on the pitches, including reinstatement, alongside mitigation works are included in section 4.2.3 of the Framework Management Plan for Recreational Impacts (REP1-144). The reference to future development opportunity is noted, however the previously developed land is not impacted by the Proposed Development. Noting the timetable for the new Local Plan and its consultation as described by PCC in para 1.3.4 of its LIR (REP1-173), the Applicant has considered PCC's Site Allocations Document – Consultation Draft (March 2013), identifies the playing fields/pitches as protected areas. More recent information is available within the Housing and Economic Land

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	opportunities with the proposed infrastructure placing a constraint of future planning, design and layout for this area.	Availability Assessment (Feb 2019) which considered the wider Langstone Campus site including the adjoining open space and the St James' Hospital site as a broad location with potential for development. This document clearly also states that "Any proposals will need to account for the presence of Brent Geese and protected playing pitches on part of the site and consider traffic and air quality impacts." As such, the Applicant considers that the area of the proposed Onshore Cable Corridor within the eastern edge of the playing fields are of extremely limited 'built' development potential. The Applicant has separately responded to the written representation of the University of Portsmouth (see document reference 7.9.5 which PCC may wish to refer to for further information).
3.9	**Milton Common and Flood Defences**	
3.9.2	Refer to the two route options across and around Milton Common, and acknowledge that the site is large enough to accommodate the works, whilst still leaving enough space for other users. Advise of the SINC designation, and requirement for works to take account of the nature conservation interest.	The Proposed Development will result in temporary loss of habitat within Milton Common SINC where the cables are installed across it. Habitats will be reinstated on completion of the construction phase. Programming of works and corresponding detailed plans for implementation of ecological mitigation commitments at Milton Common SINC will be included as part of the Biodiversity Management Plan which will be produced in response to Requirement 9 of the DCO (REP1-021) in accordance with the measures provided for in the Outline landscape and Biodiversity Strategy (REP1-034).
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.	The previous land uses are identified in Section 18.5.4 of ES Chapter 18 (Ground Conditions) (APP-133), and Section 3.10, 9.1.3, 9.2 and 10 of Appendix 18.1 (Preliminary Risk Assessment and Generic Quantitative Risk Assessment) of the ES (APP-429). Mitigation measures in relation to exposure to buried materials including landfills are contained in Section 5.5 of the updated Onshore Outline CEMP (REP1-087). The previous ground investigation undertaken in 2018 included 12 exploratory locations within Milton Common. The investigation provided indicative depths of geological units, identifying likely thicknesses of landfill Made Ground. Complimentary laboratory testing was completed to identify and verify geotechnical, geochemical and geo-environmental properties and considerations, including identification of the presence, extent and nature of potential contaminants. The ground investigation information will inform the installation location, solution, mitigations and any required construction procedures to manage and control any potential contaminants. The Applicant is very aware of the potential difficulties of installing the Onshore Cables across Milton Common. It is for this reason that options are retained for the location of the Onshore Cables in this location, further explained in the Position Statement in relation to the refinement of the Order Limits (REP1-133) and the response to ExA WQ CA1.3.18 (REP1-091)

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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.	Detailed consultation has been undertaken with the Eastern Solent Coastal Partnership (ESCP) who have shared plans of their existing and proposed development, and methodologies for areas where the flood defence works and the Proposed Development overlap have been identified and agreed in principle. Specific measures, with regard to the proposed works and operation form part of the SoCG with PCC (including ESCP) submitted at Deadline 1 (REP1-117) and the Applicant will continue to work with ESCP to agree upon these principles. These in-principle agreements with ESCP will subsequently be used as the general basis for relevant Flood Risk Activity Permit (FRAP) applications with the Environment Agency with regard to works adjacent to the coastal flood defences. The Applicant and Environment Agency are in agreement on the general principles to be adopted to ensure there is no impediment to a permit/exemption being provided to enable construction of the Proposed Development as set out in the Applicant's SoCG with the Environment Agency submitted at Deadline 1 (REP1-108). All works associated with the flood defences will be subject to approval or exemption of environmental permits, and require the Proposed Development to ensure the integrity of the flood defences are not negatively impacted as per section 5.7 of the Onshore Outline CEMP (REP1-087).
3.9.5	There is a third route option noted on the Land Plans (EN020022-2.2-LPSheet9) 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.	Highway impacts are assessed within ES Chapter 22 Traffic and Transport (APP-137) and ES Addendum, and further considered in the Supplementary Transport Assessment (REP1-142), which at section 5.4 includes an Assessment of Eastern Road. The traffic management measures required to facilitate construction of the Onshore Route in this section are provided at section 10 of the Framework Traffic Management Strategy (REP1-068). Further information regarding the approach to selecting the option to install the onshore cables in the vicinity of Milton Common is provided in the Position Statement in relation to the refinement of the Order Limits (REP1-133) and the response to ExA WQ CA1.3.18 (REP1-091).
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.	The programme mitigations applicable to the installation of the Onshore Cable Route in public highway is included in the Framework Traffic Management Strategy (REP1-068). This includes in relation to works on Eastern Road. The Applicant refers to its response to ExA WQ CA1.3.25 ((REP1-091) which provides an explanation of why a period of 5 years within which to implement the Proposed Development and 7 years to exercise compulsory acquisition powers is sought. The Applicant's response to 3.2.3 above is also relevant in this regard, confirming that the area over which rights are to be acquired will not be confirmed until the relevant part of the Onshore Cables has been installed/the detailed design has been approved.
3.10	**Kendall Stadium Sports Ground (Baffins FC)**	

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3.10.1 - 2	PCC confirm they are landlord of Kendall's Stadium, leased to Baffins Milton Rovers Football Club (also consulted). Advise of the updated Order limits tabled by the Applicant on 28th September 2020 and advise PCC will respond as an Affected Person when the changes are consulted on (noting the opinions expressed may be subject change).	The Applicant notes the comment and further comments regarding the Order Limit change will be considered when available. The Applicant refers PCC to the Position Statement in relation to the refinement of the Order Limits (REP1-133) which explains the rationale and benefits of the change sought to the Order limits in this location.
3.10.3 - 4	Advise on the need for appropriate reinstatement requirements alongside clear commitments as to timing of works, indemnity provisions, and future monitoring and maintenance works secured through the New Connection Rights. PCC seek agreement to these obligations in a land agreement between the Applicant, the Council and Baffins FC, however if not achieved, to be secured through requirements imposed upon the DCO.	Section 4.2.2 of Appendix 13 to the ES Addendum (Framework Management Plan for Recreational Impacts) (REP1-144) provides the timing of works, mitigation and management proposed at Baffin Milton Rovers. The Applicant confirms it is willing for reinstatement matters to be addressed in any land agreement agreed with PCC, and with Baffins Milton Rovers FC, in relation to the installation, operation and maintenance of the Onshore Cables in this location. The Applicant also confirms it will discuss further any particular requirement that is considered to be necessary in relation to this particular reinstatement. Section 6.9.4 of the OOCEMP (REP1-087) provides further detail on the reinstatement of sports pitches. Opportunities to minimise impacts on sports pitches will be required to be discussed with relevant stakeholders. This includes ongoing discussions with the Chairman of the Baffins Milton Rovers Football Club on timing of construction and reinstatement requirements within this section. It also includes discussion with PCC to minimise impacts to pitches at Farlington Fields and Langstone Harbour Sports Ground.
3.11	**Kendall's Wharf**	
3.11.2	Specify the importance that there works meet land at Kendall's Wharf, it is important that the work does not interfere or compromise the existing sea defences. Note the route of the cable is due to extend beneath the ESCP construction compound at Kendall's Wharf, anticipated to be complete in December 2023, and the Proposed Development should not result in interruption to the use. Also raise part of the compound is also in use for parking by Aggregate Industries.	Section 20.9 of ES Chapter 20 Surface Water Resources and Flood Risk (APP -135) details construction principles and the requirement to obtain relevant consents and permits for works within the isolated flood risk areas throughout the Cable Corridor which is included at section 5.7 of the original Onshore Outline Construction Environmental Management Plan (CEMP) (APP -505) and retained in the updated Onshore Outline CEMP, notably: "Appointed Contractor (and any sub-contractors) will need to ensure any works over, under or directly adjacent to watercourses/watercourse structures (culvert/sewer) and flood defences are subject to approval or exemption of environmental permits (flood risk activities permit/ordinary watercourse consent), where the contractor will need to develop appropriate design and construction methodologies to ensure that flood risk is not increased, the integrity of these features are not negatively impacted, flow conveyance is not impacted and there is suitable pollution prevention measures in place during the Construction and Operational Stages." This secures the relevant measures for works adjacent to flood defences, in addition to the Applicant being subject to all relevant legal requirements in this regard.

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		The Applicant has liaised with ESCP regarding their planned works, including the opportunity, where practicable, of using the construction compounds after ESCP have completed their development, reducing impacts relating to site set-up and reinstatement (including landscaping). The Applicant has agreed principles with ESCP (in a meeting on 15 May 2019) to safeguard the existing and proposed sea defences and is comfortable that there is an adequate level of flexibility within the Order Limits to implement the Proposed Development alongside the approved ESCP works, including the approved highway realignments. The Applicant is committed to continue to work with ESCP to ensure that the detailed design maintains this position. A Communications Strategy has been developed and incorporated into the updated OOCEMP (REP1-087) which will require consultation between the Applicant and ESCP to avoid conflicts where possible. The Applicant also continues to engage with Aggregate Industries in relation to the rights required, both in respect of the HDD under their freehold and the use of the yard or a construction compound during HDD installation works.
3.11.3	PCC then refer to the cable route south of Kendall's Wharf into Baffin and Milton Rovers FC football ground, and the southern football field/cricket pitch on PCC land. Advise that trenching dependent upon timing, may affect the ability to use the grounds for playing of sport and suggest no proposals from AQUIND have been provided to mitigate the loss of open space or mitigate the displacement of users of the land.	Section 4.2.2 of Appendix 13 to the ES Addendum (Framework Management Plan for Recreational Impacts) (REP1-144) provides a review of the impacts and potential mitigation for the football field and cricket pitch. The Order limits in this location have been revised, as shown on the Land Plans (REP1-011a) and detailed in the Position Statement in relation to the refinement of the Order Limits (REP1-133). This removes the potential for a trenching across the southern part of the cricket pitch and the west side northern part of the southern football pitch. Trenching will be limited to the western side of both pitches.
3.11.4	Comment on the compound along a vehicular access route to both the Tudor Sailing Club and Andrew Simpson Watersports Centre (ASWC), which is used by the ESCP contractor, which is anticipated to be required until the end of 2022. Also advise access will need to be maintained for the Sailing Club and ASWC.	The Applicant notes PCC's comment regarding Tudor Sailing Club and Andrew Simpson Watersports Centre. Section 5.23 of the 'Onshore Cable Route Construction Impacts on Access to Properties and Car Parking and Communication Strategy' which is included in Appendix 1 of the Framework Traffic Management Strategy (FTMS) (REP1-068) will be updated to address measures in relation to access to the Tudor Sailing Club. Please see response to 3.11.2 regarding ESCP works.
3.11.5	Regarding the boat compound leased to Tudor Sailing Club, identified for car parking in connection with the Proposed Development, PCC advise there is no obvious alternative for boat storage. PCC advise they need to be included within this discussions as freeholder.	The Applicant removed the cable route option via the Tudor Sailing Club boatyard at Deadline 1 but retained an area of land within the boat yard over which it is seeking to agree rights of temporary use with Tudor Sailing Club. The Applicant has had a meeting with representatives of the Sailing Club to inform them of the changes made at Deadline 1 and the retention of the area over which rights for temporary use are sought and will continue to engage with the Sailing Club to agree the rights required by agreement.

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3.11.6	Langstone Harbour playing fields car park is rented to Audi for parking during office hours with an immediately adjacent area used ESCP as a materials storage compound. Access must be maintained during construction of the Proposed Development.	The Applicant notes PCC's comment regarding Langstone Harbour playing fields car park. Section 5.23 of the 'Onshore Cable Route Construction Impacts on Access to Properties and Car Parking and Communication Strategy' which is included in Appendix 1 of the Framework Traffic Management Strategy (FTMS) (REP1-068) will be updated to address measures in relation to access to the Langstone Harbour playing fields car park. The Applicant also continues to engage with Audi in relation to their use of the area in question.
3.11.7	At Great Salterns Quay the order limits extend to include the Harvester Inn car park, let by way of a long lease to Butlers & Mitchell. Advise PCC retains the freehold to the property and will need to be party to any agreement.	This is noted and the Applicant was already aware. Further discussions have taken place with the Council's tenant, Mitchells and Butlers, and it is anticipated the rights required by the Applicant can be agreed voluntarily. Following appointment by PCC of a land agent in September 2020 it is hoped it will not be possible to progress negotiations with PCC and their tenant.
3.11.8	Further south PCC note the cable is very closely aligned to the sea defence wall works scheduled for 2022-23 and advise works should neither impede the construction of nor compromise the completed sea defences. In addition Salterns Quay car park (within the order limits) has been identified for use as a compound by the contractor for the sea defence scheme from 2022 and use and access must not be compromised during construction.	See the response to para 3.11.2 which confirms engagement to date and forward engagement proposed within the Communications Strategy incorporated into the updated OOCEMP (REP1-087). This will require consultation between the Applicant and ESCP to seek to avoid conflicts where possible.
3.11.9	The proposed cable route and construction works are similar to those of the construction of the sea defences for Portsmouth and consider it extremely important that the Proposed Development does not compromise nor impede the sea defence scheme. Additional concern that construction will disrupt the peaceful enjoyment and use of properties let by the Council, including potentially disrupting income.	See the response to para 3.11.2 which confirms the construction principles for working in proximity to the existing and proposed flood defences, and the associated communications strategy. The Applicant is engaged with a number of the Council's tenants where it has been identified that rights to support the construction of the Proposed Development are necessary. The Applicant will continue to engage with the Council and their tenants to agree the rights required by agreement, minimising impacts on the Council's tenants wherever possible.
3.12	**Farlington Playing Fields**	
3.12.1 – 4. 7 & 9, 10	Regarding use PCC advise: Direct impact on 8 senior pitches the 9v9 and 1 cricket the car park and access road with over 56 different teams use the football pitches (average 238 senior football matches season) with Sunday morning hosting of 10 or 11 matches, with some games on Sunday afternoons and occasional mid-week games. Cricket matches are played at weekends as well as mid-week (average 39 cricket matches season) Raise the loss of available facilities and income. Advise this would be multiplied year on year for the duration of the works up to 7 years. Advise no mitigation as to how sports fixtures will be accommodated has been provided, including for an unspecified area of the car park. PCC assume this would make the majority of the whole field depending on car park and access availability	Section 4.2.1 of the Framework Management Plan for Recreational Impacts (REP1-144) covers Farlington Playing Fields. The Plan advises on the timescales of the impacts on specific pitches, and provides mitigation including an indicative construction layout incorporating relocated pitches. Farlington Playing Fields may be affected for up to 52 weeks, with an additional period of 8-10 weeks for reinstatement.. Whilst the Applicant will have 7 years to exercise the CPO powers, it is not the case that the works will be ongoing for 7 years. This would be impossible taking into account the winter working mitigations included in relation to Brent Geese. The Applicant will discuss this further with PCC. The works will be programmed and the programme of works will be communicated to PCC as outlined in section 4.4.3.4 – 4.4.3.9 of the OOCEMP (REP1-087).]

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	unusable for up to 2 years plus reinstatement times of 6 to 12 months, but construction related limitations would be in place on land within the Order limits for 7 years.	
3.12.5	Advise of use of Farlington Playing Fields to host camping for the Victorious music festival August each year, where the whole field is used for camping. No other site offers the space or infrastructure required, and its loss would result in significant financial loss to PCC and possibly effect the whole Victorious festival for a period of up to 7 years.	The Framework Management Plan for Recreational Impacts (REP1-144) advises that in respect of events, the contractor will review the construction programme to minimise disruption at key events, including the Victorious Festival. Particularly, refer to Appendix A for an indicative phasing of works at Farlington Playing fields which takes into account Victorious Music Festival by either considerably reducing the areas taken up by temporary works or having no works during that period.
3.12.6	Refer to Table 3.9 of ES Chapter 3 Description of the Proposed Development that identifies construction works on site for around 52 to 58 weeks between Q3 2021 and Q2 2024, but provides no detail of re-instatement between works or whether reinstatement will be carried out on completion of all works.	The Applicant notes that Table 3.9 provides an overarching indicative onshore construction programme, with the programme between Q3 2021 and Q1 2024 being for the Converter Station Construction. The Applicant confirms the duration of construction works at Farlington Playing Fields to be 52 weeks, with an additional period of 8-10 weeks for reinstatement. This is confirmed in section 4.2.1 of the Framework Management Plan for Recreational Impacts (REP1-144).
3.12.8	Advise of the integrated land drainage system at Farlington Playing Fields and any damage (through excavation or heavy vehicle movements) may impact the integrity of the whole system, with associated delay on any reinstatement.	Section 6.9.3 of the updated Onshore Outline CEMP (REP1-087) provides for a land drainage survey at pre-construction stage, with associated reinstatement, and post-construction survey to ensure the integrity of the existing land drainage system. The Onshore Outline CEMP is secured by requirement 15 of the DCO (REP1-021).
3.12.11	In addition Farlington sports field is an identified site for overwintering birds and works may have significant impacts with no assessment or mitigation that for example grass cover would be intact for the winter months.	The Applicant is aware that Farlington Playing Fields are noted as being a Solent Waders and Brent Goose Strategy (SWBGS) Site which is functionally linked to the adjacent Special Protection Areas of Chichester and Langstone Harbours and Portsmouth Harbour. The SWBGS sites has been assessed accordingly in both Chapter 16 of the ES and the updated HRA Report (REP1-081). The assessment is informed by a commitment to restore all grassland SWBGS before the start of the non-breeding period in October where possible. For Farlington Playing Fields the HRA Report outlines a programme of restoration into the month of October. This is concluded not to represent an adverse effect on the integrity of the SPA network, a conclusion which has been agreed with Natural England.
3.13	**Impact on Zetland Field**	
3.13.1 - 2	Consider disruption to this park would have a detrimental localised effect on the residents as the next nearest park /open space is nearly ¾ mile away across the A2030 Eastern Road.	Section 4.2.6 of the Framework Management Plan for Recreational Impacts (REP1-144) covers Zetland Field. The Plan demonstrates ways in which mitigation can be applied. In the case of Zetland Field, the works could be undertaken in 1-2 weeks, either in one working area across the field or across two working areas divided into the northern half and the southern half. Access to the field would be maintained. A period of 8 weeks would still be allowed for reinstatement of turf. To minimise recreational disturbance further, it is anticipated that the single set of goalposts located within the

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		Order Limits at the northern end of the fields could be moved to the eastern side of the field to ensure they remain available for use during construction works. The Applicant would welcome comments from PCC on mitigation for Zetland Field..
4.0 Environmrntal and Planning Impacts		
4.1	**Impact on Ecology**	
A	**Trees**	
4.1.1 - 3	Refers to the rights sought for works to trees, that the loss of trees is of concern to PCC and its residents, (in particular mature trees).	The Applicant will seek to avoid all impacts on trees where possible as identified in paragraph 6.3.2.1 of the updated Onshore Outline CEMP (REP1-087). Where this is not possible, all pruning and felling works will be specified by a suitably trained and experienced Arboriculture consultant and will be carried out by a suitably trained and experienced arboriculture contractor, in accordance with the updated OLBS (REP1-034) at Section 1.3.4, secured by requirement 7 of the dDCO (APP-019). In respect of replacement replanting, the Applicant refers to response to ExA WQ 1 MG1.1.17 (REP1-091) provided at Deadline 1. In particular, the Applicant refers to the updated Outline Landscape and Biodiversity Strategy (REP1-034) and the mitigation measures associated with the Onshore Cable Corridor in Section 1.5.
B	**Over Wintering Birds**	
4.1.4	Langstone and Farlington are sites designated as overwintering bird grassing sites for Brent Geese, PCC are concerned that following cable laying operations there may not be sufficient grass coverage intact and ready for the winter season, detrimentally affecting overwintering birds.	The Applicant has provided additional details in the updated HRA Report (REP1-081) and Chapter 10 of the ES Addendum on the potential impacts on European sites and associated functionally linked land. This specifically covers grassland restoration at Solent Waders and Brent Goose Strategy (SWBGS) sites. All SWBGS grassland will be restored to appropriate condition before the onset of the non-breeding period in October. The exception is Farlington Playing Fields which will be restored during the month of October. The restoration area at this SWBGS is of 1.7 ha which represents 12% of the site and just 0.2% of the SWBGS network. Restoration will take place over a short period of the non-breeding season and during a month when the majority of dark-bellied brent geese (which feed on the grass) have not yet returned to the Solent. On this basis, it is concluded that there would be no adverse effects on site integrity of Chichester and Langstone Harbours SPA and the functionally linked SWBGS sites.
C	**Reinstatement**	
4.1.5 - 6	Note the Applicants information on re-instatement of the cable route, but no detail on other areas for construction (tracks and material storage), and raise concern about the	The Applicant refers to its response to Written Question ExQ1 SE1.15.9 (REP1-091) regarding the reinstatement of open spaces as secured by the Outline Landscape and Biodiversity Strategy (REP1-034), and Onshore Outline Construction Environmental

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	effect of these operations on ground compaction, soil structure, and drainage at Farlington. PCC will raise with the ExA the need for an independent inspector (for example from the Institute of Groundsmanship) to be agreed by both parties to assess/confirm reinstatement works, to be funded by the Applicant.	Management Plan (CEMP) (REP1-087) secured by Requirements 9 and 15 of the DCO (APP-019) respectively. Regarding the drainage of Farlington Playing Fields, the Applicant refers to its response to Written Question ExQ1 OW1.12.12 and 3.12.8 above. The Applicant has confirmed its willingness to enter into a PPA to cover required resource costs for post-consent approvals and monitoring. The Applicant looks forward to PCC engaging on these matters.
D	**SINC sites (Sites of Importance for Nature Conservation)**	
4.1.7 - 8	Any works carried on within designated SINCs must have regard to protecting their biodiversity and community value, specific reference to Milton Common and Fort Cumberland Open Space.	The Applicant has undertaken assessments of potential impacts on SINCS as detailed in ES Chapter 16 (APP-131) and updated in Chapter 10 of the ES Addendum (REP1-139). This includes Milton Common SINC, which is assessed in Sections 16.6.2.27 and 16.6.2.28 of the ES. Mitigation to protect biodiversity supported by Milton Common SINC is included within Section 16.8 of the ES. Works at Fort Cumberland will be limited to the informal car park, which is situated outside the SINC, and which is not open space in accordance with the relevant statutory definition of the same.
4.1.10	Comment on the adherence to all relevant legislation e.g. Conservation of Habitats and Species Regulations 2017, Wildlife and Countryside Act 1981 (as amended). Note 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 as indicative of a failure to adhere.	The legislative and planning policy framework applied to the assessment of ecology is provided in section 16.2 of ES Chapter 16 (APP-131). The Applicant has submitted a Habitats Regulations Assessment (REP1-081) in relation to the Proposed Development. No other relevant legislation is disapplied, and therefore the law is applicable.
4.2	**Air Quality**	
4.2.1	Refer to ClientEarths successful challenge the Government's national Air Quality Policy, which has resulted in PCC being issued with four Ministerial Directions in respect of air quality, placing a legally binding duty on the Council to undertake a number of steps to improve air quality in the city to within the legal limits.	With reference to Chapter 23 of the ES (REP1-033), paragraph 23.5.1.6, it is noted that PCC is expected to deliver a modelling report to Defra at the end of November 2020 which will determine the specific conditions of the Clean Air Zone (CAZ) mandated under the Ministerial Direction for its failure to comply. Therefore, it has not been possible to incorporate information relating to the impact of the CAZ on traffic flows and air quality into the assessment. As described in paragraph 23.5.7 of the ES (APP-138), a CAZ is one of a number of measures identified in the Outline Business Case for air quality action which, in combination, will be sufficient to bring air quality in compliance with Directive 2008/50/EC in the shortest time possible. Construction of the Proposed Development will meet all requirements mandated by the CAZ with respect to vehicles and plant.
4.2.2	PCC provided a map of areas currently in exceedance, and near exceedance of the legal limit for annual average concentrations of nitrogen dioxide. Advise that emissions	New exceedances of the EU Limit Values will not be produced in either the construction or operational stages as a result of the Proposed Development. All

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	from road traffic are the major contributor to the levels of nitrogen dioxide recorded and therefore very sensitive to increases in traffic volumes or queuing traffic.	exceedances predicted are already present in the Do-Minimum scenarios as shown in Figure 23.18 to Figure 23.20 (REP1-055 to REP1-057). The Proposed Development has been subject to a rigorous air quality impact assessment in accordance with PCCs SPD incorporating predicted traffic flows from the SRTM and congestion resulting from the construction phase of the Proposed Development. A worst-case approach was taken using peak-flows from 2026 and background and emissions from 2022. The effects associated with construction, which will be transient and temporary, will be mitigated by measures contained within the CTMP (REP1-070).
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 exceedance locations, which again are sensitive to increases in traffic volumes and queuing.	Appendix 23.8 of the ES (REP1-078) provides a full description of the impacts of the Proposed Development in the Eastern Road area in which the impact of lane closures to facilitate installation of the cable route on Tangier Road / Eastern Road and resultant traffic redistribution is considered to be slight adverse and the effect not significant. This incorporates the anticipated increase in queueing. Although the results are predicted to be worse during cabling, it should be noted that the maximum prediction in AQMA No.9 is over 8 µg/m³ under the objective and exceedances of the health-based objective are unlikely. These effects, which will be transient and temporary, will be mitigated by measures contained within Section 2.5 of the FTMS (REP1-068) to ensure the continued flow of traffic and minimising of queues. The impacts of lane closures on the Eastern Road have been assessed within the Transport Assessment (APP-448) and Supplementary Transport Assessment (REP1-142). All impacts associated with the construction of the Onshore Cable Route on Eastern Road will be temporary in nature. The outputs from traffic modelling reported in the Transport Assessment (APP-448) and Supplementary Transport Assessment (REP1-142) have been used as inputs to the diverted traffic and construction traffic air quality models as described in Chapter 23 of the ES (REP1-033) to illustrate the temporary air quality effects resulting from the construction phase of the proposed development. There are no permanent traffic impacts resulting from the proposed development.
4.2.4	Advise mitigation measures included in the Operation Management Plan and ES Air Quality chapter are considered sufficient to reduce some of the air quality impacts of the construction works, but note uncertainty in the modelling. To that end PCC consider "it cannot be determined with certainty that an exceedance of the NO2 annual mean objective will not occur as a result of diverted traffic."	All model predictions are subject to uncertainties which are mitigated through the application of conservative assumptions as described ES Chapter 23 ES (REP1-033) paragraph 23.4.8.1. The judgements of significance summarised in Table 23.116 take into consideration this conservatism and the model results to provide the best possible representation of future air quality impacts. Where necessary, the mitigation of emissions from diverted traffic will be undertaken through measures set out within the Detailed CTMP documents. As outlined in Chapter 23 of the ES (REP1-033), with the uncertainty in the modelling considered the NO2 objective is highly likely to be exceeded under the Do-Minimum scenario, and this is predicted to be unchanged under the two temporary diverted traffic scenarios modelled. Construction dust will be managed in accordance with the mitigation in the Onshore Outline CEMP Rev 002 (REP1-087).

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		There are no operation phase traffic impacts, and the impacts from the operation of backup generators are assessed as negligible.
4.2.5	The Government requires 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. 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. PCC cannot support proposals which risk achievement of this legal objective.	As described in paragraph 23.5.7 of the ES (REP1-033), the CAZ is one of a number of measures identified in the Outline Business Case for air quality action which, in combination, will be sufficient to bring air quality in compliance with Directive 2008/50/EC in the shortest time possible. The project will adhere to all requirements mandated in the Ministerial Direction to ensure emissions are minimised and as construction traffic operation is expected to be transitory and temporary in nature, is not expected to impact on national obligations under the Directive.
4.3	**Impact of Noise (During Construction)**	
4.3.1	It is the Council's view based upon considering the ES Chapter 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.	As indicated in Paragraph 6.2.8.17 of the Onshore Outline CEMP Rev 002 (REP1-087), once a contractor is appointed and detailed works plans are produced, the contractor will engage with local residents affected by the works and the environmental health department at the local planning authorities to agree additional mitigation to reduce the significant effects as far as reasonably practicable. This could include temporary noise monitoring at locations where construction noise is expected to occur at individual receptors for longer periods (E.g. HDD- compounds), but this is not considered necessary or appropriate for short-term transitory temporary cable and duct installation works.
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. The areas identified in the ES noise report are: <u>(1) Section 5 - Havant Road between Farlington Ave and Eastern Rd.</u> 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.	There are three potential options for the timings works outside of core working hours on Havant Road, as explained in point 2 of paragraph 24.4.2.17 of the ES (APP-139), one of which involves night-time working. The predicted impacts for each option are presented at paragraphs 24.6.6.11 to 24.6.6.15 of the ES (APP-139), and paragraphs 17.3.2.43 to 17.3.2.44 of the ES Addendum (REP1-139). Paragraph 24.6.6.13 of the ES explains that breaking, cutting and resurfacing equipment has not been included in calculations of the night-time noise effects because, as a key mitigation measure (see paragraph 6.2.8.10 of the Onshore Outline CEMP Rev 002 (REP1-087)), equipment associated with these activities will not be permitted during the night-time period.
	<u>(2) Section 6 - Fitzherbert road and Sainsburys car park</u> 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.	The predicted effects of the works outside of core working hours at Fitzherbert Road and Sainsbury's car park are presented at paragraphs 24.6.7.8 to 24.6.7.13 of the ES (APP-139) and paragraph 17.3.2.45 of the ES Addendum (REP1-139). The point regarding the exclusion of road breaking/ cutting and resurfacing equipment has been explained above.

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	(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.	The predicted effects for the works outside of core working hours in section 8 are contained in paragraphs 24.6.9.7 to 24.6.9.28 of the ES (APP-139) and supplemented by Paragraphs 17.3.2.46 to 17.3.2.71 of the ES Addendum (REP1-139). It is acknowledged that the Harbourside Caravan Park comprises multiple sensitive receptors. The reason for describing it as one receptor is because the nature of the noise and vibration effects, and the appropriate mitigation measures, are expected to be the same at all of the caravans located closest to the works (i.e. those closest to Eastern Road). British Standard 5228-1:2009+A1:2014 *Code of practice for noise and vibration control on construction and open sites* states that noise levels above certain trigger levels (equivalent to a large adverse magnitude of level in this assessment) would have to occur for a period of ten or more days of working in any 15 consecutive days or a total of 40 days in any consecutive 6 months for noise insulation or temporary rehousing to be considered necessary. BS 5228 states that eligibility for noise insulation or temporary re-housing, as forms of mitigation, needs to be confirmed later in the process when a contractor is appointed and detailed method statements and programme information are available. However based on the information available at this stage of the project, these thresholds of duration are not expected to be exceeded. Furthermore BS 5228 states that eligibility for noise insulation or temporary rehousing is applicable 'at property lawfully occupied as a permanent dwelling', and therefore in the case of Harbourside Caravan Park this eligibility is not considered to apply.
	(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	Noted. Please see row above for details of predicted impacts of the works outside of core working hours in section 8.
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.	Noted. Please see answer to 4.3.2 for direction to details of predicted impacts of the works outside of core working hours in section 8.
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.	The noise and vibration assessment has included breaking, cutting and resurfacing equipment in areas where the cable circuits will be installed within roads or footpaths. Breaking, cutting and resurfacing equipment has not been included in locations where the cable circuits are installed over agricultural land or open ground because this equipment will not be used in these areas. Breaking, cutting and resurfacing equipment has not been included in calculations of any night-time noise effects because, as a mitigation measure (see paragraph 6.2.8.10 of the Onshore Outline CEMP Rev 002 (REP1-087)), equipment associated with these activities will not be permitted during the night-time period.

<table>
<tr><th>Para No.</th><th>Local Impact Report Statement</th><th>Applicant’s Response</th></tr>
<tr><td></td><td></td><td>No further noise assessment to that contained in Chapter 24 of the ES and Chapter 17 of the ES Addendum is considered necessary because the assessment utilises all information available and is robust and sufficient to identify the likely significant noise and vibration impacts on sensitive receptors.</td></tr>
<tr><td>4.3.5</td><td>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.</td><td>The noise and vibration mitigation measures that are applicable at all stages of construction, at all times, are contained in section 5.12 of the Onshore Outline CEMP Rev 002 (REP1-087). The noise mitigation measures relevant to works outside of core working hours are contained in section 6.2.8 of the updated Onshore Outline CEMP (REP1-087), which includes noise screening and avoiding breaking, cutting and resurfacing activities during night-time hours. The contractor will be required to comply with all requirements contained in Onshore Outline CEMP, and therefore it is not the case that mitigation measures are being left ‘wholly to the contractor’.</td></tr>
<tr><td>4.3.6</td><td>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?</td><td>The construction working hours are controlled by Requirement 18 of the draft DCO Rev 002 (REP1-021). Works required to take place outside of the core working hours will be expressly stated in the CEMP, and as stated in Requirement 15 of the draft DCO, the CEMP is subject to approval by the local planning authority. These controls ensure that noisy works will not be completed outside of the agreed working hours.</td></tr>
<tr><td>4.4</td><td colspan="2">Impacts on the Amenities of Local Residents in Close Proximity to the Proposed Route</td></tr>
<tr><td>4.4.1 - 2</td><td>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.

From north to south: https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-001707-Portsmouth%20City%20Council%20-%20APPENDIX%20B%20-%20Task%20B%20-%20Local%20Impact%20Report%20Master%20Final.pdf</td><td>Construction impacts are by their nature, temporary effects, and therefore any impact on amenity will be temporary. This is particularly the case given the linear nature of the Onshore Cable Corridor, which means that the duration of noise and vibration effects, and the consequential impact on amenity, will be transitory and short-term. The mitigation measures specified in sections 5.12 and 6.2.8 of the OOCEMP Rev 002 (REP1-087) will ensure that noise and vibration effects are minimised as far as reasonably practicable, in the context of balancing other environmental impacts such as road traffic.

In all cases access to residential properties will be maintained at all time for pedestrians and cyclists. Some restrictions to vehicular access may be required in some locations, the management of which is detailed in Appendix 1 of the Framework Traffic Management Strategy (REP1-068)

<table>
<tr><th>Street name identified by PCC (Land Plan)</th><th>AQUIND Comment</th></tr>
<tr><td>Farlington Avenue (6)</td><td>Works will take place during Core Working Hours.

Farlington Avenue is assessed as a High impact risk area for dust and</td></tr>
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			commensurate mitigation measures are provided in Table 5.1 of the OOCEMP (REP1-087).
		Evelegh Road (6)	Works will take place during Core Working Hours and only during school holiday periods. Evelegh Road is assessed as a High impact risk area for dust and commensurate mitigation measures are provide in Table 5.1 of the OOCEMP (REP1-087).
		Havant Road (6)	Works outside of Core Working Hours for up to four weekends may be required to facilitate a road closure at the point where the cable route crosses the carriageway. The specific noise mitigation measures are contained in section 6.2.8 of the OOCEMP (REP1-087), which include noise screening and avoiding road breaking, cutting or resurfacing at night. Havant Road is assessed as a High impact risk area for dust and commensurate mitigation measures are provide in Table 5.1 of the OOCEMP(REP1-087).
		Eastern Road (7)	Works will take place during Core Working Hours. Eastern Road is assessed as a High impact risk area for dust and commensurate mitigation measures are provide in Table 5.1 of the OOCEMP (REP1-087).
		Harbourside Park (8)	Works outside of Core Working Hours for up to 8-9 days per circuit may be required to mitigate traffic impacts. The specific noise mitigation measures are contained in section 6.2.8 of the OOCEMP (REP1-087), which include noise screening and avoiding road breaking, cutting or resurfacing at night.

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			Harbourside Park is assessed as a High impact risk area for dust and commensurate mitigation measures are provide in Table 5.1 of the OOCEMP (REP1-087).
		Eastern Road (9)	Works outside of Core Working Hours may be required to mitigate traffic impacts. Works will preferentially take place in the open ground adjacent to the south of Eastern Road, thereby avoiding road breaking and maximising distance to sensitive receptors. Mitigation measures specified for the Harbourside Caravan Park above would also be applicable here. This section Eastern Road is assessed as a High impact risk area for dust and commensurate mitigation measures are provide in Table 5.1 of the OOCEMP (REP1-087).
		Eastern Avenue (9)	Works will take place during Core Working Hours. This section Eastern Avenue is assessed as a High impact risk area for dust and commensurate mitigation measures are provide in Table 5.1 of the OOCEMP (REP1-087).
		Moorings Way (9)	Works will take place during Core Working Hours. Works will preferentially take place in the open ground adjacent to the north of Moorings Way, thereby avoiding road breaking and maximising distance to sensitive receptors. Moorings Way is assessed as a High impact risk area for dust and commensurate mitigation measures are provide in Table 5.1 of the OOCEMP (REP1-087).
		Furze Lane (9)	**now removed
		Furze Lane (10)	**now removed

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		Locksway Road (10)	Works will take place during Core Working Hours. Locksway Road is assessed as a Medium impact risk area for dust and commensurate mitigation measures are provide in Table 5.1 of the OOCEMP (REP1-087).
		Longshore Way (10)	Works will take place during Core Working Hours. Longshore Way is assessed as a Medium impact risk area for dust and commensurate mitigation measures are provide in Table 5.1 of the OOCEMP (REP1-087).
		Kingsley Road (10)	Works will take place during Core Working Hours. Kingsley Road is assessed as a Medium impact risk area for dust and commensurate mitigation measures are provide in Table 5.1 of the OOCEMP (REP1-087).
		Yeo Court (10)	Works will take place during Core Working Hours. Yeo Court is assessed as a Medium impact risk area for dust and commensurate mitigation measures are provide in section Table 5.1 of the OOCEMP (REP1-087).
		Henderson Road (10)	Works will take place during Core Working Hours. Henderson Road is assessed as a Medium impact risk area for dust and commensurate mitigation measures are provide in Table 5.1 of the OOCEMP (REP1-087).
		Fort Cumberland Road (10)	Works will take place during Core Working Hours.

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		Fort Cumberland Road is assessed as a Medium impact risk area for dust and commensurate mitigation measures are provide in Table 5.1 of the OOCEMP (REP1-087).
5.0	**Highways Impact**	
5.1.3 - 4	PCC acknowledge that the proposed order limits for the onshore cable routes has been narrowed since the initial meetings with the Applicant, but consider the limits are still relatively broad and provide little certainty as to the likely final route, to be determined by the contractor once appointed.	The Applicant refers to its response to Written Questions ExQ1 CA1.3.6, CA1.3.20 and CA1.3.30 (REP1-091) regarding the refinement of the Order Limits and limits of deviation, alongside the Position Statement in relation to the refinement of the Order limits (REP1-133). The limited limits of deviation provided for within the Order limits are necessary and proportionate to ensure the Proposed Development may be constructed without impediment with the ability to navigate existing services, thereby avoiding the need for service diversions.
5.1.5	Advise that the locations and number of joint bays are currently unknown, and whilst located preferably in highway verges, fields or car parks the final positions are yet to be determined.	The location of the joint bays will be off the roads, (e.g. in verges, parks) where practicable, with this secured in the updated Onshore Outline CEMP (REP1-087) and secured by requirement 15 of the dDCO (REP1-031). The location of the joint bays cannot be confirmed now as it is a matter to be addressed at detailed design. Detailed design approvals for all works in Portsmouth will be approved by PCC.
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.	The duration of impacts is determined by the installation rate of the Onshore Cable Route based upon professional experience of similar projects. Additional work undertaken post-submission has further tested the 100m per week installation rate which used to calculate duration of impact. The refined installation rate assumptions are set out in paragraph 2.3.1.2 of the FTMS (REP1-068), and account for factors which may impact upon the speed at which ducts can be installed, including land use type and existing level of service congestion. Whilst there are amendments to the assumed rate of installation in certain locations, the overall timescales for the installation of the Onshore Cables remains as set out and assessed in the original ES. Further information in this regard is contained in the ES Addendum (REP1-139). All assessments of impacts are based upon a worst-case installation rate assumptions for robustness. Full utility searches have been conducted within the Order limits to identify existing utilities to the best available level possible without breaking open the surface of the highway (which is not appropriate or necessary at this time), identifying a single utility owner where there is potential for a diversion. All utility plans have been discussed with the relevant owners, with work ongoing with regards to protective provisions. The duration of works set out in the FTMS are realistic and achievable.

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5.1.9 - 10	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 consider a second route which continues along A2030 Eastern Road before cutting through Eastern Avenue and Moorings Way. PCC consider this would be significantly more disruptive to traffic but also to residents 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.	The Applicant notes PCC's comment on the options around Milton Common, and refers to WQ CA1.3.18 (REP1-091) for additional information on the uncertainty of routing through Milton Common and why the final selection cannot be confirmed at this time. The position in relation to the selection of the option across Milton Common is further detailed in the Position Statement in relation to the refinement of the Order Limits (REP1-133), in particular paragraph 4.6. The Applicant has made clear to PCC that should it wish for a single option to be confirmed now this would have to be the route along Eastern Road as the only route option without feasibility concerns at this time. It is not considered this in the interest of either party given the approach to including an option across Milton Common has been to seek to avoid impacts on the Eastern Road in this location. It will be necessary to balance various factors when determining the feasibility of the route across Milton Common, including in relation to technical feasibility, the safety of the installation and the presence of the cable in Milton Common and cost.
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.	A new formal access arrangement required for the ORS buildings to be located in the public car park south of Fort Cumberland Road. This access will be located on the southern side of the ORS compound and directly from the public car park. A new permanent access is not required onto Fort Cumberland Road. This is shown in Section 7.5 of the Design and Access Statement (REP1-031).
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.	Any conflicts would be managed by programme restrictions set out in the Framework Traffic Management Strategy (REP1-068). These restrictions will be secured via the protective provisions for the protection of highways and traffic contained at Part 5 of Schedule 13 to the Development Consent Order (dDCO) (REP1-021). These protective provisions were provided to PCC in July but comments on these are yet to be received. The Applicant looks forward to PCC engaging on these.
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	The Applicant notes the error which was included in Table 18 of the Transport Assessment (TA) (APP- 448) for B2177 Portsdown Hill Road between the junctions with New Down Lane and Dellcrest Path. The following traffic flows supersede those which were included in Table 18 of the TA (APP-448): • AM Peak (08:00 – 09:00):

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	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 .	○ Westbound: 632 vehicles (6.3% HGV) ○ Eastbound: 466 vehicles (6.1% HGV) ○ Two way: 1099 vehicles (6.2% HGV) ○ Average Speed: 38.7 mph • PM Peak (17:00 – 18:00): ○ Westbound: 730 vehicles (5.1% HGV) ○ Eastbound: 769 vehicles (4.8% HGV) ○ Two way: 1499 vehicles (4.9%) ○ Average Speed: 37.2 mph These corrected traffic flows show similar volumes to that shown at Portsdown Hill site 2 within the TA (Table 19), which recorded a two-way flow of 1,098 vehicles in the AM peak and 1,499 vehicles in the PM peak. This shows that the majority of traffic recorded at site 1 also travels through site 2.
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.	The approach which is to be taken when shared-use paths or cycleways are to be affected by construction works is set out in Section 2.9.3 of the Framework Traffic Management Strategy (FTMS) (REP1-068). This approach includes the requirement to provide temporary cycle facilities should existing provisions be disrupted and no suitable diversionary routes be available
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.	The Eastern Road Further Traffic Assessments Technical Note is included in Appendix E of the Supplementary Transport Assessment (REP1-142). It is correct that construction of the Onshore Cable Route on the A2030 Eastern Road south of Tangier Road cannot take place at the same time as construction along other parts of the A2030 Eastern Road. Such simultaneous construction is prohibited by the programme restrictions included within Section 10 of the Framework Traffic Management Strategy (REP1-068).

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	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.	The Applicant confirms that the junctions listed in paragraph 1.10.4.4 of the Transport Assessment (APP-448) include additional junctions to those agreed in the Scoping Note that were assessed on the basis of at least one approach experiencing an increase of 10% or more and that the junction had a Volume to Capacity ratio of over 100% in one or both of the Do Something scenarios. Of the nine junctions, the following five fall within the jurisdiction of PCC: • A3 Southampton Road / A3 London Road / Spur Road / Havant Road roundabout; • Stubbington Avenue / A2047 / Gladys Avenue / Angerstein Road mini-roundabout; • Burrfields Road / Moneyfield Avenue / Dundas Lane roundabout; • A2030 Eastern Road / Tangier Road traffic signal junction; and • A2030 Eastern Road / Hayling Avenue priority junction. The summary of junction capacity assessments showed in Table 162 of the Transport Assessment identifies that the operation of these junctions does not significantly deteriorate with the Do Something Scenarios. Further to this, in response to PCC's Relevant Representation (RR-185), additional assessments of the impact of works on the A2030 Eastern Road between Tangier Road and Eastern Avenue have been completed and are included in the Eastern Road Traffic Assessment Technical Note which is included in Appendix E, and summarised in Section 5.4 of the Supplementary Transport Assessment (REP1-142). The Technical Note assesses the impact that traffic management would have between Tangier Road and Eastern Avenue through supplementary junction capacity assessments of the A2030 Eastern Road / Tangier Road traffic signal junction with single lane closures in place. These assessments showed that the junction is anticipated to operate over capacity in the southbound direction in the PM peak where traffic management is located on the southbound lane and in the northbound direction in the AM peak where traffic management is located on the northbound lane, leading to an increase in queue lengths in comparison with the Do-Minimum scenario. The Applicant notes, however, that the delays experienced in the southbound direction in the PM peak hour, where the junction is predicted to operate over capacity, are not uncommon for PM peak hour conditions along the A2030 Eastern Road. This means that the driver experience is likely to be similar to existing conditions where some degree of congestion is present along much of the A2030 Eastern Road southbound corridor, due to the traffic management replicating and relocating the existing merge from two lanes to one lane.

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		Where the traffic management is installed in the northbound direction, additional queuing at the A2030 Eastern Road / Tangier Road traffic signal junction can be accommodated without having a detrimental impact on the wider highway network because there are no major upstream junctions that would be impacted by this temporary congestion.
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.	Station Road falls within Sections 5 and 6 which cover the Farlington area and show routes which are impacted by traffic redistribution associated with the lane closures modelled at the Farlington Avenue / Havant Road / A2030 Eastern Road traffic signal junction in the SRTM Do-Something scenarios Station Road is a single carriageway residential road with intermittent on-street parking on one side of the carriageway. The traffic flow increase of 217 in the Do-Something scenario equates to an increase in traffic of three to four vehicles per minute on Station Road. However it is noted that all parallel routes within this area that are similar in nature are not included within the SRTM and these also form routes which may be used by re-assigning traffic during construction of the Onshore Cable Route at the Farlington Avenue / Havant Road / A2030 Eastern Road traffic signal junction. These include South Road, located immediately east of Station Road and Lealand Road. It is the Applicant's view that traffic reassignment will be shared between each of these routes, therefore reducing the increases in traffic flow on any one location. The Applicant also notes that the impact on Station Road (or other parallel routes) would only occur during works at the Farlington Road / Havant Road / A2030 Eastern Road traffic signal junction which as shown in the Framework Traffic Management Strategy (REP1-068) will take a maximum of 2-4 weeks depending on the final alignment of each cable circuit along Farlington Avenue and/or Evelegh Road. Discussions regarding the impacts on road safety are ongoing with PCC. The Applicant is preparing a Technical Note on this topic which will be shared as soon as possible. Discussions regarding the impact and any potential mitigation that may be required are ongoing between the Applicant and PCC, while noting that in reality the traffic changes quoted by PCC are unlikely to materialise given the availability of other 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	An update to the Framework Traffic Management Strategy (REP1-068) has been submitted by the Applicant at Deadline 1 which does not provide proposals to temporarily stop up streets in order to prevent use by reassigned traffic. The draft DCO (REP1-021) also does not contain such provision. The assessment undertaken using the SRTM is therefore robust and representative and no further modelling or assessment is required. The Applicant notes PCC's comment that some routes have a higher movement function than others within the PCC highway network and the potential impacts associated within traffic flow increases on these routes. Notwithstanding this, all

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	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.	routes form legitimate roads which may be used by traffic re-distributing away from the cable works on a temporary basis. Whilst the possibility of using temporary stopping up orders to prevent the redistribution of traffic onto unsuitable routes was considered by the Applicant prior to submission, this strategy was not taken further, and is no longer being considered. On this basis, additional modelling will not be necessary. The results of the construction traffic noise assessment, which includes the impact of traffic redistribution, are contained in section 24.6.13 of the ES (APP-139). In summary the effects from road traffic noise during the construction stage are predicted to be no greater than moderate adverse (not significant). The air quality modelling was undertaken using the SRTM data from the Transport Assessment. The predicted Do-Something concentrations are around 50% of the limit value for NO2 with properties in these areas predicted to experience either a negligible deterioration of up to 0.4 µg/m³ (up to 1% of the limit value), or no change in concentrations of NO2. As such it is not expected that residents along these gridded streets will be able to perceive any changes in actual air quality due to redirected traffic.
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.	The SRTM as a strategic traffic model has regard to the cumulative operation and performance of the highway network within Portsmouth which has been assessed within the Transport Assessment (APP-448) and Supplementary Transport Assessment (REP1-142). The traffic redistribution will therefore have taken account of constrained nature of the highway network on the A2030 Eastern Road where is meets with A27. On this basis the Applicant notes, and agrees with, PCC's comment in paragraph 5.6.14. 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.' This is due to the temporary nature of the works and the mitigation measures set out in the Framework Traffic Management Strategy (FTMS) (REP1-068)
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.	Noted and agreed.
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	The SRTM as a strategic traffic model has regard to the cumulative operation and performance of the highway network within Portsmouth which has been assessed within the Transport Assessment (APP-448) and Supplementary Transport

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	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.	Assessment (REP1-142). As noted in Section 2.2 of the Eastern Road Further Traffic Assessments Technical Note (Appendix E of the Supplementary Transport Assessment (REP1-142) the Solent Transport website describes the SRTM as "fully WebTAG compliant and is capable of providing outputs which can robustly support the development of transport strategies and schemes, provide information to support development of funding bids and business cases, and can inform land use strategies and development transport assessments." The SRTM Do-Something scenarios takes account of blocking back as a result of the interaction between junctions and impact of traffic management, which leads to the redistribution of traffic away from the construction works and as a consequence a reduced traffic flow within local junction capacity models. . The use of the SRTM, supported by local junction capacity models, is therefore the best tool available to assess the temporary impacts associated with construction of the Onshore Cable Route.
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.	The Applicant notes PCC's comments regarding the operation of junction away from the Onshore Cable Route during the construction period. These impacts have been robustly assessed using the SRTM using a future year scenario of 2026. Given the nature of the proposed development the impacts experienced at these junctions will be temporary in nature. The Applicant will seek to work with PCC so that the delivery of the Proposed Development is co-ordinated with the TCF works and other schemes as necessary, taking into account the programme mitigations provided for within the FTMS and the need to deliver the works efficiently so as to minimise impacts.
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.	At Copnor Road / Burrfields Road traffic signal junction the results of the junction capacity assessments are shown in Tables 147, 148 and 149 of the Transport Assessment (APP-448). The impact of the Proposed Development at the Milton Road / Veldar Avenue traffic signal junction is shown in Tables 156, 157 and 158 of the TA. The impact of the Proposed Development at A3 Mile End Road / Church Street / Hope Street / Commercial Road signalised roundabout is shown in Table 159, 160 and 161 of the TA. In all instances the increase in queue lengths shown between the Do-Minimum and Do-Something scenarios is not considered to be a material increase in the context of the Do-Minimum scenario queue lengths. Therefore the Applicant does not consider the impacts to be severe or to be capable of classification as such. The junction capacity assessments for Portsbridge roundabout are shown on Tables 138, 139 and 140 of the Transport Assessment. The Applicant notes PCC's comments regarding the operation of this junction however a comparison of the Do-Minimum and Do-Something scenarios show a limited impact on queue lengths on the M27 off-slip as a consequence of the segregated left-turn lane, by virtue of the

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		industry standard modelling methodology where traffic using this lane is omitted as a free flow lane that does not interact with the junction. The Applicant also notes that the impact on M27 offslip approach to Portsbridge Roundabout will occur only whilst works are being undertaken on the southbound carriageway on A2030 Eastern Road on Portsea Island. Dependent on the construction methodology selected , this impact will be for a maximum duration of between 7 and 19 weeks, and during the working hours of the appointed contractors, which are set out in the Onshore Outline APP-505 Rev CEMP (002) and requirement 15 of the dDCO (APP-019). These durations of impacts for the A2030 Eastern Road on Portsea Island are set out in Table 24 and Table 25 of the Framework Traffic Management Strategy (FTMS) (REP1-068). Noting the above, the Applicant does not consider that there will be an increased risk of increased accidents on the M27 off-slip approach to the Portsbridge Roundabout.
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.	In reference to B2177 Portsdown Hill Road Table 171 of the Transport Assessment (AP-171) showed that delays of up to one minute and queue lengths of 20-30 vehicles would occur as a result of the shuttle working traffic signals. Further sensitivity tests have been undertaken within Section 5.5.9. of the Supplementary Transport Assessment (REP1-142to determine the impact of proposed shuttle working on this link should a lower level of traffic distribution occur away from the Onshore Cable Route to that predicted by the SRTM. This assessment showed queues of approximately 29-44 vehicles in the AM peak and 57-69 vehicles in the PM peak as a result of the shuttle working traffic signals. The Applicant however considers that such a level of delay would be unlikely to occur in reality, with traffic likely to instead re-assign to alternative routes as shown and assessed by the SRTM. Section 2.13 of the Framework Traffic Management Strategy (FTMS) (REP1-068) sets out the responsive traffic management approach which is to be taken when constructing the Onshore Cable Corridor. Included in Section 2.13 is the protocol to temporarily suspend and remove works or alter traffic management strategies if a road traffic accident, emergency event or other unforeseen circumstances occur on either the Onshore Cable Corridor or surrounding network and requires road closures and diversion of traffic. This protocol is supported via the protective provisions for the protection of highways and traffic in the dDCO (), which at paragraph 4(2) allows any detailed traffic management strategy to be revised where necessary in the event of unforeseen circumstances and paragraph 10 which allows directions to be given in relation to works in the event of an emergency or where necessary to secure the safety of the public. The FTMS also provides programme restrictions that prohibits construction work from being completed simultaneously in close proximity to each other, with Section 7.6 showing that closure of Havant Road cannot take place at the same time as construction works are being completed on Portsdown Hill Road.

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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.	A meeting was held with First Group (First Hampshire & Dorset) on the 22nd August 2019 to discuss the Proposed Development and the potential impact to local bus services in the Portsmouth and South Hampshire area. The Applicant is keen to continue engagement with First Group, with a further meeting on 8th October 2020. The Minutes of this meeting have been shared with First Group for agreement and will be shared with PCC as soon as possible.. At this meeting, First Group noted the anticipated construction programme and that the Framework Traffic Management Strategy was comprehensive and well planned. No request was made to the Applicant regarding requirements for additional services to mitigate the impacts of construction. The Applicant will seek to work with PCC so that the delivery of the Proposed Development is co-ordinated with the TCF works and other schemes as necessary, taking into account the programme mitigations provided for within the FTMS and the need to deliver the works efficiently so as to minimise impacts.
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.	Refer to response to paragraph 5.1.31 regarding engagement with First Group. A meeting is scheduled with Stagecoach on 21/10/2020 to discuss the proposals. Additional assessments of delay to bus services, both along the cable corridor or in the wider impact area, have been included in Section 6 of the Supplementary Transport Assessment (REP1-142). These additional assessments do not cover all bus routes within the study area, a cross-section of routes has been selected for analysis to provide an overall assessment of impacts along key corridors across Onshore Cable Corridor and the wider area impacted by the redistribution of traffic. Included within the assessment undertaken is Bus Route 21 service, which travels via A2047 London Road. The assessment shows a maximum increase in journey time of 2% of the Route 21 service in either Do Something scenario when compared to the Do Minimum.
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.	The approach being taken for cyclists at traffic management locations is detailed in 2.9.3. of the Framework Traffic Management Strategy (FTMS) (REP1-068). This aligns with the Traffic Signs Manual, Chapter 8 for the provision of temporary cycle facilities at street works. As with the overall works, any closure will be limited to 100 m at a time as the construction zone progresses along the A2030 Eastern Road. Where works are completed on-carriageway, shared-use paths and footways will be retained in their existing layout.

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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.	With regard to Milton Common, the Applicant has submitted at Deadline 1 a Note on PRoW, Long Distance Walking Paths and Cycle Route Diversions (ES Addendum (REP1-139) Appendix 14) that provides further information the length and timeframes of likely diversion routes required during construction of the Onshore Cable Route. Within Section 1.3.6 of this document it is noted that protective fencing will be erected north to south within the Order Limits with openings, allowing users of the Permissive Paths to move across Milton Common at marked crossed points. Crossings will be unavailable only when duct installation occurs in that specific point, requiring diversions for 1-2 weeks per circuit. Section 2.9.2. of the Framework Traffic Management Strategy (FTMS) (APP-448 Rev 002) sets out the strategy to be implemented for pedestrians affected by the construction of the Onshore Cable Route. As is noted in Section 2.9.2., temporary replacement of existing pedestrian crossings will be implemented should an existing crossing need to be closed to facilitate construction. Provision of temporary crossings will directly replace any which will be temporarily suspended due to construction works. As such, any temporarily suspended signalised crossings will be mitigated by the provision of a temporary replacement signalised crossing.
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 section7/8/9 (along A2030 Eastern Road), give scope for significant difference in impact upon the Highway Network.	The Applicant strongly disagrees with the statement. The limited limits of deviation provided for within the Order limits are necessary and proportionate to ensure the Proposed Development may be constructed without impediment with the ability to navigate existing services, thereby avoiding the need for service diversions. The impacts on the highway have been robustly assessed, as evidenced by the comments made by the transport officer in relation to the assessment.
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.	The location of the joint bays will be off the roads, (e.g. in verges, parks) where practicable, with this secured in the updated Onshore Outline CEMP (REP1-087) and secured by requirement 15 of the dDCO (REP1-031). The location of the joint bays cannot be confirmed now as it is a matter to be addressed at detailed design. Detailed design approvals for all works in Portsmouth will be approved by PCC. The Joint Bays will be located along the cable route, with indicative locations for them assessed. Within Chapter 22 of the ES (APP-137) it has been assumed that all Joint Bays would result in the same predicted impacts and significance of effect as the proposed traffic management requirements required to facilitate installation of cable ducts This is because all potential Joint Bays locations have been selected on the basis that construction could be facilitated by similar or less disruptive traffic management when compared with installation of the ducting for the Onshore Cable

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		Route. Construction of Joint Bays will also be completed using the same construction working hours and will generate a similar number of construction traffic movements as the installation of cable ducts for the Onshore Cable Route. Further to this, Section 3.9 of the Supplementary Transport Assessment (REP1-142) and Section 15 of the ES Addendum (REP1-139) include an assessment of abnormal load HGV movements associated with delivery of cable drums to required Joint Bay locations. This assessment has concluded that these HGV movements do not result in any significant effects in relation to the construction of Joint Bays
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.	Early contractor involvement has included a full utility search conducted within the extremities of the Order limits, identifying several potential routes through the highway / off highway for cable installation. The exact alignment of the onshore cable route will be confirmed at the detailed design stage when the contractor will decide on the precise route alignment having regard to utility and other constraints, and subject to the requirements of the Order. The OOCEMP (REP1-087) which is secured in the dDCO (REP1-021) by requirement 15 in section 5.5.1.1 requires a watching brief to be implemented during excavation to ensure that any unexpected contamination within the Made Ground (if present) is rapidly identified, risk assessed and dealt with appropriately The construction of the onshore cable route within the highway has been fully assessed within the Chapter 22 of the Supplementary Transport Assessment (REP1-142) and ES addendum (REP1-139).
5.2.4	No engagement has been carried out with the LHA with regards method of access to the ORS compound.	This access will be located on the southern side of the ORS compound and directly from the public car park. A new permanent access is not required onto Fort Cumberland Road, and therefore no access from the highway. This is shown in Section 7.5 of the Design and Access Statement (APP-14 Rev 002).
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.	The approach being taken for pedestrians and cyclists at traffic management locations is detailed in 2.9 of the Framework Traffic Management Strategy (FTMS) (REP1-068). This aligns with Traffic Signs Manual, Chapter 8 for the provision of temporary cycle facilities at street works. As with the overall works, any closure will be limited to 100 m at a time as the construction zone progresses along the A2030 Eastern Road. Where works are completed on-carriageway, shared-use paths and footways will be retained in their existing layout.
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	The approach taken within the Transport Assessment (APP-448), including the scope of the SRTM modelling undertaken, was agreed with PCC in scoping discussions undertaken pre-submission at a meeting held on 03/07/19. As was agreed with both PCC and HCC, the SRTM modelling undertaken is representative of a worst-case scenario.

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	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.	As per additional requests raised by PCC in their relevant representation (RR-185), additional assessments of the impact of works on the A2030 Eastern Road between Tangier Road and Eastern Avenue have been completed and are included in the Eastern Road Traffic Assessment Technical Note which is included in Appendix E, and summarised in Section 5.4 of the Supplementary Transport Assessment (REP1-142).). The Eastern Road Technical Note assesses the impact that traffic management would have on between Tangier Road and Eastern Avenue. The results of the assessment undertaken with the Eastern Road Technical Note demonstrated that TM between Tangier Road and Eastern Avenue yielded similar results in terms of traffic delay and journey time changes to those in in the TM scenario assessed within the SRTM between Airport Service Road and Burrfields Road. Given that there will only ever be a single instance of TM on the A2030 Eastern Road at any one time there will not be greater cumulative effects of more than one TM location. The further assessment in this TN validates that the assessment of the A2030 Eastern Road completed in the TA and using the SRTM is robust and representative. The Applicant notes, and agrees with, PCC's comment in paragraph 5.6.14. 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.'
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.	Refer to the response to paragraph 5.1.28. The Applicant will seek to work with PCC so that the delivery of the Proposed Development is co-ordinated with the TCF works and other schemes as necessary, taking into account the programme mitigations provided for within the FTMS and the need to deliver the works efficiently so as to minimise impacts.
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.	The Transport Assessment (APP-448) and Chapter 22 of the ES (APP-137) has provided an assessment of the impacts on standard assessment metrics: pedestrian and cycle, severance, fear and intimidation and pedestrian and cycle amenity. Furthermore, the Supplementary Transport Assessment (REP1-142) and ES Addendum (REP1-139) provides an assessment of the delay to bus services along the Onshore Cable Corridor and wider study area. Where significant effects have been identified these will be mitigated through measures included within the Construction Traffic Management Plan (REP1-070) and Framework Traffic Management Strategy (REP1-068). The assessment of delay to bus services has predicted that there will no significant effects associated with construction of the Onshore Cabe Route. The mitigations applicable to the installation of the Onshore Cable Route in public highway are included in the Framework Traffic Management Strategy (REP1-068).
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	The Applicant is producing a Road Safety Technical Note which will consider the safety implications of increased traffic flows on links, and increased queueing at

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	in the impact assessment preventing a clear understanding of the construction impacts and mitigation options.	junctions and traffic management locations within Portsmouth in response to this comment and will provide a further update in this regard in due course.
5.3	**ES Appendix 22.1A Framework Traffic Management Strategy - 6.3.22.1A**	
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.	Full road closures of A2030 Eastern Road are not proposed at any point. Single lane closures are proposed to facilitate duct installation on the A2030 Eastern Road. The traffic management proposals for A2030 Eastern Road are set out in Section 7.8 and Section 10 of the Framework Traffic Management Strategy (FTMS) (REP1-068). The traffic management proposals set out include the working hours. As is also stated in the FTMS (REP1-068), all disruption due to traffic management is temporary in nature.
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.	A minimum width of footway of 1m is proposed in paragraph 2.9.2.1. of the Framework Traffic Management Strategy (FTMS) (REP1-068). The minimum width of footway proposed is in accordance with guidance set out in paragraph D3.32.6 of Chapter 8 (part 1) of the DfT guidance document entitled 'Traffic Safety Measures and Signs for Road Works and Temporary Situations' (2009). Paragraph D3.32.6 states that 'temporary pedestrian ways should never be less than 1 m wide'.
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.	The approach being taken for cyclists at traffic management locations is detailed in 2.9.3. of the Framework Traffic Management Strategy (FTMS) (REP1-068), which states the following: "Where full closures of cycle route is necessary and diversion routes are unsuitable temporary cycle facilities will be provided past the construction corridor where possible, such as on the Eastern Road shared use path. This could be completed as part of a full lane closure or through provision of a temporary off-road route. The width of these temporary routes will be 2.5 m where possible with a minimum of 1.5 m. If the temporary route is provided over unmade ground, then footway boards will be used to provide a formal surface. In some cases, it may be required to narrow a shared-use path past the construction corridor to a width that is not suitable for cycle use (I.e. 1.0 m). In these circumstances 'Cyclist dismount and use footway' signs will be used as a last resort, noting that this would only be completed for one 100 m section at a time." This aligns with Traffic Signs Manual, Chapter 8 for the provision of temporary cycle facilities at street works and therefore the Applicant considers the provision to be appropriate. Where works are completed on-carriageway, shared-use paths and footways will be retained in their existing layout.
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	Section 2.13 of the Framework Traffic Management Strategy (FTMS) (REP1-068) sets out the responsive traffic management approach which is to be taken when constructing the Onshore Cable Corridor. Included in Section 2.13 is the protocol to temporarily suspend and remove works or alter traffic management strategies if a road

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	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.	traffic accident, emergency event or other unforeseen circumstances occur on either the Onshore Cable Corridor or surrounding network and requires road closures and diversion of traffic. This protocol is supported via the protective provisions for the protection of highways and traffic in the dDCO at paragraph 4(2), which allows any detailed traffic management strategy to be revised where necessary in the event of unforeseen circumstances, and paragraph 10 which allows directions to be given in relation to works in the event of an emergency or where necessary to secure the safety of the public. Public activities and events in proximity to the Converter Station and Onshore Cable Corridor have already been taken into account within the FTMS with programme restrictions applied where necessary in relation to the following: • School term time; • Football season; • Great south Run; • South Central Festival; and • Victorious Festival . In addition, the FTMS contains programme restrictions to prohibit construction from taking place simultaneously in close proximity and proposes that any temporary traffic signals are managed manually during peak hours. The FTMS and programme restrictions contained within it are secured by the protective provisions for the protection of highways and traffic at Part 5 to Schedule 13 to the dDCO (REP1-0221). The Applicant therefore considers these restrictions to be appropriate to mitigate the impact of constructing on the Onshore Cable Route within the PCC highway network. The Applicant welcomes further details of the Routes 4U App so it can be considered if this can be incorporated in to the Communication Strategy included in Appendix 1 of the FTMS
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	All scheduling of works will be in accordance with the Framework Traffic Management Strategy (FTMS) (REP1-068) which includes programme restrictions in relation to works in proximity to one another to avoid cumulative effects. Compliance with the programme restrictions in the FTMS is secured via the protective provisions for the protection of highways and traffic provided for at Part 5 of Schedule 13 to the dDCO (REP1-021). Details to be submitted and approved for all works includes a schedule of timings for the works, including the dates and durations for any closures of any part of the public highway. PCC will be responsible for approving all traffic management strategies which are to include these details. Discussions would need to take place in relation to any other works required during the period of construction to avoid conflicts, and with good communication from PCC it is not foreseen this will cause any particular issues.

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	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.	With regard to the indicative programme, the Applicant is absolutely confident that the Proposed Development may be constructed within the indicative timescales having undertaken programming work to inform that the position is realistic and to test the assumptions taking into account the programme mitigations to be provided by the FTMS and in relation to other receptors, such as the winter working restriction in relation to Brent Geese, to inform the ongoing procurement tender exercise. The release of this information into the public domain would fundamentally undermine the procurement exercise and therefore it will not be released. To ensure the robustness of the assumptions made in relation to the overall duration of the installation of the Onshore Cable Route the Applicant has further tested cable installation rate assumptions, as detailed with the ES Addendum (REP1-139). This exercise, which takes into account information provided by experienced cable engineers within the project team in addition to information provided by experienced third party cable installation contractors, has further evidenced the robustness of the assumptions in relation to the overall installation duration. It should be noted that the assumptions specifically take into account the need to navigate existing utilities in areas of identified heavy service congestion. Full utility searches have been conducted within the Order limits to identify existing utilities to the best available level possible without breaking open the surface of the highway (which is not appropriate or necessary at this time), identifying a single utility owner where there is potential for a diversion. All utility plans have been discussed with the relevant owners, with work ongoing with regards to protective provisions.
5.3.8	FTMS 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.	The 'Onshore Cable Route Construction Impacts on Access to Properties and Car Parking and Communication Strategy' which is included in Appendix 1 of the Framework Traffic Management Strategy (FTMS) (REP1-068) sets out the strategy for access to residential properties throughout works. Where single lane closures are required during construction of the Onshore Cable Route vehicle access will be unavailable during construction working hours (7am to 5pm), except for emergencies and for vulnerable persons. Outside of construction working hours access to properties and driveways will be provided through road plates which will be used to bridge the trench. Where full road closures are required vehicle access will be unavailable for the entirety of the road closure, including outside of construction working hours, except in emergencies. As is stated in paragraph 4.3.1.1. of the document, pedestrian and bicycle access to residential properties will be maintained at all times, as will access for those using wheelchairs, mobility scooters and pushchairs.
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	Paragraph 8.1.1.6 of the Framework Traffic Management Strategy (FTMS) (REP1-068) sets out traffic management proposals for Fitzherbert Road. As is set out in paragraph 8.1.1.6, there is the possibility of 24hour working on Fitzherbert Road in order to minimise the total duration of disruption to Sainsbury's and B&M Home Store.

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	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.	Where this occurs, the noisiest activities (road cutting / breaking and resurfacing) will be avoided between 22:00 and 07:00. Discussions are on-going with Sainsbury's regarding the proposals.
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.	Set out in Section 10 of the Framework Traffic Management Strategy (FTMS) (REP1-068) are the calendar restrictions for the on-carriageway works on A2030 Eastern Road on Portsea Island. As is stated, in Table 24 and Table 25 of the Framework Traffic Management Plan (FTMS) (REP1-068), there are 16 -17 weeks of availability per calendar year for on-carriageway works on A2030 Eastern Road on Portsea Island. The programme extends across multiple calendar years, which will allow sufficient time for the works to be completed in alignment with the calendar restrictions set out. The calendar restrictions set out in the FTMS (REP1-068) are secured via the protective provisions for the protection of highways and traffic contained at Part 5 of Schedule 13 to the Draft Development Consent Order (dDCO) (REP1-021).
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. 3weeks. 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.	APP The Applicant confirms that the shuttle working along Henderson Road will be split into 3 x 100m sections. In all cases, the construction will take place in 100 m sections. As is set out in paragraph Paragraph 2.5.1.2. of the Framework Traffic Management Strategy (FTMS) (REP1-068), REP1-068),) which states that: "it is anticipated that the cable duct installation will take place in 100 m sections, generally taking approximately five working days to complete each section including reinstatement of the highway. Where progress is anticipated to be slower, a shorter section may be used to ensure that each section is only in place for approximately one week at any one time."
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.	As is set out in the Framework Traffic Management Strategy (FTMS) (REP1-068), final TMS to be implemented for each phase of the Proposed Development will be dependent on the detailed design of the Onshore Cable Corridor and contractor preferences, noting the requirements contained within this document and the Contractor's Technical Specification. This is secured via the protective provisions for the protection of highways and traffic contained at Part 5 of Schedule 13 to the Draft Development Consent Order (dDCO) (APP-019). The traffic management strategy to be implemented in relation to those works, including details of any traffic signals and signs and any traffic regulation

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		measures proposed in connection with those works is required to be submitted and approved. As is noted in Section 2.9.2. of the FTMS, temporary replacement of existing pedestrian crossings will be implemented should an existing crossing need to be closed to facilitate construction. Provision of temporary crossings will directly replace any which will be temporarily suspended due to construction works. As such, any temporarily suspended signalised crossings will be mitigated by the provision of a temporary replacement signalised crossing.
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.	Please refer to the response in relation to 5.3.7 above.
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.	A minimum width of footway of 1m is proposed in paragraph 2.9.2.1. of the Framework Traffic Management Strategy (FTMS) (REP1-068). The minimum width of footway proposed is in accordance with guidance set out in paragraph D3.32.6 of Chapter 8 (part 1) of the DfT guidance document entitled 'Traffic Safety Measures and Signs for Road Works and Temporary Situations' (2009). Paragraph D3.32.6 states that 'temporary pedestrian ways should never be less than 1 m wide'.
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.	APP The 'Onshore Cable Route Construction Impacts on Access to Properties and Car Parking and Communication Strategy' which is included in Appendix 1 of the Framework Traffic Management Strategy (FTMS) (REP1-068) sets out the strategy for access to residential properties throughout works. Where Single lane closures are required during construction of the Onshore Cable Route vehicle access will be unavailable during construction working hours (7am to 5pm), except for emergencies and for vulnerable persons. Outside of construction working hours access to properties and driveways will be provided through road plates which will be used to bridge the trench. Where full road closures are required vehicle access will be unavailable for the entirety of the road closure, including outside of construction working hours, except in emergencies. As is stated in paragraph 4.3.1.1. of the document, pedestrian and bicycle access to residential properties will be maintained at all times, as will access for those using wheelchairs, mobility scooters and pushchairs. However, during the construction period some residential and business properties will experience temporary restrictions

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		to vehicular access, including driveway access. As is also stated in paragraph 4.3.1.1., measures will be taken to limit access disruption where possible.
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.	The construction methodology for the construction of the Onshore Cable Route does not allow for traffic management measures to be removed during peak hours. The Applicant has considered this through the implementation of the programme restrictions contained within the Framework Traffic Management Strategy (REP1-068) which prohibits construction from taking place on traffic sensitive routes during periods of the year when traffic flow is at its highest. On the A2030 Eastern Road for example, construction will only be permitted during the Easter school holidays, May half-term, June, July and August. The core working hours for construction of the Onshore Cable Route will be 07:00-17:00 Monday to Friday and 08:00-13:00 on Saturdays while working outside of these hours will be required in some locations to mitigate traffic impact. This is outlined in the Onshore Outline APP-505 Rev CEMP (002) and requirement 15 of the dDCO (APP-019). The impacts of construction work taking place during peak periods have been assessed within the Transport Assessment (APP-448) , ES Chapter 22 (APP-137), ES Addendum (REP1-139) and Supplementary Transport Assessment (REP1-142).
5.5	**5.5 - 6.3.22.2 ES Vol 3 Appendix 22.2 Framework Construction Traffic Management Plan**	
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.	Section 2.5 of the Framework Construction Traffic Management Plan (FCTMP) (REP1-070) sets out further information regarding generic laydown areas. This states that to facilitate construction, temporary laydown areas may be created at Joint Bay locations (which are be confirmed as part of the detailed design approvals) to store materials such as cable ducting and arisings from the works. The location of the joint bays will be off the roads, (e.g. in verges) where practicable, with this secured in the updated Onshore Outline CEMP (REP1-087) which in turn is secured by requirement 15 of the dDCO (REP1-031). A generic layout area is shown on Plate 1 of the FCTMP, which shows an area 14m by 8m will be required plus an additional 5m width for vehicle access. These areas will be used solely for the storage of materials are arisings and now welfare facilities will be provided at welfare areas.
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	It is acknowledged that there was an error in the definition of 'abnormal vehicle' included within the submission. For clarification, the Applicant notes the official definition of an 'abnormal load', as is set out by Driver and Vehicle Standard Agency ('DVSA')[1] is as follows: "An 'abnormal load' is a vehicle that has any of the following: • A weight of more than 44,000 kg

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	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.	• An axle load of more than 10,000kg for a single non-driving axle and 11,500kg for A single driving axle • A width of more than 2.9 metres • A rigid length of more than 18,65 metre." This error has been addressed in the Supplementary TA (REP1-142)), which also includes an assessment of abnormal load movements associated with the delivery of cable drums to Joint Bay locations along the Onshore Cable Route. The assessment of Joint Bay locations has shown that access will be achievable to all locations without the need for significant highway layout alterations and without generating significant environmental effects. It should also be noted that, as stated in Section 2.8.7 of Framework Construction Traffic Management Plan) (REP1-070), the management of abnormal loads and Abnormal Indivisible Loads (AILs) will comply with the statutory regulations in terms of consulting with the relevant highway authority, police and other stakeholders. The routing and timing of abnormal loads and AILs will be agreed and communicated to minimise impact to residents and other road users as appropriate.
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.	Joint bays will be located away from the carriageway (e.g. in verges) where practicable with this secured in the updated Onshore Outline CEMP (APP-505 Rev 002) and requirement 15 of the dDCO (APP-019). Section 3.9 of the Supplementary Transport Assessment (REP1-142) and Section 15 of the ES Addendum (REP1-139) include an assessment of abnormal load HGV movements associated with delivery of cable drums to required Joint Bay locations. This assessment has concluded that these HGV movements do not result in any significant effects in relation to the construction of Joint Bays The number of joint bays permissible per cable circuit is clearly set out in Chapter 3 to the ES (APP-118) and Schedule 1 to the dDCO (REP1-021).
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).	Paragraph 3.5.6.1. of the Framework Construction Traffic Management Plan (FCTMP) (REP1-070) acknowledges the weight limit on the Eastern Road bridge south of the A27. Further information regarding the proposed routing of HGV's is included in Section 3.4 of the FCTMP (REP1-070), this proposed routing accounts for the weight restriction on the Eastern Road bridge, and does not route traffic through across it. An assessment of the feasibility of cable drums to indicative Joint Bay locations has also been completed which accounts for the weight The assessment of abnormal load routes contained within Section 3.9 of the Supplementary Transport Assessment (REP1-142) and Section 15 of the ES Addendum (REP1-139) is based on HGV routing that adheres to the weight restriction on Eastern Road and therefore routes all abnormal loads from Portsmouth Cargo Terminal to locations on Portsea Island via A3 Commercial Road, A3 Marketway, A3 Anglesea Road, A2030 Winston Churchill Avenue, A2030 Victoria Road North, A2030

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		Goldsmith Avenue, Fratton Way and Rodney Road. This assessment has concluded that these HGV movements do not result in any significant effects in relation to the delivery of cable drums to indicative Joint Bay locations. The HGV routing set out in the FCTMP (REP1-070) is secured via Requirement 17 of the draft Development Consent Order (dDCO) (REP1-021).
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.	The referenced text has been removed from the most recent revision of the Framework Construction Traffic Management Plan (FCTMP) (REP1-070).
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.	Restrictions set out in paragraph 2.3.1.8. of the Framework Traffic Management Strategy (REP1-068) state that a maximum of six gangs will be able to work on-carriageway at any one time. This restriction provided for by the FTMS are secured by the protective provisions for the protection of highways and traffic contained at Part 5 of Schedule 13 to the draft Development Consent Order (dDCO) (REP1-021).
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.	Paragraph 5.3.9.2. of the Framework Construction Traffic Management Plan (FCTMP) (REP1-070) set out the proposals relating to the East Solent Coastal Partnership (ESCP) compound. As is stated in paragraph 5.3.9.2., use of the compound will only be considered if this compound is no longer required by ESCP. Discussions are ongoing between the Applicant and ESCP regarding programming of works to ensure conflicts are avoided wherever possible.
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.	It is anticipated that construction vehicles will use the existing access to Fort Cumberland car park, which will require the temporary removal of the existing height barrier. As some capacity will remain for public car parking during this period the Applicant agrees to re-provide this in the form of a managed access to prevent unauthorised vehicle access. This will be added to the Framework Construction Traffic Management Plans (REP1-070).
5.6	**Technical Note ERTN01 – Eastern Road Further Traffic Assessments**	
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.	The Applicant confirms the traffic flows within the modelling undertaken were correct. Errors in stated traffic flows were in the in text tables in Section 1.5 of the Transport Assessment (TA) (APP-448) only, as is stated in Section 3.2 of the Eastern Road Technical Note which is included in Appendix E of the Supplementary Transport Assessment (REP1-142).

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	• 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.	Within Table 5 of the Eastern Road Technical Note the northbound traffic flow on the A2030 Eastern Road between Airport Service Road and Burrfields Road is 1,201 vehicles in the AM peak and 908 vehicles in the PM peak. In the SRTM Do-Minimum scenario the same link has a northbound traffic flow of 1,651 vehicles in the AM peak (Table 12) and 1,615 vehicles in the PM peak (Table 13). Within Table 6 of the Eastern Road Technical Note the southbound traffic flow on the A2030 Eastern Road between Airport Service Road and Burrfields Road is 1,306 vehicles in the AM peak and 1,819 vehicles in the PM peak. In the SRTM Do-Minimum scenario the same link has a southbound traffic flow of 1,655 vehicles in the AM peak and 2,247 vehicles in the PM peak. This shows the robust nature of the traffic flows used within the SRTM to assess the impacts of construction of the Onshore Cable Route as contained within the Transport Assessment (APP-448), Chapter 22 of the ES (APP-137), Supplementary Transport Assessment (REP1-142) and ES Addendum (REP1-140).
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.	The Applicant notes comments regarding match day traffic flow. The Applicant's response regarding match day traffic is included in response to WQ1 TT.1.16.18 (REP1-091).
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.	The Applicant is producing a Road Safety Technical Note which will consider the safety implications of increased traffic flows on links, and increased queueing at junctions and traffic management locations within Portsmouth in response to this comment and will provide a further update in this regard in due course. The Applicant notes PCC's comment regarding the different patterns of traffic redistribution as a result of a lane closure south of Tangier Road but based on professional judgement estimates that similar impacts from traffic redistribution would occur as shown in the Transport Assessment (APP-448), Chapter 22 of the ES (APP-137), Supplementary Transport Assessment (REP1-142) and ES Addendum (REP1-140). It is the Applicant's view that the impacts of traffic redistribution resulting from construction at Eastern Road / Tangier Road would be similar to those already assessed within the SRTM albeit in different locations on the PCC highway network. The impacts of construction of the Onshore Cable Route on the Eastern Road /

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	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.	Tangier Road traffic signal junction are assessed within the Eastern Road Further Traffic Assessments Technical Note (Appendix E of the Supplementary Transport Assessment (REP1-142).
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.	The Applicant understands that it may be possible to avoid the requirement for lane closures during the PM peak periods (taking account of the 7am-5pm construction working hours) through construction taking place in the first third of the nearside lane and traffic management pulled tight to the excavation. Best endeavours will therefore be made to incorporate these proposals, noting that the ability to do so will be confirmed during detailed design of the Onshore Cable Route and associated traffic management.
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 reroute. 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.	the impacts of construction work at the A2030 Eastern Road / Tangier Road traffic signal junction will be temporary in nature and will be mitigated through measures included within the Framework Traffic Management Strategy (REP1-068). The extent of traffic redistribution is assessed within the Transport Assessment (APP-448), the Supplementary Transport Assessment (REP1-142), Chapter 22 of the Environmental Statements (APP-137) and Chapter 15 of the Environmental Statement Addendum (REP1-139), and are based upon a worst-case scenario, as is detailed in Section 1.10.3. of the Transport Assessment (APP-448). It is the Applicant's view that the impacts of traffic redistribution resulting from construction at Eastern Road / Tangier Road would be similar to those already assessed within the SRTM albeit in different locations on the PCC highway network. The impacts of construction of the Onshore Cable Route on the Eastern Road / Tangier Road traffic signal junction are assessed within the Eastern Road Further Traffic Assessments Technical Note (Appendix E of the Supplementary Transport Assessment (REP1-142). It is therefore concluded that the similarity of results presented validates that the assessment of the A2030 Eastern Road completed in the TA using the SRTM is robust and representative.
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	All assessments have been undertaken using a worst-case scenario as is modelled within the SRTM, further details of which can be seen in Section 1.10.3. of the Transport Assessment (APP-448). The SRTM modelling includes an element of traffic redistribution in order to account for the indirect impacts of traffic routing away from

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	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.	congested conditions. Further details regarding how traffic redistribution within the SRTM works can be found in Section 4.2 of the Eastern Road Technical Note which is included in Appendix E of the Supplementary Transport Assessment (REP1-139). The Applicant notes that SRTM does not include every part of the highway network within Portsmouth and therefore has redistributed traffic across a limited network. In reality traffic will be able to redistribute across a wider variety of routes resulting in lower overall impacts on any singular routes.Mitigation measures which are set out in Framework Traffic Management Strategy (REP1-068) and the Framework Construction Traffic Management Plan (REP1-070) minimise the extent of disruption to be caused by the construction works associated with the delivery of the project.
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).	The impacts of construction works on the road network have been fully assessed with the Transport Assessment (APP-448), the Supplementary Transport Assessment (REP1-142), Chapter 22 of the Environmental Statements (APP-137) and Chapter 15 of the Environmental Statement Addendum (REP1-139). The impacts of the proposed construction works will be mitigated through measures included within the Framework Traffic Management Strategy (REP1-068) and the Framework Construction Traffic Management Plan (REP1-070). Section 2.13 of the Framework Traffic Management Strategy (FTMS) (REP1-068) sets out the responsive traffic management approach which is to be taken when constructing the Onshore Cable Corridor. Included in Section 2.13 is the protocol to temporarily suspend and remove works or alter traffic management strategies if a road traffic accident, emergency event or other unforeseen circumstances occur on either the Onshore Cable Corridor or surrounding network and requires road closures and diversion of traffic. This protocol is supported via the protective provisions for the protection of highways and traffic in the dDCO (REP1-021), which at paragraph 4(2), allow any detailed traffic management strategy to be revised where necessary in the event of unforeseen circumstances and paragraph 10 which allows directions to be given in relation to works in the event of an emergency or where necessary to secure the safety of the public. The Applicant therefore considers that the FTMS provides necessary protocols to maintain the resilience upon the highway network. All assessments have been undertaken using a worst-case scenario as is modelled within the SRTM, further details of which can be seen in Section 1.10.3. of the Transport Assessment (APP-448). The SRTM modelling includes an element of traffic redistribution in order to account for the indirect impacts of traffic routing away from congested conditions. Further details regarding how traffic redistribution within the

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		SRTM works can be found in Section 4.2 of the Eastern Road Technical Note which is included in Appendix E of the Supplementary Transport Assessment (REP1-139). With regard to second and third level impacts the Applicant notes that the SRTM does not include every part of the highway network within Portsmouth and therefore has redistributed traffic across a limited network. In reality traffic will be able to redistribute across a wider variety of routes resulting in lower overall impacts on any singular routes.
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.	The Applicant is producing a Road Safety Technical Note which will consider the safety implications of increased traffic flows on links, and increased queueing at junctions and traffic management locations within Portsmouth in response to this comment and will provide a further update in this regard in due course.

4. APPLICANT'S COMMENTS ON HAMPSHIRE COUNTY COUNCIL LIR

4.1. INTRODUCTION

4.1.1.1. This section of the document contains the Applicant's response to HCC's LIR (REP1-167).

4.1.1.2. The Applicant has structured their response in line with the LIR submitted by HCC.

4.1.1.3. The Applicant has reviewed the contents of the LIR and has provided responses to points where it is considered this will assist the ExA in considering the point raised in the LIR.

5. COMMENTS ON HAMPSHIRE COUNTY COUNCIL LOCAL IMPACT REPORT

5.1. APPLICANT'S COMMENTS ON LOCAL IMPACT REPORT

Table 5.1 – Applicant's Comments on Hampshire County Council Local Impact Report

Para No.	Local Impact Report Statement	Applicant's Response
5.7	The Applicant and Highway Authority held further discussions prior to the submission of the DCO application to discuss the scoping of the Transport Assessment and the use of the Sub-Regional Transport Model. The use of the model offers the potential to understand the re-distribution of traffic on the road network as a result of the temporary traffic management measures in place during the construction of the cable route. Future potential disruption to the network arising from ongoing maintenance of the cable route, and its eventual decommissioning, is expected to be appraised on a case-by-case basis.	The use of the SRTM model allows for an understanding of the re-distribution of traffic on the road network as a result of the temporary traffic management measures in place during the construction of the cable route and this is agreed, as per previous discussions on scoping. In respect of decommissioning, activity is expected to be less than that associated with the construction of the works, as it is likely the case that ducts would remain in situ rather than the highway being excavated to remove them. However, this is a matter that would be decided at the time, which is some distance in the future noting the expected minimum operational lifetime of the Proposed Development is 40 years. In the event excavation were to take place, the works undertaken would be similar to the construction works.
5.10	Section 1 Lovedean (Converter Station Area) This area of work is mainly off-highway through the converter station site. The highway works associated with this section are the site access works, for which comments have been provided in paragraph 5.37-5.41 and Appendix 5. Insufficient information has been submitted, to date, on the potential impact on Horndean Footpath 4	Further information on the assessment of impacts on Horndean Footpath 4 is included within Section 1.2 of ES Addendum Appendix 14 – Note on PRoW, Long Distance Walking Paths and Cycle Route Divisions (REP1-145)
5.11	Section 2 Anmore This section of the cable route is primarily off the highway except for the crossing of Anmore Road and Denmead Footpath 13. Information is sought on how vehicular access to the field south of Anmore Lane is to be provided to ensure an appropriate and safe access from the highway for construction and maintenance vehicles. It is noted that Anmore Lane is a narrow single carriageway lane which generally would not be considered appropriate for construction traffic without suitable controls in place.	Further information is provided on the access junction requirements for Anmore Road in First Written Question Responses to DCO1.5.68 – Appendix 6 Access and Rights of Way: Explanatory Document (REP1-097). At this location, the new temporary access will require removal of the existing gate and hedgerow, provision of a vehicle crossover and new kerb to form a gated access. The gates will be set-back from the highway to prevent vehicles blocking the carriageway. At this stage the exact location of temporary access junctions within the Order Limits is not confirmed as these will be dependent on the final alignment of the Onshore Cable Route, which will be confirmed during detailed design taking into account existing constraints (i.e. ground conditions). Further to recent discussions with HCC the Applicant is preparing a "Construction Access Standard Detail Document" to provide a layout for all construction access locations and the design criteria which will need to be met. The Applicant welcomes the views of HCC on this document in due course. The use of Anmore Lane for construction traffic is prohibited as shown in Section 3.4 of the Framework Construction Traffic Management Plan (FCTMP) (REP1-070).
5.12- 5-13	Section 3 Denmead/Kings Pond Meadow Section 3 of the cable route covers the area between Anmore Road and B2150 Hambledon Road. Heading south from Anmore Road the route runs	Further information is provided on the access junction requirements for B2150 Hambledon Road in First Written Question Responses to DCO1.5.68– Appendix 6 Access and Rights of Way: Explanatory Document (REP1-097). At this location, the new temporary access will require removal

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	through Kings Pond Meadow, to the field north of Hambledon Road. Again, confirmation is required on how vehicular access for construction traffic is to be obtained due to restricted carriageway widths and no clear indication or details of the access requirements for construction. Flexibility is proposed within the order limit for the works to either locate the construction compound north or south of Hambledon Road. Should the compound be located to the south, the cable route could run adjacent to Hambledon Road in a south-easterly direction. The potential utilisation of such an alignment could be tested further, albeit it is acknowledged that the landscape impacts arising are likely to be significant given the extent of hedgerows and other vegetation in the area. The Highway Authority requires further information to understand the implications of locating the compound to the north or the south of Hambledon Road.	of the existing hedgerow, provision of a vehicle crossover and new kerb to form a gated access. The gates will be set-back from the highway to prevent vehicles blocking the carriageway. At this stage the exact location of temporary access junctions within Order Limits is not confirmed as these will depend on the final alignment of the Onshore Cable Route, which will be confirmed during detailed design taking into account existing constraints. Discussions are also ongoing with Natural England with regard to the construction compound locations. The Applicant's preferred option is to locate the southern HDD compound to the north of Hambledon Road. The location of the southern HDD compound for either option would be to the south of both Kings Pond Meadows SINC and Soake Farm Meadows SINC. The Applicant is preparing a "Construction Access Standard Detail Document" to provide a layout for all construction access locations and the design criteria which will need to be met. The Applicant welcomes the views of HCC on this document in due course.
5.17	The A3 London Road is subject to a significant number of private accesses which during the construction period will be subject to access issues, night-time working and additional delay along the corridor as a result of the extensive construction programme. The route also importantly provides access to key retail areas such Asda Waterlooville store, Sainsburys and Wellington Retail Park along with local centres within Purbrook and Hambledon Parade which would all be affected by the works. The western side of the northern section of A3 London Road is also the Waterlooville Major Development Area which is under construction and seen delays previously as a result of the 2008 recession. This site is providing vital housing supply for Havant Borough Council and access works and improvement works secured through the S106 for this site are programmed to conflict with the proposed construction programme for the cable laying along this corridor. Additional delays to construction of the supporting highway works and knock on implications for construction access could lead to delays in buildout of the site and therefore have a negative impact on the surrounding community as a result of increased congestion and delayed delivery of new housing supply.	The impact of the Proposed Development has been assessed in the submitted Transport Assessment (APP-448) and Supplementary Transport Assessment ("STA", REP1-142), in agreement with the highway authority, Hampshire County Council (HCC), as stated at Section 5.4.2 of the STA. The Applicant acknowledges that there will be a level of disruption along A3 London Road during the construction of the Proposed Development. However, as set out in the Framework Traffic Management Strategy (FTMS) and FCTMP (REP1-068) and (REP1-070) submitted at Deadline 1, suitable mitigation measures have been set out in order to manage traffic flow and programme the construction works so unacceptable impacts are avoided. The "*Onshore Cable Route Construction Impacts on Access to Properties and Car Parking and Communication Strategy*" (which comprises Appendix 1 of the FTMS) also details how access to private residential access will be managed during the construction period through use of road plating outside of construction working hours and at all times to provide access for vulnerable persons or in emergencies. Details of measures to ensure on-going access to the retail areas is included in Section 6 of the FTMS as well as Section 5 of the "*Onshore Cable Route Construction Impacts on Access to Properties and Car Parking and Communication Strategy*" (Appendix 1 of the FTMS). Both the FTMS and FCTMP and the measures they propose are secured by requirement 17 and Part 5 of Schedule 13 to the dDCO (REP1-021). The Applicant will seek to work with HCC so that the delivery of the Proposed Development is co-ordinated with the delivery of the improvement works associated with the Waterlooville Major Development Area (MDA), taking into account the programme mitigations provided for within the FTMS and the need to deliver the works efficiently so as to minimise impacts. Discussions have been held between the Applicant and Grainger Plc, the developers of the West of Waterlooville site. A draft Statement of Common Ground (SoCG) has been agreed between the Applicant and Grainger Plc (REP1-115) submitted at Deadline 1. Included within Section 4.1.3 of the SoCG is an agreed statement regarding the liaison which shall occur between the Applicant and Grainger Plc with reference to the phasing of highway works required to serve the West of Waterlooville development site.

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5.18	Whilst the Environmental Assessment provides some consideration of an alternative non-highway focussed route, Hampshire County Council is yet to be convinced that the conclusions that the ES reached on this matter are fully justified. In particular, little understanding, and weight, appears to be given to temporal disturbance to the highway during construction, subsequent longer term impacts of this disruption and the impact on future planned highway schemes including: • Ladybridge Roundabout Capacity Improvements as a s106 obligation of the Waterlooville MDA planning permission and potential TCF works; • Stakes Road/Stakeshill Road capacity improvements as a s106 obligation of the Waterlooville MDA planning permission; • Milton Road/Lovedean Lane junction improvements as a result of permitted development at Woodcroft Farm secured within the s106 agreement for the development; and • Resurfacing works at the A3 corridor. There is also the ongoing potential for future transport works with long term aspirations to improve the bus provision along the A3 corridor to further support the bus 'Star' routes and improve the sustainable transport offer within the area.	Further justification of the route for the Onshore Cable Corridor is provided within the Supplementary Alternatives Chapter - Appendix 3 of the ES Addendum (REP1-152), including in respect of the utilisation of the 'Countryside Route'. The Applicant will seek to work with HCC so that the delivery of the Proposed Development is co-ordinated with the TCF works and other schemes, taking into account the programme mitigations provided for within the FTMS and the need to deliver the works efficiently so as to minimise impacts.
5.19	The Transport Assessment does not provide any justification as to why the cable must take this route, or the alternatives that have been explored and as previously noted this should be provided for clarity to all parties. There may be opportunities along the route to take the cable off the highway or at least off the main A3/B2150 corridor in either part of whole such as: • Fields running parallel with the A3 from B2177 Portsdown Hill Road to Purbrook Heath Road. • West of Waterlooville urban extension site from Purbrook Heath Road to Hambledon Road/Darnel Road junction • Fields on the south western boundary Hambledon Road to Forest Road roundabout. • Service road provisions along the main A3 and B2150 corridor which would take the route off the mainline.	Further justification of the route for the Onshore Cable Corridor is provided within the Supplementary Alternatives Chapter - Appendix 3 of the ES Addendum (REP1-152), including in respect of the utilisation of the 'Countryside Route' which included fields running parallel with the A3 and B2177 Portsdown Hill Road to Purbrook Heath Road. Further detail of consideration of the route through the West of Waterlooville MDA is provided within Chapter 2 of the ES (APP-117). The Applicant has liaised with the developer of the West of Waterlooville MDA, resulting in advice that due to the long term nature of the construction associated with the development, comprising 14 phases, they would not be able to support any infrastructure unrelated to their development that could complicate their programme, cause construction delays and also introduce uncertainty to potential buyers / occupiers of the development. Due to the proposed timing of construction of the Proposed Development, and the delivery programme for the West of Waterlooville MDA, being a strategic housing and employment allocation, routing through this area was not considered a feasible alternative to the proposed highway route. Fields on the south western side of B2150 Hambledon Road between Closewood Road and Soake Road and service roads on the northern side of this corridor are included within the Order Limits and may be used as part of the final alignment of the Onshore Cable Route when this is confirmed during detailed design. Details of traffic management options which would be used if the Onshore Cable Route uses the B2150 Hambledon Road service roads is shown in Section 6.2 of the FTMS (REP1-068).

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5.20	These opportunities should be considered by the Applicant and justification will be needed should it be considered unfeasible e.g. landscape impact. It is accepted that utilising the public highway may be considered less complicated than negotiating with individual private landowners and will likely be more contained within the existing urban landscape. However, this route will inevitably cause prolonged delay on key areas of the network and has potential ongoing implications for the Highway Authority, private developers where planning permissions rely on delivering improvements to the affected highway and other utility companies. The Highway Authority therefore requires clear justification as to why the highway is the preferred option. This is especially pertinent for the southern section of Hambledon Road and northern end of London Road (north of Ladybridge roundabout) within the development red line given that these areas are particularly heavily trafficked and there are several planned improvement schemes, making cable installation particularly challenging.	Further justification of the route for the Onshore Cable Corridor is provided within the Supplementary Alternatives Chapter - Appendix 3 of the ES Addendum (REP1-152), including in respect of the utilisation of the 'Countryside Route'. The Applicant has balanced the impacts of the works in the highway and the works not on the highway in these locations, and whilst it is noted there are impacts on traffic as a result of undertaking works in the highway, these impacts, with mitigation applied, are considered to be less impactful than the construction and permanent impacts of installing the cables off the highway in these locations. The comments that the future presence of the onshore cables has the potential for ongoing implications for the Highway Authority, private developers where planning permissions rely on delivering improvements to the affected highway and other utility companies is without any foundation. The onshore cables are akin to other utilities located in the highway. They do not present any more of a constraint than that which already exists and may be installed in the highway. It should be noted the Applicant already benefits from an interconnector licence which provides rights to install cables in the highway, evidencing the in-principle acceptability of their location in the highway. The submitted Supplementary Transport Assessment (REP1-142) has demonstrated the implications of the delivery of the works on the sections of the highway network Hampshire County Council refer to. The FCTMP (REP1-070) and FTMS (REP1-068) sets out details of the mitigation approach during construction. The Applicant will seek to work with HCC so that the delivery of the Proposed Development is co-ordinated with the works and schemes referred to, taking into account the programme mitigations provided for within the FTMS and the need to deliver the construction works efficiently so as to minimise impacts. Please refer also to our response to Para 5.17 above, which specifically considers the retail areas and planned improvement schemes around the southern section of B2150 Hambledon Road and northern end of A3 London Road.
5.21	A Transport Assessment has been submitted detailing current vehicular traffic flows on the affected network, existing sustainable modes of transport provision and a summary of the injury accident records. A review by the Highway Authority of the information submitted in relation to the existing conditions is set out within Appendix 2, along with a request for further information. In summary these are: • Extension of the injury accident study area to include all routes anticipated to experience a material increase in traffic as a result of the works; • Analysis of accident data, including clusters of accidents, within the extended study area; and • Improved presentation of accident data to enable analysis.	Further assessment of the Personal Injury Collision (PIC) data is included in Section 4 of Supplementary Transport Assessment (REP1-142) and Chapter 15 of the ES Addendum (REP1-139). This assessment supersedes the analysis contained in the Transport Assessment (APP-448) through collection of more recent data (1st October 2014 to 30th September 2019) and inclusion of all links anticipated to be impacted by traffic reassignment across the study area. Analysis of PIC data is also provided on a section by section basis, allowing for a more detailed presentation of findings across the study area. The analysis of existing accident trends within the study area has concluded that the overall safety impact on the road network within the study area would be neutral. The analysis of PIC history has not identified any sections considered sensitive in road safety terms to localised temporary increases in traffic flow during the construction phase, with mitigation as proposed in the FCTMP (REP1-070) and FTMS (REP1-068).

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5.22	• The Transport Assessment seeks to present an understanding of the potential impact on traffic, and high safety, during the construction of the cable route. A full review, and commentary on, information submitted in relation to the impact of the proposed works is included in Appendix 3. The Highway Authority does not agree with the conclusions reached within the Transport Assessment. Further information is required, summarised as: • Further information on how the monitoring of the performance of specific junctions will be provided during the construction works and clarity regarding the mitigation measures to be put in place if necessary. • Consideration of, and appropriate mitigation, to ensure there is no detrimental impact to sustainable modes of transport use. This could include a S106 agreement with the Applicant in relation possible bus service support via a service level agreement with bus operators and mitigation of the impact on cycling.	It is not appropriate for the Applicant to monitor the operation of specific junctions during the construction period. However there are Protective Provisions included within the dDCO (REP1-021) to allow unforeseen circumstances to be responded to. This is summarised in Section 2.13 of the FTMS (REP1-068) as follows: • Paragraph 10 of the protective provisions for the protection of the highway provides the ability for the highways authority to provide directions in relation to the works: ○ Where an emergency occurs or where necessary to secure the safety of the public; ○ Where works are being carried out in a manner which constitutes or likely constitutes a danger to any person or class of persons or to affect the stability or integrity of any structures or apparatus including the public highway; and ○ Where, as a consequence of unforeseen circumstances, in the reasonable opinion of the relevant highway authority any part of the works being carried out or to be carried out within the public highway are causing or are likely to cause serious disruption to traffic that will endanger the safety of the public. • Paragraph 4(2) of the protective provisions for the protection of the highway provides for any detailed traffic management strategy to be revised where necessary in the event of unforeseen circumstances. In response to the suggestion of a S106 obligation in relation to possible bus service support via a service level agreement with bus operators, the Supplementary Transport Assessment (REP1-142) Section 6 comprises a detailed bus journey times assessment, which analyses the difference between bus journey times across the study area by using a comparison of Do Minimum and the two Do Something scenarios contained within the SRTM. Overall, this assessment concludes that the works will generally have a minor impact on bus routes across the study area and where this is more pronounced, the impact will be limited to a short-time period. Furthermore, a meeting was held with First Group (First Hampshire & Dorset) on the 22nd August 2019 to discuss the Proposed Development and the potential impact to local bus services in the Portsmouth and South Hampshire area. A further meeting was held on 8th October 2020. The Minutes of this meeting have been issued to First Group for agreement and will be shared with HCC as soon as possible. At this meeting, First Group noted the anticipated construction programme but noted that the FTMS (REP1-068) appeared comprehensive and well planned. No request was made to the Applicant regarding requirements for additional services to mitigate the impacts of construction. At pre-submission an attempt was also made to consult with Stagecoach on the Proposed Development, but no response was received. Since submission, further contact has been made with a meeting arranged for Wednesday 21st October. The Applicant will share the outcomes of this meeting with HCC as soon as possible. Mitigation for cyclists can be found in section 2.9.3 of the FMTS. Cycleways will be kept open where possible, or a suitable diversion provided.
5.23	Works Programme There are significant works to the highway planned in the area and the Applicant will need to coordinate with these works. Some schemes may have	Please see the Applicant's response to Relevant Representation made by Hampshire County Council (RR-093) (Doc Ref: 7.9.4).

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	secured funding, or planning triggers, which if delayed due to unavailable road space could have wider impacts on securing sustainable development objectives. Discussions regarding programming should be proactively held with the Highway Authority, and other stakeholders, to ensure that road space conflicts are managed effectively. The existing permit scheme fulfils the Highway Authority's legal requirement to coordinate works and activities. This permit scheme complies with national legislation and has been designed to help reduce the impact of works on the highway by facilitating careful planning and the setting of works conditions. Approval of road space availability within the permit scheme, and works being subject to specific conditions, is therefore sought by the Highway Authority within the provisions of the DCO. Similarly, the Applicant should agree to use Hampshire Countryside Service Temporary Closure procedure for temporary closures and provision of alternative routes during construction that affects a right of way. Where a Temporary Closure Order under section 14 of the Highway Act needs to be secured, a suitable alternative route should be provided for the duration of the works where feasible. Temporary Closure Orders should be applied for at least 6 weeks prior to the commencement of works, while details of how to apply can be found at: http://www3.hants.gov.uk/row/making-changes/tempclosures.htm	The Applicant will seek to work with Hampshire County Council so that the delivery of the Proposed Development is co-ordinated with the works and schemes referred to, taking into account the programme mitigations provided for within the FTMS (REP1-068) and the need to deliver the works efficiently so as to minimise impacts. As is otherwise set out, the permit scheme is not be utilised as this does not cater for the need to secure programme restrictions included in the FTMS, which have undergone very careful consideration to comprehensively mitigate impacts on the highway network. The Applicant looks forward to engagement with HCC on the protective provisions in relation to highways and traffic and to understand any amendments that may be sought to these. In relation to temporary closures, the benefit of the DCO is that it provides a single consent. The Applicant will not accept a position where these matters are not dealt with in the DCO, as this would significantly undermine the benefit of it and the consideration of this project of national significance within the Planning Act 2008 regime. The Applicant is willing to discuss the approval process for such applications with HCC, noting that it will always be the case that the DCO provides the overarching powers in relation to those approvals. The Applicant has produced a Note on PRoW, Long Distance Walking Paths and Cycle Route Diversions included in Appendix 14 of the ES Addendum (REP1-145). This document provides details of anticipated diversions required for all routes identified as requiring temporary stopping up within the Access and Rights of Way Plan and Schedule 8 of the Draft DCO. The Applicant will engage further with HCC on these diversions.
5.24	It is noted that the proposed extent of the order limits gives flexibility to the siting of the cable route within it, and as such the cable's exact location within the highway is unknown and cannot be reviewed. An assessment of the existing apparatus or services within the highway has not been provided, however it is likely there will be a high volume of existing services. Investigation into the existing services should be carried out and design work undertaken and submitted to the Highway Authority for review to ensure the Onshore Cable can be laid to an appropriate depth. Investigatory trenches may be required. Clarification should be provided regarding whether diversions of existing services are proposed. Consideration should be given to the fact that existing services may have restrictions on working in close proximity, which may restrict delivery of the proposed infrastructure.	Full surveys of existing services have been carried out and the applicant is in discussions with services / asset owners to agree the necessary protective provisions. A necessary level of flexibility is provided for within the limited limits of deviation provided by the Order Limits, particularly in respect of depth so as to allow existing services to be navigated in this way where necessary. As such, it is not anticipated that there will be a need to undertake diversions of existing utilities save for in very limited instances. Information in relation to design and depth will be provided as part of the detailed approval processes provided for at requirement 6 and the protective provisions for the protection of highways and traffic to the dDCO (REP1-021), the latter of which is to be approved by HCC in relation to their road network. The Applicant looks forward to engagement on the protective provisions for the protection of highways and traffic with HCC.
5.25	In the absence of this information is it unclear if the proposed infrastructure can be delivered within the suggested timescales, if diversions of existing utilities will be required or if, in constrained locations, delivery is even possible. Further information regarding existing services and delivery of the proposed infrastructure in relation to this is therefore required at the earliest opportunity.	The Applicant is absolutely confident that the Proposed Development can be constructed within the indicative timescales having undertaken programming work to inform that the position is realistic and to test the assumptions, taking into account the programme mitigations to be provided by the FTMS (REP1-068) and in relation to other receptors, such as the winter working restriction in relation to Brent Geese, to inform the ongoing procurement tender exercise. The release of this information into the public domain would fundamentally undermine the procurement exercise and therefore it will not be released.

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		To confirm the robustness of the assumptions made in relation to the overall duration of the installation of the Onshore Cable Route the Applicant has further tested cable installation rate assumptions, as detailed with the ES Addendum (REP1-139). This exercise, which takes into account information provided by experienced cable engineers within the project team in addition to information provided by experienced third party cable installation contractors, has further evidenced the robustness of the assumptions in relation to the overall installation duration. It should be noted that the assumptions specifically take into account the need to navigate existing utilities in areas of identified heavy service congestion. Full utility searches have been conducted within the Order Limits to identify existing utilities to the best available level possible without breaking open the surface of the highway (which is not appropriate or necessary at this time). All utility plans have been discussed with the relevant owners, with work ongoing with regards to protective provisions. On detailed review of the utility data the Applicant is satisfied that the necessary limited level of flexibility included for within the Order Limits ensures that the Proposed Development is deliverable, and that it can be delivered within the indicative timescales outlined.
5.26	The Highway Authority is concerned that construction of the proposed infrastructure within the highway will significantly restrict or prevent future highway improvement schemes and the placing of other new utility infrastructure. Discussions with the Applicant confirm that future diversion of the cables, while theoretically possible, is highly likely to be prohibitively expensive and will be of an extensive nature. It is therefore imperative that the cable is laid in such a way to minimise the need for any diversion in the future. Should the Applicant be granted approval for the works sought in the submitted DCO, the Highway Authority require an indemnity to cover the potential cost of diverting the cables should this be necessary to facilitate highway works. Should an indemnity not be agreed, future improvement schemes, or works to facilitate future development, will become unviable should cable diversion be required, which may prevent future development or highway improvements to support access and travel.	While the Applicant notes the comments made, it is not clear on what basis the authority considers this could significantly restrict or prevent future highway improvement schemes and the placing of other new utility infrastructure any more so than existing utility infrastructure within the highway. The onshore cables are akin to other utilities located in the highway. They do not present any more of a constraint than that which already exists and may be installed in the highway. It should be noted the Applicant already benefits from an interconnector licence which provides rights to install cables in the highway, evidencing the in principle acceptability of their location in the highway. Further, taking into account the roads in which the Proposed Development is proposed to be installed, it is not considered there is the potential for the need to divert existing utilities within those highways to bring forward proposed future highway schemes, or to facilitate access to future development which may branch off of these roads. It would also not be necessary to divert the Proposed Development to do so once installed. The point made by HCC is without any foundation. It is also not understood on what basis it is considered an indemnity is appropriate or justified. The authority, so far as the Applicant is aware, does not have the benefit of indemnities from all other statutory undertakers who have installed utilities and who may in the future install such utilities within the highway network in Hampshire, in accordance with their statutory rights to do so. It is not understood why it is considered that the position in relation to the Proposed Development should be any different (again, noting the Applicant already benefits from such rights to install infrastructure in the highway by virtue of its interconnector licence, and no such indemnity would be applicable were those powers were relied on to install the cables).
5.27	The submission material does not include specific details of the onshore cable route alignment, depth of installation and horizontal positioning within or adjacent to the highway (carriageway, footways, cycle paths, verges) and open fields.	The position with regard to the installation of the onshore cables is that they will be installed within the limited lateral limits of deviation provided by the Order Limits, noting this level of flexibility is required to provide certainty that the Proposed Development can be delivered without impediment and the need to undertake diversions of existing utility infrastructure where related to works in the highway.

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	It is essential that all reinstatements comply with the 'Specification for the Reinstatement of Openings in Highways' and any deviations from this specification must be agreed with the County Council. Any non-compliances will need to be rectified by the Applicant at their own cost. The usual two or three year guarantee period must apply to all reinstatements. Should the reinstatement fail after the guarantee period and it is proven that the Applicant failed to reinstate the works correctly in the first place then the guarantee period is deemed to have not started and the Applicant will remain liable for the reinstatement.	It is noted that the authority has suggested that there may not be sufficient flexibility to install the cables, and yet then challenges the need to reduce that flexibility to provide a more refined cable route, which for the reasons already provided is not possible as it is would jeopardise the delivery of the Proposed Development and the significant benefits which are to be delivered with it. Indicative information regarding the depth of the installation of the onshore cable is detailed in plate 3.2 of the Environmental Statement Addendum (REP1-139). Whilst this information is indicative as it is anticipated it may be necessary to go beyond this depth in limited locations to navigate existing constraints, it is expected that for the majority of the onshore cable route the indicative installation depth is an accurate reflection of the likely depth. The applicant confirms that all reinstatement of the highway will be in accordance with 'Specification for the Reinstatement of Openings in Highways', noting that the installation of the cables in the highway is to be regulated by the New Roads and Street Works Act 1991, and that Section 70 of that Act (duty to reinstate) which requires reinstatement to be in accordance with the 'Specification for the Reinstatement of Openings in Highways' is applicable. This position has been confirmed to the authority on several previous occasions. Section 70 also provides for the statutory guarantee periods to be applicable and requires them to be complied with (with non-compliance being a criminal offence). Section 71 (materials, workmanship and standard of reinstatement) and Section 72 (powers of street authority in relation to reinstatement) are also applicable, again ensuring compliance with the relevant statutory requirements in relation to the carrying out of street works for the installation of utility infrastructure in the highway. The position with regard to reinstatement is also further detailed in the protective provisions for the protection of highways and traffic, included at Part 5 to Schedule 13 to the draft DCO (REP1-021). The Applicant looks forward to engagement on the protective provisions for the protection of highways and traffic with HCC.
5.28	The Transport Assessment states that the cable will be laid to a normal burial depth of 900mm to the top of the protection covers when situated on agricultural land and open countryside. However, no proposed depth is specified for construction within the highway. As above, a construction method statement for highway works in the vicinity of the cables, with confirmation of an increased minimum burial depth, is required to determine an acceptable construction method.	Indicative depths are detailed in plate 3.2 of the Environmental Statement Addendum (REP1-139). Whilst this information is indicative as it is anticipated it may be necessary to go beyond this depth in limited locations to navigate existing constraints, it is expected that for the majority of the onshore cable route the indicative installation depth is an accurate reflection of the likely depth. All necessary information to confirm the location of the cables and the construction methodology is specified as being required to be provided for approval in the protective provisions for the protection of highway and traffic included at Part 5 of Schedule 13 to the dDCO (REP1-021), which the authority has been in receipt of for some time but is yet to comment on.
5.29	Clarification should be provided regarding the implications of high voltage direct current cables within the highway for future 'smart technologies'. This includes the potential for in-road electric vehicle charging and vehicle infrastructure integration. The Highway Authority is keen to ensure that future installation of sustainable smart technologies are not prohibited along the route.	In-road electric vehicle charging uses inductive charging via plates or conductors embedded in the road surface or near to the road surface. The DC cables do not generate a varying EMF (other than a very small EMF caused by the low level of harmonics superimposed on the DC waveform) and therefore they would not have any effect on the charging systems. Any physical or thermal interaction between systems can be avoided by appropriate siting and is not a constraint to the delivery of such smart technologies. It is not known at this stage whether smart technology will be installed and whether it will be in the vicinity of the Proposed Development.

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		Vehicle infrastructure integration is the communication between vehicles, and between vehicles and the external road side infrastructure. Being DC, the cables will not cause any interference with any above ground communications systems, whether this be between vehicles or between vehicles and road side infrastructure.
5.30	Whilst a method statement for highway works in the vicinity of the cables, joint bays and link boxes has been provided by the Applicant, it does not include all the information required and should be updated and resubmitted for review. This should detail the required construction methodology, including the minimum required cover depth. Should the cover depth be reduced beyond the minimum in the future due to highway works, details of the required mitigation/ remedial measure (e.g. protection slab if appropriate) should be formally agreed at this stage.	Indicative depths are detailed in plate 3.2 of the Environmental Statement Addendum (REP1-139). Whilst this information is indicative as it is anticipated it may be necessary to go beyond this depth in limited locations to navigate existing constraints, it is expected that for the majority of the onshore cable route the indicative installation depth is an accurate reflection of the likely depth. Any measures to protect the cables where there is a reduced cover depth because of future highway works would need to considered at the time, taking into account the particular circumstances of the works. In any event, no foundation is provided for this theoretical risk and it is not considered likely that the established roads within which the onshore cables are located, will experience any significant reduction on their level in the future. It is also noted there are other services in the highway and all such services would be affected by any such level reduction scheme, which HCC would need to take into account when formulating any such proposals, and to treat the interconnector cables in the same way as all other appropriate infrastructure authorised by statute to be installed in the highway.
5.31	Proposed jointing bays are currently indicatively shown to be within the existing highway including within key junctions. No exact locations have been provided and there is concern regarding the maintenance liability and ongoing temporary traffic management implications of having inspection chambers within the highway. The Highway Authority therefore request that jointing bays are not located within the public highway, and not within an agreed distance of planned highway works. However, should installation within highway land be progressed, the Highway Authority require precise locations to be provided in order to understand the detailed implications of these on future highway works and maintenance. Provision of the detailed construction method for the joint bays is also required, as is a construction method statement for highway works in the vicinity of the joint bays. Information is also required on any constraints that will exist in the vicinity of the joint bays, such as a requirement for the Applicant to retain access in perpetuity. A plan showing locations of planned works within the area has been included with Appendix 6; jointing bays would be unacceptable in these locations. Discussions should be had with the Highway Authority regarding detailed locations of jointing bays if required within highway land.	Joint Bays will be positioned in verges, fields or car parks to limit any requirement for ongoing traffic management, road and footpath closures, save for where this is not feasible. Furthermore, all design details for the location of infrastructure in the highway are to be approved by the highway authority in accordance with the protective provisions for the protection of highways and traffic, such that any potential issues regarding the siting of joint bays will be discussed with HCC and resolved before approval issued. The protective provisions also require the submission and approval of the construction methodology in relation to all works in the highway, which it is appropriate to provide at that time. It is preferable to avoid the need for the DC cables to cross the highway to access a joint bay location and this will not be undertaken unless there is no other option. In any event, maintenance activities associated with onshore cables are very minimal, with cable failures rare and monitoring undertaken from the above ground link boxes and link pillars. Whilst it will be necessary for access to be available to joint bays in perpetuity, the need for any access would only be in the event of a cable failure, which as previously stated is a very rare occurrence. Monitoring is undertaken from the above ground infrastructure, being the link boxes and link pillars. It is considered all points raised by HCC in this statement are already addressed in the dDCO.
5.32	Any future construction around jointing bays within the highway would require an Approval in Principle (AiP), following the Highway Authority's approval procedure for structures as per 'Design Manual for Roads and Bridges, DMRB 1.1.1 BD2'. It is understood that maintenance access to the joint bays is proposed to be off-carriageway, located in footways or highway verges.	Joint Bays will be positioned in verges, fields or car parks to limit any requirement for ongoing traffic management, road and footpath closures, save for where this is not feasible. This is secured in the updated Onshore Outline Construction Environmental Management Plan (OOCEMP) (REP1-087) and secured by requirement 15 of the dDCO (Rep1-021). The comments regarding the AiP process and the 'Design Manual for Roads and Bridges, DMRB 1.1.1 BD2' requirements are noted. The Applicant is content to discuss how any such construction

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	This should be confirmed and should allow space for contractors to safely park and access the joint bays for maintenance.	related requirements can be captured in the protective provisions for the protection of highways and traffic to ensure they are provided for as necessary.
5.34	No reference to link boxes is made within the Transport Assessment; however, there is reference in the draft Development Consent Order Requirements (Schedule 1, paragraph 1, C). The Highway Authority requires clarification as to whether any link boxes are proposed within the highway and, if so, details of the construction methodology and implications for future highway works should be provided.	It is possible these will be located within the highway, for instance on footways. They would never be located in the carriageway for obvious reasons. However, as with joint bays, they will be positioned in verges, fields or car parks unless not feasible in the specific location required. The design and position of all such infrastructure and the construction methodology in relation to them will be agreed with HCC in accordance with the approval processes provided for by the protective provisions for the protection of highways and traffic.
5.35	The Development Consent Order must include requirements for the developer to submit detailed proposals, designs and construction methodologies and specifications for review and approval by the Highway Authority prior to commencement of each section of the works. There is a need to ensure link boxes/pillars/cabinets do not obstruct footways, cycleways or other rights of way, and do not encroach upon pedestrian or vehicle sightlines and visibility splay areas at driveways and junctions. This can be assessed and approved as part of the secured design check process. Full details of the submission requirements are provided in Appendix 4. Access to inspect the works during construction will also be required, and fees will need to be secured to cover resourcing these requirements.	The Applicant has included protective provisions for the protection of the highway and traffic within the draft DCO at Part 5 of Schedule 13 (REP1-021). These protective provisions, which clearly set out the information to be provided to the authority prior to works being undertaken, were provided to the authority some months ago. Thus far, no comments on these have been received. It is considered that these protective provisions require an adequate level of information to be provided, having purposefully been drafted to include information previously requested by the authority and taking into account the information that would be provided were the permit scheme utilised. The Applicant will in addition review Appendix 4, taking into account the context of the Proposed Development, to identify if any further information is necessary to be added to what is already required to be provided. The Applicant looks forward to discussing these protective provisions with the authority to confirm they do provide for an adequate level of information to be provided. It is possible that link boxes/pillars will be located within the highway, for instance on footways. They would never be located in the carriageway for obvious reasons. However, as with joint bays they will be positioned in verges, fields or car parks unless not feasible in the specific location required. The design and position of all such infrastructure and the construction methodology in relation to them will be agreed with HCC in accordance with the approval processes provided for by the protective provisions for the protection of highways and traffic. It is acknowledged that where they are provided on the footway etc. that it will not be acceptable for them to prevent the continued use of the highway for its existing purpose. It should be noted that link boxes/link pillars are small structures akin to infrastructure commonly located in the highway, and that a maximum of 12 of each (6 per cable circuit) may be located along the whole of the 20 km onshore cable route. The impacts of these structures will be minimal, and it is acknowledged that they will also need to be positioned sensitively. Provision is made in the protective provisions to allow for access to be provided whilst works are being carried out. The Applicant has already confirmed its willingness to enter into a PPA to cover the authority's resource costs and looks forward to discussing further with the authority, with the aim of this being in place by the end of the examination period to provide the required level of confidence to the ExA and the authority that the authority's resourcing requirements are provided for.
5.36	Confirmation of adherence to the Specification for the Reinstatement of Openings in Highways, or any local amendments including methods	The Applicant confirms that all reinstatement of the highway will be in accordance with 'Specification for the Reinstatement of Openings in Highways', noting that the installation of the cables in the

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	statements will be required. Extensive trenching along the A3 will not be acceptable due to the ongoing maintenance liability for the Highway Authority. Lane width carriageway surfacing will therefore be required for reinstatement and should be secured through the DCO. There are plans to carry out resurfacing along the corridor and therefore the Applicant is required to work with the Highway Authority to ensure appropriate delivery of these works. Any new surface along the route would be subject to section 58 of the New Roads and Street Works Act (NRSWA), protecting the surface for up to 5 years and therefore preventing any cable installation for this period. In addition, S58(A) of NRSWA will also be applied following completion of appropriate sections of the Applicants work in order to protect residents and traffic from further disruption for up to 6 months.	highway is to be regulated by the New Roads and Street Works Act 1991, and that Section 70 of that Act (duty to reinstate) which requires reinstatement to be in accordance with the 'Specification for the Reinstatement of Openings in Highways' is applicable. This position has been confirmed to the authority on several previous occasions. Section 70 also provides for the statutory guarantee periods to be applicable and requires them to be complied with (with non-compliance being a criminal offence). Section 71 (materials, workmanship and standard of reinstatement) and Section 72 (powers of street authority in relation to reinstatement) are also applicable, again ensuring compliance with the relevant statutory requirements in relation to the carrying out of street works for the installation of utility infrastructure in the highway. It also noted that the protective provisions for the protection of highways and traffic require the submission and approval of details of the proposed approach to the reinstatement of the public highway in connection with those works, including (where applicable) details of both temporary and permanent reinstatement. The need for lane width carriageway surfacing is not accepted. This request is considered at best to be opportunistic and not justified. The Applicant will comply with all statutory requirements for the reinstatement of the highway, so as to ensure the works it carries out are reinstated to the required level and subject to the relevant guarantee periods. Section 58 of the New Roads and Street Works Act 1991 relates to restrictions following works being carried out. This is not included in the DCO, and will not be, because it is necessary for the Applicant to be able to carry out works in accordance with the programme mitigations provided for within the FTMS (REP1-068) so as to ensure the works are delivered in good time whilst limiting the adverse impacts. Applying this power in the DCO would potentially prevent delivery within the indicative timescales, which we note is a concern of the authority. That section 58 of the New Roads and Street Works Act 1991 is applicable following the works to deliver the Proposed Development being carried out is the position at law. It is not necessary to include for this power in the DCO for this to be the case. This has already been explained on several occasions to the authority.
5.37	Fees will be required for design checking and inspecting access and widening S278 works. There will also be fees associated with the Highway's Authority preferred use of its permit scheme for coordination of works/ road space booking and inspection of works to ensure compliance with agreed standards and conditions. The Highway Authority's standard procedures / permit scheme secure these fees, however, if these are not followed, the required fees will be secured in the DCO. A summary of the required fees is set out below: • Design check and inspection fees for S278 works; time charge basis. • Design check of the exact cable route, site-specific cable laying methodology and review of other infrastructure (e.g. joint bays); £50,000 in total for the works is considered acceptable. • Inspection of the cable laying (including daily inspections, attendance of monthly site meetings and quarterly progress meetings); £5,000 per month over the life of the project within HCC highway is required.	Any amendments to the highway are to be carried out in accordance with the powers provided for this in the DCO, the significant benefit of which is to ensure there is not a need to obtain such agreements in connection with the works and instead providing statutory authority to do so. Article 10 to the DCO is relevant, and it is notable that this requires the works to first be approved by the relevant highway authority, therefore ensuring the relevant design processes are followed. Not following this approach will significantly undermine the benefit of obtaining the DCO and potentially frustrate the delivery of this project of national significance, which the Planning Act 2008 regime is purposefully designed to avoid. The Applicant has confirmed its willingness to enter into a PPA in relation to post-consent approvals, and has no objection to such fees being included for within the PPA, noting that any such works will most likely be included within the information already required to be provided and approved in accordance with the protective provisions for the protection of highways and traffic included for within the draft DCO. The costs set out by the authority are noted, albeit their applicability, particularly the extent of works they relate to, is not fully understood. The Applicant looks forward to discussing the PPA further with

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	• Road space booking and carriageway reinstatement inspection (using the permit scheme): charged on a per permit basis but the estimated cost is c. £17,000. o Nb. If the permit scheme is not used, road space booking and carriageway reinstatement inspection: £30,000. Any change of scope or programme of the proposed works may require amendments to the values stated above.	the authority to ensure their actual resource costs are provided for as per the position at law. As the practicalities of the actions being carried out do not differ if the permit scheme is used, it is not understood why the authority considers it appropriate to seek to penalise the Applicant for not using the permit scheme. In this regard it is noted the reason for not using this is because of the complexity provided for by the programming restrictions provided for in the FTMS (REP1-068) which are necessary to minimise impacts and co-ordinate the delivery of the works in a streamlined manner across both highway authorities where works are to be carried out. This approach is for the benefit of all parties. The Applicant therefore looks forward to engagement on this approach, noting the protective provisions and a detailed explanation of how they respond to the points raised by the authority previously was provided in July but that no response has been received.
5.38	The application currently retains a significant level of flexibility for the appointed future contractor to determine the exact location and construction method of the cable within the highway. Given the lack of information regarding the exact route of the cable and any specific construction details along each section of the corridor, there is insufficient information to enable the Highway Authority to adequately assess the impact of the proposals. This may result in sections of the cable being undeliverable along the proposed route. The likelihood of this cannot be determined through the level of information submitted to date. The Highway Authority recommend that additional information and detail is provided at this stage to ensure that unknown details do not jeopardise the delivery of the project. Should this information not be provided, it is imperative that a process for review and authorisation of the detailed construction specifics for all sections of the cable route within the highway is secured, along with inspection of the works during construction.	As stated in response to the authority's comments at paragraph 5.25, full utility searches have been conducted within the Order Limits to identify existing utilities to the best available level possible without breaking open the surface of the highway (which is not appropriate or necessary at this time), identifying a single utility owner where there is potential for a diversion. All utility plans have been discussed with the relevant owners, with work ongoing with regards to protective provisions. On detailed review of the utility data the Applicant is entirely confident that the necessary level of flexibility included for within the Order Limits ensures that the Proposed Development is deliverable, and that it can be delivered within the indicative timescales outlined. It is not agreed that the level of flexibility included for within the Order Limits is significant. A proportionate and necessary level of flexibility is provided for within the lateral limits of deviation to ensure no impediment to delivery is provided for, therefore addressing the authority's concerns regarding the scheme not being deliverable. The position put forward by the authority also appears to be conflicting, identifying there is too much flexibility, but then questioning whether the Proposed Development can be delivered within the flexibility provided (i.e. there should be more flexibility). As previously stated, the Applicant is entirely confident that the necessary level of flexibility included for within the Order Limits ensures that the Proposed Development is deliverable, and that it can be delivered within the indicative timescales outlined. The information requirements included for within the protective provisions for the protection of highways and traffic include the need for specifics of all sections of the cable route within the highway to be provided and approved. They also provide for the inspection of the works during construction. It is disappointing HCC has chosen not engage in relation to these, given they were purposefully produced to respond the comments raised previously, which are being raised again now, and which have already been addressed.
5.39	Should the Examining Authority consider that detailed further information is not required at this stage, it is imperative that a process for review and authorisation of the detailed construction specifics for all sections of the cable route within the highway is secured, along with a programme for the inspection of the works during construction. This should include details of the siting, positioning, construction and subsequent maintenance of the onshore cables, jointing bays, link boxes, pillars and cabinets.	The information requested to be secured is already provided for within the protective provisions for the protection of highways and traffic included at Part 5 of Schedule 13 to the draft DCO (REP-021), previously issued to the authority for comment some months ago. It is disappointing HCC has chosen not engage in relation to these, given they were purposefully produced to respond the comments raised previously, which are being raised again now, and which have already been addressed.

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		The Applicant looks forward to discussing these with the authority in due course to confirm they are adequate to provide the information required by the highway authority to ensure it is able to comply with its statutory function.
5.40	Consideration must also be given by the Applicant regarding future maintenance of the cables and the reinstatement of the carriageway bearing in mind that liability for any reinstatement could be in perpetuity. It is also unclear how the Applicant will register and be permitted to undertake future reinstatement and defect repairs including being eligible to apply and pay for works permits. This is a critical matter to be addressed by the project team and should mirror or adopt existing processes provided within the New Roads and Street Works Act 1991.	The New Roads and Street Works Act 1991 is applicable to the Proposed Development by virtue of the DCO (see Articles 11 and 12) for the period of construction and operation. Reinstatement is dealt with by these powers, and is also addressed in the protective provisions for the protection of highway and traffic. All of these comments have already been addressed and the position requested provided for. The Applicant looks forward to HCC acknowledging the information previously provided to them.
5.41	An assessment of trees to be impacted has been undertaken to BD 58372012 standard. However, HCC cannot be sure whether all trees that are likely to be affected have been assessed. This uncertainty is due to the powers being sought within the DCO which suggests that trees outside the order limits may also be impacted. There are also trees within the report which are the property of Hampshire County Council and the issue of compensation for the loss of irreplaceable assets has not been addressed.	The assessment of trees has been refined following revision to the order limits. Details can be found in the updated OOCEMP (REP1-087) and OLBS (REP1-034) provided at Deadline 1. A revised Tree survey schedule and tree constraints plan can be found at 7.4.1.10 Appendix 10, which was also submitted at Deadline 1. The powers in the DCO in relation to trees (and generally) are authorising powers. The works to be carried out pursuant to those authorising powers is controlled by the approvals required to be obtained in accordance with the Requirements to the DCO and with compliance with is secured.
5.42	Where Hampshire County Council owned trees have to be removed for example from verges, compensation or mitigation (or a combination of the two) will be required to equal the capital value of the asset lost. This is to be calculated using the industry recognised CAVAT (Capital Asset Valuation for Amenity Trees) system and workings for this valuation should be included within the submission. There is currently no set mechanism for compensating loss set out within the application.	The Arboriculture Method statements required as part of the OOCEMP (REP1-087) will include consideration of replacement trees and assessment of trees identified for removal. This is secured by Requirement 15(2)(c)(iv) of the dDCO (REP1-021) which will be submitted to and approved by the relevant planning authority.
5.43	The Tree Report (paragraph 1.5.4) provides a specification for root cutting and adjustment of root protection areas. While this is not completely untenable, the specification does not include any limits to this prescription. As such, there are concerns that this could be implemented so as to leave trees dangerously unstable. Any work of this kind to HCC trees, which are on or close to the highway, should require agreement from HCC.	As detailed in the Updated OOCEMP (REP1-087) submitted at deadline 1, works will be controlled through appropriate Arboriculture Method Statements and where required, works will be subject to watching brief by a suitably trained and experienced Arboriculture professional. Trees will not be left in an unstable condition post works. All works to trees will be approved by the relevant authority before being undertaken.
5.44	The absence of Tree Preservation Orders on public trees is no indication of their worth; publicly owned trees are rarely protected as they are already managed as appreciating public assets for safety. The preferred option is always to retain existing tree cover where this has a reasonable 'safe useful life expectancy'. Further details of a suggested hierarchy of approach to addressing highway trees in this context is set out in Appendix 1.	The Assessment of trees has been undertaken in accordance with British Standard 5837:2012 "Trees in relation to design demolition and construction – recommendations" Table 1 "Cascade chart for tree quality assessment". The assessment takes account of the trees' physiological and structural condition as found on the day of assessment. A revised Tree Survey Schedule and Tree Constraints Plan can be found at Appendix 10 to the First Written Question Responses (REP1-101), which was also submitted at Deadline 1.The applicant has sought to minimise impact to all trees, in keeping with Table 1 of the Standard, the applicant has focused its avoidance on higher retention value trees. The Arboriculture Method Statements required as part of the OOCEMP

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		(REP1-087) will include consideration of tree protection measures and site specific working practices to ensure the long term viability of retained trees. Detailed Arboriculture Method Statements will be prepared in consultation with the relevant local planning authority.
5.45	Part of the proposed route requires the crossing of a culvert under the A3 south of Ladybridge Roundabout. The Highway Authority requires construction details of this to be provided in order to be able to assess the impact on the culvert. No information has been provided within the application to demonstrate to the satisfaction of the Highway Authority that these works are deliverable, taking into account the likely constraints. Such information should be provided at this stage. The Highway Authority anticipates the need for a subsequent Approval in Principle (AIP).	The culvert crossing under the A3 south of Ladybridge Roundabout has been reviewed and is feasible with no known impediments to construction at present. The Applicant will further discuss the culvert with the authority to confirm this. Details of actual construction will be provided post-consent, which will be subject to approval by HCC in accordance with the protective provisions for highways and traffic, and more generally HCC will be involved in the approval of any necessary watercourse related consents in their capacity as the Lead Local Flood Authority. Comments regarding the need or AiP are noted. As stated above, the Applicant will review the protective provisions for the protection of highways and traffic which detail the design information required and are amenable to including all information which is necessary to be provided to HCC.
5.47	Vehicular access to the site is proposed at the Day Lane/ Broadway Lane junction. Prior to the submission of the DCO, the Highway Authority requested further details of the site access to confirm it meets the required highway design standards and allows for safe and efficient use of the highway network. This requested additional information has yet to be received and accordingly the acceptability of the proposed site access cannot be assessed. Appendix 5 provides full details of the further information required.	Further information on the proposed access junction is included within Section 3 and Appendix C of the Supplementary Transport Assessment (REP1-142). This shows that an access to the Converter Station can be satisfactorily provided, relative to the conditions of the highway and the forecast vehicular usage. The Applicant will discuss this information further with HCC to confirm they are content with it, and it is noted that HCC will be required to approve the design of this access in due course also.
5.48	It is noted that Broadway Lane is derestricted and as such visibility splays at the proposed new vehicular access would normally be sought at a 'distance of 4.5m back from the channel of Broadway Lane. However, the majority of total vehicular movements are expected to be during the construction period of the converter station where all necessary signing can be secured. Vehicular movements following construction are likely to be infrequent. Therefore, securing an 'x' distance of 2.4m is considered appropriate for both the construction period and subsequent routine access for future operations and maintenance of the converter station.	Further information on the proposed access junction is included within Section 3 and Appendix C of the Supplementary Transport Assessment (REP1-142). This shows that an access to the Converter Station can be satisfactorily provided, relative to the conditions of the highway and the forecast vehicular usage. The Applicant will discuss this information further with HCC to confirm they are content with it, and it is noted that HCC will be required to approve the design of this access in due course also.
5.49	Insufficient detail has been provided to date to confirm that the principle of the access is acceptable and for Hampshire County Council properly to inform the Examining Authority of the likely impacts of the access. It should be noted that a requirement within the DCO will need to secure Hampshire County Council's standard Section 278 process. This will ensure that the works are constructed to an adoptable standard and are carried out in line with the Highway Authority's procedures, should the application be permitted. This process includes the requirement for detailed engineering drawings to be provided of the proposals for review and approval. Should a requirement to complete the County Council's standard Section 278 process not be included,	Further information on the proposed access junction is included within Section 3 and Appendix C of the Supplementary Transport Assessment (REP1-142).This shows that an access to the Converter Station can be satisfactorily provided, relative to the conditions of the highway and the forecast vehicular usage. The Applicant will discuss this information further with HCC to confirm they are content with it, and it is noted that HCC will be required to approve the design of this access in due course also. Article 10 provides the power to alter the layout etc. of streets. To not provide for this in the DCO and require a separate process of agreement to be followed would fundamentally undermine the benefit of the DCO and delivery of the Proposed Development. The Applicant will discuss information requirements and approvals processes for accesses with the authority, and it is

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	more detailed requirements within the DCO will be necessary to ensure the design and construction of the site access is acceptable.	considered where necessary adequate provisions can be included in the protective provisions for highways and traffic to ensure the information to be provided in relation design and construction of the site access is acceptable. Albeit, it is noted this information may be better contained at a revised Requirement 10 (Highway Accesses).
5.50	A breakdown of average weekday vehicular flows, including the number of east/west movements, the percentage of HGV movements and the average speed of vehicles have been provided by the Applicant. However, the movements of HGVs are an aggregation of the west/east movements. Precise numbers should be provided to understand the overall level of HGV movements when compared to the two-way flow.	Further information on the number of construction traffic movements is provided in with Table 10, Section 3 of Supplementary Transport Assessment (REP1-142). This provides details of estimated daily HGV, LGV and construction worker traffic movements for construction of the Converter Station and in connection with the installation of the Onshore Cable Route. For clarity, these are provided as both one-way and two-way traffic movements
5.51	Drawing No. EN02022-2.7-LAY-Sheet3.01 shows the proposed internal layout for the converter station site during construction. This includes an internal road length of 1200 metres with an indicative width of 7.3metres. Details should be provided to ensure that the proposed access road is suitable for construction traffic. This includes details of vehicle tracking (in particular showing two HGV's passing and the abnormal loads vehicle for the delivery of the transformers), speed limit information and a definitive proposed alignment for the route. Vehicle tracking drawings will also be required for HGV's turning within the convertor station compound, as well as parking details for future operations and maintenance.	The access road has been designed to maximum parameters based on National Grid requirements and specifications for transportation of equipment to a high voltage station. This is a permanent road, provided for construction and to be retained following. The Applicant does not agree that tracking is required of the internal access road, or that this matter is within the jurisdiction of HCC, as it does not relate to the highway.
5.53	Work to de-commission the converter station is anticipated in a minimum of 40 years. This is assumed to have the same level of construction traffic trip generation as the converter station construction phase. A CTMP (or equivalent) for these works will be required by the Highway Authority for approval ahead of when these works are planned, in order to assess a suitable access strategy at the time. This should be appropriately secured within the DCO requirements. Concerns raised relating to the impact of the construction phase will also be relevant for the decommissioning phase. If appropriate protection cannot be achieved through the DCO for this decommissioning phase, clarity should be provided on the limits of the DCO powers in this regard, and the need for appropriate permissions to be secured from the Highway Authority.	The powers in the dDCO (REP1-021) provide for the construction and operation of the Proposed Development. The DCO will not permit decommissioning, as it is not possible to provide for approvals in relation to works to be undertaken in circa 50 years' time. As is explained in the application documentation, consents for decommissioning will be sought at the time and obtained in accordance with the relevant requirements in effect at that time. Nothing in the DCO disapplies anything that may be required in connection with decommissioning at that time.
5.55	On a general note, the Highway Authority sought confirmation during the PEIR consultation that access to individual properties along the A3 London Road would be retained during construction of the cable route. However, the Transport Assessment does not provide details regarding access to these individual properties. This information should therefore be provided, especially considering the unknown presence of those with mobility issues and likely absence of alternative appropriate on or off-road parking.	Included in Appendix 1 of the FTMS (REP1-068) is the Onshore Cable Route Construction Impacts on Access to Properties and Car Parking and Communication Strategy. This provides specific consideration of the effects of construction of the Onshore Cable Route on parking and driveway access for residential properties, businesses and car parks located within or immediately adjacent to the Onshore Cable Corridor. As stated within this document, residential and business access will be maintained wherever possible albeit with different traffic management approaches applied depending upon the location as follows:

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		Where single lane closures are required to facilitate construction on A3 London Road, vehicular access to residential properties be unavailable during construction working hours except for emergencies or to provide access to vulnerable persons. Outside of working hours access will be provided through the provision of road plates which will be used to bridge the trench. In all cases, properties will be impacted for 1-2 weeks only as a result of construction of the Onshore Cable Route being completed in 100 m sections. Where road closures are required vehicle access will be unavailable for the entirety of the road closure period, except for emergencies. Pedestrian and cycle access will however be maintained at all times. Sections 5.14 and 5.15 of this Strategy discuss the impacts, alternatives available and residual impacts on properties and parking on A3 London Road. In summary, for many properties the residual impacts are described as 'Negligible' due to limited daytime demand (when driveway access in unavailable), available alternatives and road-plating of driveway access outside of construction working hours.
5.56	A plan showing the highway boundary overlaying the order limit should be provided to enable a clear understanding of the highway land affected. 17 This can be obtained from HCC's Asset Information Team assetinformation@hants.gov.uk	Where the Onshore Cable Corridor follows the public highway the Order Limits (APP-154) have been aligned with highway boundary information obtained from HCC prior to submission of the DCO application in 2019. This information is sufficient to provide the clarity required by HCC
5.57	There are several planned highway works within the area, primarily as a result of the ongoing build out of the West of Waterlooville urban extension site, along with other traffic management and safety engineering programmes. This includes a significant improvement scheme planned at Ladybridge Roundabout. In addition, Portsmouth Water and Southern Water are planning to create a new reservoir at Havant Thicket with significant associated construction traffic movements arising. The programme dates for these works are broadly consistent with those proposed for project subject of this proposed DCO. Consideration must be given to committed schemes and the requirements under the relevant planning permissions (and/or Local Plan allocations) for the works to be delivered within specified timescales. The Highway Authority will need to be satisfied that the proposed works can be delivered without prejudicing these committed schemes. Compliance with Hampshire County Council's permit scheme would aid in the coordination of the Applicant's scheme with others in the area. Full details of the planned highway works can be found in Appendix 6. Portsmouth Water and Southern Water will need to be contacted for details of the Havant Thicket project.	The Applicant will seek to work with Hampshire County Council so that the delivery of the Proposed Development is co-ordinated with the works and schemes referred to, taking into account the programme mitigations provided for within the FTMS and the need to deliver the works efficiently so as to minimise impacts. It is noted that the proposed new reservoir at Havant Thicket is not a committed scheme. We trust HCC are raising similar points in relation to that proposed development to ensure it does not frustrate the Proposed Development, in accordance with their statutory duties to do so. As detailed in the Transport Assessment and the Supplementary Transport Assessment, the SRTM modelling takes account of committed developments in line with DfT Circular 02/2013 "*The Strategic Road Network and the Delivery of Sustainable Development*". As the new reservoir at Havant Thicket is not committed and is at an early stage, this would not have been included in this assessment. The Applicant however notes that HGV construction traffic associated with Havant Thicket reservoir would only interact with HGV construction traffic associated with the Proposed Development at A3(M) Junction 2 and only outside of the AM and PM peak periods due to the HGV routing and movement restriction contained within the FCTMP (REP1-070). The interaction of such vehicle movements will therefore have a negligible impact on the operation of this junction. Please see the Applicant's response to Relevant Representation made by HCC (RR-093) (REP1-160), which summarises how the Applicant considers that appropriate mitigation measures have been identified, as set out in the various documents listed in that response, and that the Applicant will continue to work with HCC in order to seek to agree final details. The Applicant is fully committed to following necessary process, however it is the case that to ensure the delivery of the Proposed Development within good time and minimising adverse impacts

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		a more bespoke approach cognisant of and ensuring compliance with the FTMS (REP1-068) is required. For this clear and compelling reason, the permit scheme is not to be used.
5.58	The proposed development must be coordinated with the other planned works on the network in order to avoid undue disruption for users of the network, and to ensure that the planning requirements of local developments are complied with. There is an increasing importance being placed at a national and local level on improving the operation of the local road network and reducing congestion, thereby improving air quality and supporting non-car based sustainable modes of travel.	The Applicant will seek to work with HCC so that the delivery of the Proposed is co-ordinated with the works and schemes referred to, taking into account the programme mitigations provided for within the FTMS and the need to deliver the works efficiently so as to minimise impacts. The mitigation measures from the OOCEMP (REP1-087) include that communication should be maintained with all major developments within 500 m of the Proposed Development in order to coordinate activities and reduce dust impacts. The overall temporary air quality impacts from traffic management during construction were assessed to be negligible in the Air Quality Assessment (Chapter 23 Table 23.116, REP1-033). There are no permanent air quality impacts from traffic emissions.
5.59	The Framework Construction Traffic Management Plan included as Appendix F of the Transport Assessment presents an overarching plan for the management of construction traffic and site operations across the extent of the delivery of the onshore components, including construction of the converter station and laying of the cables. It is proposed that individual Construction Traffic Management Plans are provided to each contractor with further details relating to their work site locations. It should be secured within the Development Consent Order that these are agreed with the Highway Authority prior to construction commencing on each section.	The completion of individual Construction Traffic Management Plans is secured by Requirement 17 of the dDCO (REP1-021), which states that: "No phase of the authorised development landwards of MHWS may commence until a construction traffic management plan (in accordance with the Framework Construction Traffic Management Plan) relating to that phase has been submitted to and approved by the relevant highway authority."
5.60	Insufficient analysis of the suitability of the route to the site has been undertaken by the Applicant. The construction phase for the converter station is proposed to be a 2.5-year programme and therefore the likely impact of additional vehicle movements is considered to be significant. Lovedean Lane is a predominantly residential road and Day Lane is a rural lane with a width unable to accommodate two-way Heavy Goods Vehicle flows. Further analysis is therefore required as set out in the Constraints and Issues section below.	Further information on the construction access strategy for Day Lane is included within Section 3 of the Supplementary Transport Assessment (REP1-142) and FCTMP (REP1-071). Lovedean Lane has been assessed within the Transport Assessment (APP-448) and ES Chapter 22 (APP-137). The impacts of the additional vehicle movements have been fully assessed and appropriate mitigations and controls provided for. The Applicant looks forward to discussing this further information with HCC to confirm the adequacy of the measures proposed.
5.61	Furthermore, the proposed development is expected, at any one time, to have a maximum of 150 construction workers at the converter station site, plus 50-60 workers required for the construction of the cable route (initially reporting to the primary compound at the converter station site), in addition to site deliveries. This is likely to generate significant additional movements in and around Lovedean, however the forecast number of daily movements and distribution of all vehicles (including Heavy Goods Vehicles) has not been set out clearly within the Transport Assessment. This information should be provided.	Further information on the number of construction traffic movements is provided in Table 10, Section 3 of Supplementary Transport Assessment (REP1-142). This provides details of estimated HGV, LGV and construction worker traffic movements for construction of the Converter Station and Onshore Cable Route. The level of vehicular activity associated with worker travel patterns will be further reduced in accordance with the controls provided for in the Framework Construction Worker Travel Plan (Appendix 6 of the FCTMP (REP1-071) which provides a cap on the availability of worker car parking permits on site.

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		This is set out in Section 7 of the Framework Construction Worker Travel Plan and proposes that, as an average across the work force, car park permits will be limited to one permit per 1.5 workers. The impacts of the additional vehicle movements have been fully assessed and appropriate mitigations and controls provided for. The Applicant looks forward to discussing this further information with HCC to confirm the adequacy of the measures proposed.
5.64	Public communication and dealing with public enquiries are an important element of the proposals. The Framework Construction Traffic Management Plan sets out that telephone numbers would be provided for signage; further details regarding staffing and operation of these lines is required. In addition, a website is proposed to be provided by the Applicant. Further details of the content and management of this website are required. The Highway Authority will also require details of a dedicated AQUIND communication liaison officer. Approval of road space may also be dependent on localised liaison to ensure residents and motorists are aware of upcoming works.	Further details of the construction period communication strategy are provided in the Onshore Cable Route Construction Impacts on Access to Properties and Car Parking and Communication Strategy at Appendix 1 of the FTMS (REP1-068). The Applicant welcomes HCC's views on the proposals contained within this document.
5.65 - 5.66	The Highway Authority has concerns regarding the proposed intensification of vehicular use of Day Lane. Tracking has been provided demonstrating that a car cannot pass an HGV at all points on Day Lane. Therefore an assessment of sufficient passing places and forward visibility should be provided to demonstrate that Day Lane can operate safely and without restrictions on private cars. Further details of the proposed shuttle system should be provided with associated tracking drawings. Furthermore, specific details of how HGV traffic will be controlled to stop two HGVs meeting on Day Lane should be provided and secured. It is considered prudent to implement a system where the haul road could be used as a holding area and in advance of any HGV travelling west along Day Lane. A banksman would be required to stop any HGV traffic traveling east along Day Lane and a delivery management system put in place to reduce this occurrence. This is the system successfully employed on a similar section of highway network during construction of the IFA2 interconnector. The Highway Authority has provided full detailed comments in Appendix 7, which set out the further information required in relation to the proposed Framework Construction Traffic Management Plan along with all details regarding the full extent of the Highway Authorities concerns.	Further information on the proposed strategy for control of HGVs along Day Lane is contained in section 3.4 of the Supplementary Transport Assessment (REP1-142) and Section 6.2 of the FCTMP (REP1-071). The impacts of the additional vehicle movements have been fully assessed and appropriate mitigations and controls provided for. The Applicant looks forward to discussing this further information with HCC to confirm the adequacy of the measures proposed.
5.67	The Highway Authority does not support the compulsory acquisition of the highway subsoil, particularly that which is in public ownership. Such control is not considered to be necessary given the proposed status of the Applicant as a statutory undertaker. There is very little information or evidence set out by the Applicant to justify this approach, or to explain why no compensatory mitigation is provided for.	The Applicant has since discussed this matter further with HCC, confirming that where cables are installed in the Highway, CPO is not applicable and they will be installed pursuant to statutory authority in accordance with the NRSWA 1991, as applied by Articles 11 and 12 of the dDCO (REP1-021).

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		Further information regarding the position in relation to the acquisition of the subsoil beneath the vertical plane which forms the highway, including in relation to the necessity of the approach and the justification for this is provided in the Highway Subsoil Acquisition position Statement (REP1-131)
5.68	The Highway Authority is concerned that the proposed change in ownership could potentially inappropriately constrain the Highway Authority from operating or altering said highway in any such way as is required in the future. There is also concern that other statutory undertakers, and potentially also residents, who have apparatus already in-situ may be impeded from altering or maintaining said apparatus in future. This includes potential 'way-leave' considerations.	The Applicant has since discussed this matter further with HCC, confirming that where cables are installed in the Highway, CPO is not applicable and they will be installed pursuant to statutory authority in accordance with the NRSWA 1991, as applied by Articles 11 and 12 of the dDCO (REP1-021). As the Applicant will have no ownership rights over the highway, where the infrastructure is to be installed pursuant to statutory authority in accordance with the NRSWA 1991, as applied by Articles 11 and 12 of the dDCO, any concerns regarding the ownership of this land are without foundation. Further information regarding the position in relation to the acquisition of the subsoil beneath the vertical plane which forms the highway, including in relation to the necessity of the approach and the justification for this is provided in the Highway Subsoil Acquisition position Statement (REP1-131).
5.69	The Highway Authority require additional information in order to fully assess the application, which should be covered through a specific Transport Assessment and Construction Traffic Management Plans. Fundamentally the Highway Authority require further clarification and justification within the submitted material as to the discounting of suitable alternatives to the utilisation of the A3 and B2150 for cable laying. This is in order to demonstrate clearly that the likely prolonged delay and disruption to the general public arising from utilising this route can be considered a necessity for delivery of this project. The Highway Authority will require appropriate mitigation measures to offset the impacts of the development. This includes ensuring all highway users, residents, nearby development sites, future highway improvement schemes and businesses are not unduly affected by the proposed works.	Further justification of the route for the Onshore Cable Corridor is provided within Supplementary Alternatives Chapter - Appendix 3 of the ES Addendum (REP1-152), including in respect of the utilisation of the 'Countryside Route' and the reasons why this alternative was not selected.
5.70	Finally, without further information provided by the Applicant to justify, the proposed compulsory acquisition of the highway is not supported at this time.	The Applicant confirms it is not, and never has, sought to include powers of compulsory purchase over the highway. This would not be appropriate. Installation in the highway is to be pursuant to statutory authority in accordance with the NRSWA 1991, as applied by Articles 11 and 12 of the dDCO. The Applicant is discussing this matter further with HCC to confirm the position and provide any further necessary comfort required so as to confirm the position. Where amendments to the DCO are necessary, these will be made.
Flood and Water Management		
6.2	The hydrogeological characteristics of the Converter Station Area are extremely sensitive. The site is within the Bedhampton and Havant springs which has significant karstic features. This means that any water infiltrating to the ground within the chalk bedrock, north of Horndean, has direct linkage with the aquifer which provides much of the drinking water for Portsmouth and	The sensitive hydrogeological nature of the area and karst dissolution features have been taken into consideration in the assessment undertaken. This includes the Supplementary Karst Report (REP1-156), the ES Addendum for Chapter 19 Groundwater (REP1-139), the OOCEMP (REP1-087) and secured within which all contain mitigation measures for dealing with issues related to the sensitive

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	the surrounding areas. The karstic elements of this area indicate that there is a high likelihood of infiltration forming stream sinks and dissolution features	nature of the area in particular related to the Source Protection Zone 1 (abstractions at Havant and Bedhampton Springs). The Applicant has liaised closely with Portsmouth Water and the Environment Agency to agree effective mitigation measures. Additionally, Portsmouth Water and the Environment Agency have asked for a detailed Generic Method Statement (and Communications Plan) for dealing with unknown karst dissolution features during the site works, which is currently being produced. Portsmouth Water and the Environment Agency will be consulted as the design progresses, in particular regarding the Contractor's method statement. One of the treatment steps for the runoff water prior to discharge to the ground is to pass the water through a chalk gravel. This will mitigate the risk of dissolving the chalk bedrock at the soakaway location. This mitigation is secured in the Surface Water Drainage and Aquifer Contamination Mitigation Strategy. The Applicant has agreed to discuss matters relating to flooding with HCC following receipt of the comments on flooding matters and on the dDCO in relation to these matters. It is hoped this further meeting will take place before Deadline 3 to allow an updated position to be included in the SoCG with HCC.
6.3	Groundwater flooding is often a high risk with a chalk aquifer and this type of flooding is known to occur on regular basis in Denmead, Hambledon and other areas in the vicinity. The water table can fluctuate up to 30m so it is critical to understand the depth at the site location before the risk can be fully assessed, particularly as this type of flooding can last up to 3 months.	Risks related to groundwater flooding have been considered within the Environmental Statement Chapter 19 Groundwater(APP-134). For all areas where groundwater flooding is anticipated, which includes Denmead and Hambledon, appropriate mitigation measures are detailed within the chapter and the OOCEMP (REP1-087) and secured within Requirement 12 of the dDCO (REP1-021). The available groundwater level data, recorded at EA observation boreholes, has been presented in the Supplementary Karst Report. The review of groundwater level data is an ongoing process into the construction stage, as discussed with the Environment Agency and Portsmouth Water.
6.4	Although the information provided is very high level, the submitted Flood Risk Assessment identifies that Sustainable Drainage Systems (SuDS) features will be included to manage the 1:100 + 40% climate change event.	The submitted Flood Risk Assessment is considered to be wholly adequate. The position set out in the assessment aligns with the details provided within the Surface Water and Aquifer Contamination Mitigation Strategy (APP-360), which has since been updated and submitted by the Applicant as Appendix 7 – Surface Water Drainage and Aquifer Contamination Mitigation Strategy to the OOCEMP (REP1-087). The Applicant has agreed to discuss matters relating to flooding with HCC following receipt of the comments on flooding matters and on the dDCO in relation to these matters. It is hoped this further meeting will take place before Deadline 3 to allow an updated position to be included in the SoCG with HCC.
6.5	It is proposed to use infiltration features to manage surface water although insufficient information on infiltration rates has been provided in the submitted material to date.	The current basin design is based on an assumed discharge rate of 3.4l/s. This discharge rate was calculated from 2l/s/ha of the preliminary impermeable area as advised in the HR Wallingford Greenfield runoff estimation tool (UKSuDS 2018). The detailed design will be carried out based on the outcome of an infiltration survey and to suit the project specific site layout. Following completion of the design, if necessary, adjustment to the current design will be undertaken as described in para 5.11.1.8 of Appendix 7 – Surface Water Drainage and Aquifer Contamination Mitigation Strategy to the OOCEMP (REP1-087).

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6.6	This includes proposals for the converter station where it proposed that the works would be drained by attenuation ponds and infiltration. However, the infiltration rate used for initial design is not stated.	Refer to para 5.11.1.6 and 5.11.1.8 in the Environmental Statement – Volume 3 - Appendix 3.6 - Surface Water Drainage and Aquifer Contamination Mitigation Strategy for the assumed infiltration rate that was used for the initial surface water drainage design. This document has now been revised and issued as Appendix 7 – Surface Water Drainage and Aquifer Contamination Mitigation Strategy of the OOCEMP (REP1-087) as part of Deadline 1 submission.
6.7	No depth to groundwater is identified and given the known risk of groundwater flooding to the south, this is potentially a significant risk. The depth to groundwater should be confirmed and the unsaturated zone assessed. This is acknowledged in doc 6.3.3.6 – Appendix 3.6 Surface Water Drainage and Aquifer Contamination Mitigation Strategy.	Risks related to groundwater flooding have been considered within the Environmental Statement Chapter 19 Groundwater (APP-134). For all areas where groundwater flooding is anticipated, which includes Denmead and Hambledon, appropriate mitigation measures are detailed within the chapter. They are secured within the revised Onshore OCEMP, in paragraphs 5.7.1.4 (bullet point 16), 6.4.3.1, 6.4.3.2, 6.2.6.4 and 6.2.6.11. The available groundwater level data, recorded at EA observation boreholes, has been presented in the Supplementary Karst Report. The review of groundwater level data is an ongoing process into the construction stage, as discussed with the Environment Agency and Portsmouth Water.
6.8	There is commentary in the submitted material regarding groundwater levels. However, this was based on a monitoring well located around 1km from the order limits. This is considered too far away to be used for design purposes and onsite monitoring should be provided in those locations that infiltration drainage is proposed.	Infiltration drainage is proposed only at the Converter Station (Section 1). In the Supplementary Karst Report (REP1-156) Paragraph 1.5.2.1, it is stated that the potentiometric surface (groundwater level) of the Chalk aquifer is 40 mAOD (Approx. 40 mbgl). This is the level given on the Hydrogeological Map of Hampshire and the Isle of Wight (Institute of Geological Sciences, Southern Water Authority, 1979). The water levels presented are based on water level data collected in October 1973, being the most recent available data. The long term groundwater level data also presented in the Supplementary Karst Report show that the seasonal variation in water levels in boreholes located approx. 1km south of the Converter Station (e.g. Little Denmead) is at most 15 m. This range is unlikely to be much higher at the Converter Station. Therefore, even if 40 mAOD (40 mBGL) represents a low water level at the Converter Station, the expected high water level would be in the order of 55 mAOD or 25 mBGL (i.e. substantially below ground level). None of the boreholes which were drilled in the Ground Investigations at the Converter Station encountered groundwater. Some of these were drilled to >30 m depth. It was not possible to use these boreholes as groundwater monitoring locations as Portsmouth Water raised concerns about them being installed and acting as potential contaminant pathways and in relation to the potential turbidity created during drilling. There is no concern about shallow groundwater levels impacting on the proposed drainage design (infiltration) at the Converter Station.
6.9	The submitted material assumes that infiltration rates through the existing geology (underlying the infiltration drains) will be sufficient to discharge runoff from events up to and including a 100-year return period plus 40% climate change, with additional surface water storage provided within the infiltration drains. In addition, the application assumes that the maximum groundwater levels are at least 1m below the base of the infiltration drains. Site specific	The applicant has scheduled for an infiltration survey to be undertaken in November to confirm the infiltration rate. The outcome of the survey will be communicated to and discussed with HCC in due course.

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	infiltration testing will need to be undertaken and this requirement should be included within the DCO.	
6.10	Although there is potential to provide additional water storage within the converter station site, no calculations have been provided to show the level of water storage required or the potential alternative outfall.	The design principles as set out in Environmental Statement – Volume 3- Appendix 3.6- Surface Water Drainage and Aquifer Contamination Mitigation Strategy was discussed and agreed with Portsmouth Water, the Environment Agency and HCC. This document has now been revised and issued as Appendix 7 – Surface Water Drainage and Aquifer Contamination Mitigation Strategy of the OOCEMP(REP1-087) as part of Deadline 1 submission. Gravel areas located within the Converter Station and external to buildings will receive direct rainfall and runoff from roads and AC yards excluding any runoff from the oily water areas. Therefore, the gravel areas will be implemented as infiltration drains. The depth of the granular drainage layer will be dependent on the final site layout, type and porosity of the gravel and the infiltration rates to be determined based on the result of the infiltration survey. The current design is based on a minimum thickness of 300mm of a suitable treatment filter media. The confirmation of the depth of granular drainage layer within Converter Station will be provided at detailed design stage following completion of the hydraulic modelling which, will take account of chalk and filter media infiltration rates and maximum groundwater levels. In the event that this demonstrates a need for additional surface water storage, underdrains can be installed at the base of the gravel areas to collect and convey surface water to the detention basis. Refer to para 1.6 of the Appendix 7 – Surface Water Drainage and Aquifer Contamination Mitigation Strategy of the OOCEMP for the current basin design volume based for an event with a 1:100 year return period plus 40% Climate Change and a discharge rate of 3.4 l/s subject to the outcome of the infiltration survey. The information will be submitted to statutory authorities for review and approval prior to the commencement of the construction in accordance with the OOCEMP and required design approvals in accordance with requirement 6 to the decor (REP1-021).
6.11	Some figures have been provided based on brief, high-level water storage assessments, but the outputs and evidence base have not been included. This is particularly important to get an understanding of runoff rates pre / post development. Further details of how the temporary car park for 150 vehicles has been taken into account are also sought.	Refer to para 5.11.1.6 of Appendix 7 – Surface Water Drainage and Aquifer Contamination Mitigation Strategy of the OOCEMP for the discharge rate (REP1-087)calculated from 2l/s/ha of preliminary impermeable area generating the runoff, as advised within the HR Wallingford Greenfield Runoff Rate Estimation Tool (UKSuDS, 2018) for the current drainage strategy. The detailed design will be carried out based on the outcome of the infiltration survey and to suit the project specific site layout. The design will be undertaken as described in para 5.11.1.8 of Appendix 7 – Surface Water Drainage and Aquifer Contamination Mitigation Strategy, as is secured through dDCO requirement 6 (REP1-021) The temporary carpark assumes a discharge rate of 2l/s/ha for a 1:30yr event without climate change, as appropriate to its temporary nature. The surface water attenuation volume within the car park network has been reviewed using the MicroDrainage Quick Storage estimate. The temporary surface water treatment, conveyance, attenuation and discharge will be detailed prior to the commencement of the construction and will follow the same principle as surface water management for the operation phase. The detailed design phase will confirm the size of the temporary car park drainage network.

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		The Applicant has provided detailed. information as part of Deadline 1 submission in Appendix 6 – Indicative Temporary Carpark and Compound Drainage Layout and Appendix 7 – Surface Water Drainage and Aquifer Contamination Mitigation Strategy of the OOCEMP (REP1-087).
6.14	No information has been provided about alternative options if infiltration systems are not suitable. Given the understood hydrogeological characteristics of the area, and the limited information submitted with the application to detail the assumptions used in identifying preferred infiltration systems, this is an essential piece of work.	As explained in paragraph 2.3 of the Appendix 7 – Surface Water Drainage and Aquifer Contamination Mitigation Strategy of the (REP1-088) OOCEMP (REP1-087), there are three ways to discharge run off from the site. Discharge to a watercourse or an existing surface water sewer network is not practical for this project as neither are available in the vicinity of the site. Therefore infiltration is the only viable solution. As explained in paragraph 5.11.1.6, the design principles for the initial drainage system are based on the indicative converter station layout, which is designed for an event with a 1:100 year return period plus 40% climate change and a discharge rate of 3.4 l/s. This discharge rate was calculated from 2l/s/ha as advised within HR Wallingford Greenfield Runoff Rate Estimation Tool (UKSuDS, 2018). The outcome of the infiltration survey is expected to validate the current proposal and any significant changes to the current design is unlikely.
6.15	It is highlighted that several sections of the route are subject to high groundwater levels. These areas should be assessed in more detail and proposed measures highlighted to address: • How groundwater ingress into temporary works would be managed without increasing flood risk; • How contamination, as a result of construction practices, would be managed to ensure the aquifers are not affected; and • • How infiltration systems would be secured which ensure a 1 metre unsaturated zone being provided before the maximum known groundwater level.	Environmental Statement Chapter 19(APP-134) Groundwater paragraph 16.6.1.8 it states: "The required groundwater dewatering quantities for trench construction will be determined at detailed design. The designer must ensure the discharge quantities are accurate or conservative to ensure no flood risk should be increased due to surplus groundwater encountered during construction. This applies to all sections." In paragraph 19.6.1.14. there is a similar statement which relates to HDD-4. The above paragraphs state that the details surrounding groundwater dewatering requirements and prevention of any increase in flood risk and contamination spread will be undertaken at detailed design stage as part of the development of the trenching method statement. The cable route itself is not expected to act as a groundwater flow barrier which would result in increased groundwater flood risk. This is secured in the Onshore OCEMP in section 5.7, paragraph 5.7.1.4., bullet point 17. The only infiltration system is at the Converter Station (see response to 6.8).
6.20	The ordinary watercourses and main rivers that could be identified via a desktop study and high-level assessment are included within the Flood Risk Assessment and suitable provision made, in principle, to ensure a consent or permit application is submitted at the appropriate time during the design phase. This is welcomed; however, the Flood Risk Assessment should be enhanced to make reference to any other ditch / watercourse / swale etc. that may need temporary or permanent works during the construction and operational phases. This is in line with the requirements in the Land Drainage Act 1991. The DCO must make provision for Ordinary Watercourse Consent to be required for those temporary or permanent works affecting capacity within a watercourse.	Noted and included within Section 5.7 of the OOCEMP (REP1-087). The DCO does not disapply the need to obtain consent where required for those temporary or permanent works affecting capacity within a watercourse, and therefore the standard statutory position applies to the Proposed Development. It is not necessary to replicate this statutory requirement in the DCO as it is already applicable.

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6.21	The main area of concern with regards to the drafting of the proposed DCO, as submitted, is the lack of reference in relation to the Lead Local Flood Authority. This needs to be in addition to the reference to Drainage Authority and should cover all matters relating to surface water and / or ordinary watercourses.	Reference has been added to the Lead Local Flood Authority in the revised version of the dDCO submitted at Deadline 1 (REP1-021). Furthermore, the Applicant has agreed to discuss matters relating to flooding with HCC following receipt of the comments on flooding matters and on the dDCO in relation to these matters. It is hoped this further meeting will take place before Deadline 3 to allow an updated position to be included in the SoCG with HCC.
6.22	It is recommended that Part 4, (17) is amended to reflect the role of the Lead Local Flood Authority in relation to Ordinary Watercourse consenting and the Land Drainage Act, which should be in parallel with the requirements of the Environment Agency under the Environment Act provisions.	It is not understood what the perceived benefit of referring to the LLFA in Article 17 would be, or where reference could meaningfully be inserted. The DCO does not disapply the need to obtain consent for those temporary or permanent works affecting capacity within a watercourse, and therefore the standard statutory position applies to the Proposed Development. It is not necessary to replicate this statutory requirement in the DCO as it is already applicable. The Applicant has agreed to discuss matters relating to flooding with HCC following receipt of the comments on flooding matters and on the dDCO in relation to these matters. It is hoped this further meeting will take place before Deadline 3 to allow an updated position to be included in the SoCG with HCC.
6.23	It is also requested that the wording around schedule 2 (12) should be amended such that foul and surface water elements are separated and refer to the Lead Local Flood Authority for approval for surface water elements as opposed to the Drainage Authority.	Amendments to address this comment have been made in the revised version of the dDCO submitted at Deadline 1 (REP1-021). The Applicant will confirm with HCC that they are content with the amendments made.
6.25	The Lead Local Flood Authority would highlight that in order to be able to properly consider a surface water drainage proposal a certain level of detail is required and therefore the following two conditions should be included in the DCO requirements; 1. No development shall begin until a detailed surface water drainage scheme for the site, based on the principles within the Flood Risk Assessment PINS ref: EN020022, has been submitted and 24 approved in writing by the Lead Local Flood Authority. The submitted details should include: • A technical summary highlighting any changes to the design from that within the approved Flood Risk Assessment; • Infiltration test results undertaken in accordance with BRE365 and providing a representative assessment of those locations where infiltration features are proposed;	The Applicant has provided detailed information as part of Deadline 1 submission in Appendix 6 – Indicative Temporary Carpark and Compound Drainage Layout and Appendix 7 – Surface Water Drainage and Aquifer Contamination Mitigation Strategy which – to the OOCEMP (REP1-087) . The Applicant has agreed to discuss matters relating to flooding with HCC following receipt of the comments on flooding matters and on the dDCO in relation to these matters. It is hoped this further meeting will take place before Deadline 3 to allow an updated position to be included in the SoCG with HCC.

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	• Detailed drainage plans to include type, layout and dimensions of drainage features including references to link to the drainage calculations; • Detailed drainage calculations to demonstrate existing runoff rates are not exceeded and there is sufficient attenuation for storm events up to and including 1:100 + climate change; • Evidence that urban creep has been included within the calculations; • Confirmation that sufficient water quality measures have been included to satisfy the methodology in the Ciria SuDS Manual C753; and • Exceedance plans demonstrating the flow paths and areas of ponding in the event of blockages or storms exceeding design criteria. 2. Details for the long-term maintenance for the surface water drainage system shall be submitted to and approved in writing by the Lead Local Flood Authority prior to commissioning of the converter station. The submitted details shall include maintenance schedules for each drainage feature type and ownership.	
Landscape and Visual Impact		
7.2	A number of key details (regarding particularly the onshore cable route, landfall and converter station layout) appear to be subject to the final design, which will be led by the appointed contractor (after the DCO has been issued). Due to the significant size of the converter building; and potential long-term visual impacts associated with its operation, it is considered that some of these more significant details should be fixed prior to a Development Consent Order being issued. It is noted that there are a number of areas of cable route where a number of routing options have been retained within the 'order limits'. Local impacts will differ depending on which option is selected. Hampshire County Council expects more certainty on the final route alignment at this stage in order to enable a more informed assessment of the landscape impact of the proposal.	All necessary details required to be fixed at this time to allow a robust assessment of the Proposed Development are provided for in the Application. Furthermore, all necessary controls in relation to the future design within the parameters provided for are secured by the dDCO (REP1-021) and the supporting control documentation. No specific comment is provided on what the key details not included are, or how the submission of those details is not otherwise secured. The submission of such generalised statement is generally unhelpful, and in the Applicant's view the position advanced is without any genuine foundation. With regard to local impacts associated with different options, the Applicant confirms the impacts of all options have been fully assessed. The Applicant also refers to the Applicant's Response to Ex A WQ1 (REP1-091) and a Position Statement (REP1-133) submitted at Deadline 1. That provides an overview of changes made to the Order Limits and how these changes relate to the options and the required flexibility included with the Application. The limited limits of deviation provided for in relation to the Onshore Cable Route are necessary to ensure the Proposed Development can be delivered without risk of impediment. They are also not uncommon for schemes of this nature, and the Applicant refers to its response to ExA WQ CA1.3.17 (REP1-091). It is noted that in certain instances HCC question the deliverability of the Proposed Development and whether sufficient flexibility is provided, but in others claim there is too much flexibility and the route should be more defined. The Applicant is unsure of how HCC wish to reconcile this conflict in their position. Nonetheless, the Applicant's position is that the level of flexibility included is entirely appropriate and proportionate.

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		ES Addendum Appendix 19 (document reference 7.8.1.19) and the updated Outline Landscape and Biodiversity Strategy (REP1-034) submitted for Deadline 1 provide further details of the mitigation measures to be provided in connection with each section of the Onshore Cable Route. It should be noted that Requirement 6 of the revised dDCO (REP1-021) require the final detailed designs to be approved by the relevant planning authority (in consultation with the South Downs National Park Authority where relevant) before any works can commence. In addition, works in the highway network will be required to be approved by HCC in accordance with the protective provisions for the protection of highways and traffic.
7.3	Hampshire County Council also notes and supports the views of its partner local authorities in raising concerns about the indicated scale of the proposed converter station and the inevitable impact this will have on the rural setting of its location. Opportunities to reduce this impact, including the potential reduction in scale/height of the building within the landscape should be explored further.	The Applicant refers to the separate Position Statement – Appendix 1 Converter Station Design Credentials WQMG1.1.3 (document reference 7.4.1.1) submitted alongside the Applicant's Response to EXA WQ1 (REP1-091) which refers to the design approach and design credentials and the updated Design and Access Statement (DAS) (REP1-031) submitted at Deadline 1 in addition to the Applicant's Response to Relevant Representations (REP1-160) – Hampshire County Council (RR-093), CPRE Hampshire (RR-028), South Downs National Park (RR-049) and East Hampshire District Council (RR-162) (REP1-160) which refer to the nature of landscape and visual effects, the updated DAS and accompanying design principles. The size of the Converter Station is driven by its operational requirements. It cannot be reduced. The reduction of the size has been explored, and the size is only so much as is necessary for its operation. Furthermore, opportunities to cut the Converter Station into the landscape have been exhausted, going as so far is feasible without potentially impact on the underlying principal chalk aquifer. It is noted that in paragraph 4.12.1 of the SoCG with HCC submitted at Deadline 1 that HCC states "the proposed mitigation appears to be in scale with the development and is capable of reducing the impact of the proposal in the landscape" (document reference 7.5.5).
Ecology		
9.1	Hampshire County Council is broadly content that the methodology set out in the Environmental Statement in relation to ecological considerations follows current industry standards and is an appropriate approach. Horizontal Directional Drilling through the Denmead Meadows Site of Importance for Nature Conservation (SINC) is essential, given it supports Lowland Meadow priority habitat of national importance. Recognition of its SINC status (confirmed March 2019) needs to be reflected in Fig 16.2 of the Environmental Statement Vol 2 dated November 2019.	The Applicant notes that HCC is content with the methodology set out for Biodiversity in the ES. The use of HDD allows the complete avoidance of Soake Farm Meadows SINC within Denmead Meadows. The designation of Soake Farm Meadows SINC is presented in Plate 6.3 of the updated OOCEMP (REP1-087) and fully assessed within the ES Addendum (REP1-139).
9.2	The mitigation strategy needs to be carefully reviewed to ensure that appropriate weight is applied to locally designated sites, and management prescriptions are appropriate and proportionate for enhancement of priority habitats. For example, it is proposed that the seeding of the substation, which is situated on chalk soils will be supplemented by seed harvested from	The ES Addendum (REP1-139) in Chapter 10 provides an update on mitigation in regard to Denmead Meadows (including Soake Farm Meadows and Kings Pond SINC). These aspects are fully documented in both the updated Onshore Outline Code of Construction Practice (REP1-087) and the updated Outline Landscape and Biodiversity Plan (REP1-034). With reference to seed provenance, it is considered appropriate to utilise that harvested from adjacent higher quality grassland to be applied to semi-improved areas regardless of geology.

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	Denmead Meadows which is on the clays and gravels. Seed should be sourced from soils appropriate to the local geology	
Highway Trees		
10.2	Suitable control over the impact of development proposals on highway trees is usually secured through Section 278 licences. In these circumstances, evidence is required to justify the proposals, including surveys of relevant trees and the securing of appropriate mitigation. Most recently, the County Council has adopted a new policy which requires compensation for the loss of highway trees. Further details are available here: https://documents.hants.gov.uk/transport/HighwaysTreePolicy.pdf	The mitigation hierarchy regarding trees is outlined in the updated OOCEMP (REP1-087) Section 5.3.4 and 6.2.2 specifically referencing adherence to British Standard 5837:2010 "Trees in Relation to Design Demolition and Construction - Recommendations" and the requirement for an Arboricultural Method Statement as part of the detailed CEMPs in line with the Generic Arboricultural Method Statement provided in Appendix 16.3 (Arboriculture Report, Appendix F) (App-411). Compensation would be achieved through appropriate compensatory tree planting within the locality, which is secured through the OOCEMP (REP1-087).
10.3	The proposals as submitted fail to demonstrate the impact of the development on the County Council's highway trees. In the continued absence of such information, the County Council is concerned that the proposals would have an unacceptable impact on these trees, many of which are likely to have a landscape and amenity value.	Revised tree retention plans have been issued which detail the trees expected to be retained, those at risk and those expected to be lost as a worst-case scenario. This can be found at REP1-101, Appendix 10 Tree Survey Schedule and Constraints Plans. The Applicant will discuss this further information with HCC to confirm they are content the potential for impacts on the County Council's highway trees has been demonstrated.
APPENDIX ONE – Hampshire County Council comments on specific elements of the submitted draft Development Consent Order Articles and Requirements		
	Hampshire County Council have reviewed the dDCO. In summary the elements that Hampshire County Council consider necessary to be secured within the DCO (or by separate planning obligation or other legal agreement where appropriate) for this development are as follows: 1. In the absence of any supporting information justifying the benefits of discounting the Permit Scheme, the Applicant should commit to HCC's Permit Scheme within the New Roads and Street Works Act 1991 to allow for the planning and co-ordination of the pipeline works. If this is not adhered to, HCC seek further details on what is to be secured and funding requirements for additional officer time in relation to any scheme specific process. 2. Funding for HCC's use of the one.network 'route monitor' product specifically for the A3 corridor during the course of construction works to enable HCC to be alerted to highway problems arising on this corridor. 3. The requirement for the Applicant to progress temporary weight restrictions through the Temporary Traffic Regulation Order (TTRO)	1. The Applicant is fully committed to following necessary process, however it is the case that to ensure the delivery of the Proposed Development within good time and minimising adverse impacts a more bespoke approach cognisant of and ensuring compliance with the FTMS (REP1-068) is required. It is considered all necessary agility has been included for within the protective provisions for the protection of highways and traffic, which the Applicant looks forward to discussing with the authority. The Applicant has already confirmed its willingness to enter into a post consent PPA to cover the authority's resourcing. 2. This will be further discussed with the authority, having not been raised before now. 3. The Applicant will obtain the TTRO's which are necessary in connection with the Proposed Development so as to comply with relevant highway requirements via the DCO. To require this outside of the DCO would fundamentally undermine its benefit and the purposes of the Planning Act 2008 regime. 4. Please see the response to paragraph 5.26 of the LIR in this regard. An indemnity is not appropriate or justified and will not be provided. Reinstatement is governed by the New Roads and Street Work Act 1991 and in accordance with the protective provisions for the protection of highways and traffic.

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	process to restrict use of certain roads by larger vehicles, if directed by the Highway Authority. 4. An indemnity to cover the potential cost of diverting the cables should this be necessary to facilitate highway works in the future, especially considering significant works committed at the A3/Ladybridge Road junction via the Transforming Cities Fund scheme for South East Hampshire Rapid Transit and planning approved development-led capacity improvements. 5. Agreement for full lane width carriageway resurfacing reinstatement along the A3 corridor to prevent an ongoing maintenance liability due to excessive trenching along the route. 6. The preferred approach is that the Applicant adheres to HCC's standard processes including provision of a legal agreement between the Applicant and HCC under Section 278 of the Highways Act 1980 for the site access works and any highway works required outside that of the cable laying works. This allows the Council, in its role as Highway Authority, appropriate controls in respect of these works. Entering into the agreement would also provide a surety to directly protect the Highway Authority's liabilities on these matters. 7. In the absence of a Section 278 Agreement, HCC will seek separate measures for payment of the costs of design checking and inspection fees to cover the approval and review of the proposed access works. 8. A clear process needs to be established and secured for the Applicant to submit the detailed designs of all infrastructure to be installed in highway land. This process will include the need for review and approval of the design by the Highway Authority. The Highway Authority will need to give approval for the works prior to construction. 9. There is uncertainty under what powers future maintenance would be undertaken to the cable route. It is suggested that to allow for the future maintenance of the cables and reinstatement of the carriageway, the 29 Applicant commits to HCC's permitting scheme within the New Roads and Street Works Act 1991. 10. The DCO must make appropriate provision for future permissions for the decommissioning phase of the development. 11. As presented within the application the DCO will need to produce and provide Construction Traffic Management Plans, which builds on the Framework Construction Traffic Management Plan. Appropriate	5. The need for lane width carriageway surfacing is not accepted. This request is considered at best to be opportunistic and not justified. The Applicant will comply with all statutory requirements for the reinstatement of the highway, so as to ensure the works it carries out are reinstated to the required level and subject to the relevant guarantee periods. 6. The position in relation to amendments to the layout of streets is to be governed via Article 10 of the draft DCO, with the benefit of a DCO being that it is a single consent. It will be necessary for the authority to approve any such amendments, which it is acknowledged they will do in accordance with their usual design check process. To require this outside of the DCO would fundamentally undermine its benefit and the purposes of the Planning Act 2008 regime. The Applicant has already confirmed its willingness for all post-consent resource to be covered via a PPA. 7. See above. 8. A clear process is provided for by the protective provisions for the protection of highways and traffic included at Part 5 of Schedule 13 to the draft DCO (REP1-021). The Applicant looks forward to discussing these with the authority to confirm all necessary design information is provided for. 9. The New Roads and Street Works Act 1991 is applicable in relation to the maintenance of the Proposed Development. It should be noted cable failure is extremely rare and maintenance activities will be minimal. 10. Decommissioning will be consented in accordance with the applicable requirements at the time of decommissioning. Given how these could change over the next 40 years (which is the anticipated operational lifetime, but this could be longer) it is not appropriate for consent to be obtained for this now or for requirements to be imposed in relation to what would be required. . 11. Requirement 17 clearly provides for construction traffic management plans to be produced and approved which must be in accordance with the FCTMP. Schedule 3 to the draft DCO provides the approval timescales. To require this outside of the DCO would fundamentally undermine its benefit and the purposes of the Planning Act 2008 regime. 12. The Applicant will obtain the TTRO's which are necessary in connection with the Proposed Development so as to comply with relevant highway requirements. 13. The position in relation to amendments to the layout of streets is to be governed via Article 10 of the draft DCO, with the benefit of a DCO being that it is a single consent. It will be necessary for the authority to approve any such amendments, which it is acknowledged they will do in accordance with their usual design check process. The Applicant has already confirmed its willingness for all post-consent resource to be covered via a PPA. 14. This is acknowledged and it is not understood on what basis the authority think this is not already the position.

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	timescales should be secured for submitting and reviewing along with a list of what needs to be included and approval by Highway Authority prior to commencement of that section of works. 12. The DCO should require the Applicant to apply for a Traffic Regulation Order (TRO) to prevent right turn movement from the proposed site access onto Broadway Lane. 13. Should the Applicant not adhere to HCC's Section 171 license procedure, HCC require the payment of the relevant fees and the design of the highway works to be provided to the Highway Authority's satisfaction. 14. All costs associated with the works to the signals to allow for abnormal load movements at the Portsmouth Road/Catherington Lane/Dell Piece Junction should be required to be paid for by the Applicant. 15. Abnormal Indivisible Loads (AiL) plan/ process to be provided in sufficient time for Highway Authority review and approval before any AiL movements are permitted. 16. The Applicant should commit to following HCC's standard TTRO process. 17. A process for Coordination with planned highway works in the vicinity which includes known works to date being significant works on the route itself and within the immediate area to facilitate approved and emerging housing sites and works to be implemented under the Transforming Cities Funding. 18. A requirement for the use of the 'Hampshire Countryside Service Temporary Closure' procedure for temporary closures and provision of alternative routes during construction for any rights of way affected by the works.	15. The provision of AIL information is addressed in the FCTMP. The Applicant is willing to discuss any further requirements the authority may require in this regard. 16. The Applicant will obtain the TTRO's which are necessary in connection with the Proposed Development so as to comply with relevant highway requirements. The process for this is provided at Article 16 to the draft DCO, which aligns with the usual statutory process. Whilst the Applicant's position is that the works must be carried out in accordance with the programme mitigations included for within the FTMS, the Applicant acknowledges the need to carry out works in a co-ordinated manner provided that does not jeopardise the delivery timescale fort he works, which all parties acknowledge need to be carried out in good time to minimise disruption. 17. The process for the temporary stopping up of highways is provided for at Article 13 to the draft DCO, which aligns with the usual statutory process. The applicant has scheduled for an infiltration survey to be undertaken in the week commencing 16th November to confirm the infiltration rate. The outcome of the survey is likely to become available for Deadline 6 submission.
1	The definition for 'maintain' does not accord with the scope of the proposed works and appears to permit replacement, reconstruction and the decommission of any permitted works. It is suggested that the wording is amended to apply more clarity over the permitted works under the term 'Maintain'. The definition set out in the (draft) DCO for the replacement Southampton to London Pipeline is suggested as an alternative. This defines 'maintain' as "in relation to the authorised development includes to inspect, assess, repair, test, cleanse, adjust, alter, divert, renew, re-lay, improve, landscape, preserve, make safe, dismantle, remove, clear, reconstruct, refurbish, replace, demolish, abandon or decommission any part of the	For clarity, the definition of maintain in the dDCO (REP1-021) is: "maintain" includes inspect, upkeep, repair, adjust, alter, improve, preserve and further includes remove, reconstruct and replace any part of the authorised development, provided such works do not give rise to any materially new or materially different environmental effects to those identified in the environmental statement and "maintenance" must be construed accordingly; There is no reference to decommissioning, and the scope of works is limited by reference to the environmental effects assessed.

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	authorised development, provided such works do not give rise to any materially new or materially different environmental effects to those identified in the environmental statement and for the avoidance of doubt must not include the renewal, re-laying, reconstruction or replacement of the entirety of the pipeline works, and any derivative of "maintain" is to be construed accordingly";	It is noted that the Southampton to London Pipeline is a pipeline and that maintenance activities will therefore be different. It is not clear why any amendments to this definition are considered to be required.
2.	The definition for 'Street' refers to section 48 of NRSWA but for clarity it is suggested that the DCO should list the definition in its entirety so it is clear that any clauses in relation to this definition also cover all roads, footways, pavements, public footpaths, bridleways and all other public rights of way, whether it is for the time being formed as such , together with land on the verge of a street or between two carriageways.	This is already clear by reference to the defined term. It is not clear what benefit this amendment is considered to add when one reads the document properly and in accordance with its defined terms.
3.	The definition for 'temporary associated development works' refers to works area numbers 3 and 8 as described in Schedule 1. This appears to be a drafting error as there does not appear to be a 'works number 8'. Clarity is sought on this matter.	On review this defined term is not used in the draft DCO and will be removed on this basis.
4.	Similarly, the definition of 'traffic management strategy' should perhaps refer to requirement 19 rather than the suggested requirement 24. Clarity is also sought on this drafting.	Amendments have been made in relation to this following the inclusion of the protective provisions for the protection of highways and traffic.
5.	The definition of 'street authority' refers to Part 3 of the 1991 Act. The definition should be written in full for clarity within the DCO.	This is already clear by reference to the defined term. It is not clear what benefit this amendment is considered to add when one reads the document properly and in accordance with its defined terms.
6.	The definition for 'working day' should be amended to a 'business day' to avoid confusion over separate matters relating to working hours which may be outside of a 'business day'.	This amendment is not considered to be necessary. The definition is sufficiently clear and commonly used.
7.	Part 2 section 3 (2) refers to works number 8. As raised above, clarification is sought on the accuracy of this reference.	Noted. This will be amended in an updated draft of the DCO.
8.	Article 8 (3) – Seeks to disapply the Permit Scheme and this this is not considered acceptable unless a clear and compelling benefit to the public can be demonstrated making this requirement necessary. The Hampshire County Permit Scheme replaced the existing noticing regime as specified in the New Roads And Street Works act 1991. Powers to replace noticing with regimes with permit schemes is provided in the Traffic Management Act 2004. Permit schemes are a nationally prescribed system for coordinating all works on the public highway. Permit schemes form a critical part of enabling a Highway Authority to execute its legal duties to coordinate all works and maximise traffic flow. All works promoters (utility companies and County Council works) ordinarily need to apply for a permit to undertake works. Prior to granting a permit the County Council will review the proposals and check for clashes	The Applicant is fully committed to following necessary process, however it is the case that to ensure the delivery of the Proposed Development within good time and minimising adverse impacts a more bespoke approach cognisant of and ensuring compliance with the FTMS (REP1-068) is required. It is considered all necessary agility has been included for within the protective provisions for the protection of highways and traffic. , which the Applicant looks forward to discussing with the authority. This is the clear and compelling reason why the permit scheme is not to be utilised. The protective provisions for the protection of highways and traffic have been purposefully drafted taking into account HCC's Traffic Management Permit Scheme Order 2019 and moreover the authority's legal duties in relation to the management of its network. It is considered they are adequate to ensure all legal duties will be capable of being complied with, and that they will ensure the efficient coordination of the works to the benefit of all parties. If the authority has any specific

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	with other works or activities. Permits may be granted subject to conditions which are aimed at minimising disruption to traffic flow (e.g., working outside of peak times). Permits are never withheld unreasonably, and conditions are always relevant to the impact on the network. Standard response t	concerns about its ability to comply with its legal duties to coordinate works and maintain traffic flow, the Applicant would be grateful to be made aware of these. The need for approval of detailed traffic management strategies ensures reasonable conditions can be included, as would be the case where the permit scheme is used. Ultimately the works must be carried out in accordance with the FTMS (REP1-068) and the process included within the DCO provides for this whilst protecting the interests of the authority. The Applicant has already confirmed its willingness to meet the authority's recourse costs for post-consent approvals via a PPA. It not considered the process provided for by the DCO is any more resource intensive than if the permit scheme were followed, and in fact taking into account how the works need to be delivered in accordance with the FTMS (REP1-068) to minimise impacts it is considered following the permit scheme would be an ill-fit and cumbersome in relation to the Proposed Development, and ultimately would require more resource as well as potentially jeopardising the efficiency of deliverability.
9.	Article 21 relates to clauses in association with the workplace travel plan. It should refer to the framework travel plan which is yet to be approved. However, Hampshire County Council request that the travel plan requirements are secured through s106 obligation to enable the Highway Authority to secure a more robust list of obligations with its own ability to enforce. In addition, Hampshire County Council seek s106 payments for travel plan approval and monitoring fees along with a surety deposit should the applicant default on its travel plan obligations.	Requirement 21 is considered to be more than adequate to secure compliance. It is unclear why any such surety would be required, or what this would potentially be spent on by the authority if provided.
10.	Article 10 relates to the approval mechanism for works to the highway. The clauses within this section are not supported by the Highway Authority. The Highway Authority's position is that the Applicant should agree to the Hampshire Permit Scheme and S278 design check process for the works. This would allow the Highway Authority to review the relevant detail, provide relevant protections and controls as necessary for the type of works and enable the works itself to benefit from the flexibility and agility provided through these processes. The Highway Authority has yet to be presented with information which demonstrates a compelling benefit to the public, Highway Authority or indeed the Applicant in discounting these established processes. Once the approach for approvals is agreed, the clauses in Article 10 will need to be reviewed further to ensure appropriate measures are secured.	Any amendments to the highway are to be carried out in accordance with the powers provided for this in the DCO, the significant benefit of which is to ensure there is not a need to obtain such agreements in connection with the works and instead providing statutory authority to do so. All necessary approval processes are required to be followed in accordance with Article 10. The compelling benefit of following this approach is to ensure the deliverability of the scheme. The authority's position in this regard appears to fundamentally question the benefits of the Planning Act 2008, which is designed to provide a single consent to ensure the deliverability of projects of national significance to ensure the significant benefits which they provide are delivered.
11.	Article 10 (1) appears to provide powers to the Applicant for works both within and outside of the Order Limits. Clarification is sought as to how works outside of the Order Limits would be appropriately controlled through the DCO. Article 10 (3) is not entirely clear in its present drafting and should be reviewed. One suggestion would be to consider splitting the paragraph into two sentences: the first to cover the powers not being exercised without the	The power does provide for works within and outside the Order Limits for the purpose of constructing and maintaining the authorised development, being a key test included in the article. The Article itself provides the necessary controls, and is a form seen in many made DCO's. Article 10 (3) is considered to be sufficiently clear, though the Applicant is content to discuss this further with the authority.

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	approval of the street authority, the second to cover how the powers would be approved.	
12.	The Highway Authority's position in relation to Article 11 is seeking the retention of the Permit Scheme as an appropriate mechanism for the management of the highway during the works. If the Permit Scheme is disapplied, the clauses here would need to be reviewed to ensure they provide suitable protection.	The permit scheme will not be applicable so as to ensure the works can be delivered in a co-ordinated manner in accordance with the programming mitigations include for within the FTMS (REP1-068) so as to ensure an efficient delivery minimising impacts. The authority was provided the protective provisions for the protection of highways and traffic some months ago and no comment on these has been received. The Applicant's position in this regard will not change.
13.	Article 13 refers to temporary stopping up of the highway. Hampshire County Council believe that this actually refers to temporary traffic regulation orders and the wording and definitions should be amended. Stopping up is a separate process either via section 247 of the Town and County Planning Act 1990 or section 14 Of the Highways Act 1980. The title of this Article should be renamed for clarity: "Temporary closure, alteration, diversion or restriction of streets and public rights of way". Whilst noting the provisions in (5) Clarity is also sought on the details of the approval process for such temporary works, including consultation with the relevant street authority.	Permanent stopping up is a process governed by the powers stated. Temporary stopping up is a separate matter. The Article included is common in made DCOs and provides necessary statutory authority for the temporary stopping up of streets and public rights of way. Where a TTRO is also required to be obtained for this purpose, that is provided for by Article 16. Titles of Articles are not relevant for their interpretation. The Applicant will further discuss with the authority what clarity it may require on the approval process, albeit Article 13(8) is clear.
14.	Article 14 (1 (b)) of the dDCO should perhaps refer to requirement 10 (Highway accesses) as opposed to requirement 9 (Biodiversity management plan). Further clarity on the proposed process is sought. As already set out, the Highway Authority would prefer to agree within the DCO that the Applicant will adhere to Hampshire County Councils S278 process and enter into a separate legal agreement under s278 of the Highway Act 1980 for the site access works.	This has already been corrected in the revised version of the draft DCO submitted at Deadline 1.
15.	Article 15 of the dDCO refers to agreements with street authorities. Hampshire County Council seeks clarity on the overall aim of this Article and the intention of these clauses.	This article is included to confirm the position that any such necessary agreements may be entered into. The reasons for the inclusion of this Article is confirmed in the Explanatory Memorandum. It is not clear what further clarification is required, though the Applicant is content to discuss this further with the authority as necessary.
16.	Article 16 relates to the Traffic Regulation Order (TRO) process. The clauses refer to 'traffic authority' and this is not defined anywhere. It is suggested that these references are replaced with 'Highway Authority'. There is also concern about the rationale for the Applicant to secure powers to make permanent TRO's. For the purpose of construction, it is contended that the Applicant should only have powers to implement temporary TRO's and these should still be done so with the agreement of the Highway Authority who are experienced in managing and implementing such restrictions. Additional clauses are also sought to require the application to remove all temporary TRO's on completion of each phase (or whole works where appropriate) to ensure the network is restored to its current arrangement.	An appropriate defined term will be used as requested. Article 16 provides the power to make traffic regulations orders with the approval of the relevant authority. This is only in so far as is necessary in connection with the Proposed Development. As it will not be necessary to implement any permanent measures in connection with the Proposed Development, they would not be authorised by the power. There is no need for additional clauses.

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17.	Article 41 and 42 relate to arboricultural matters and the Applicant is seeking permission to fell or cut back tree within or overhanging the order limits or any shrub 'near any part of the authorised development'. There is concern that this provision is not sufficiently precise and is open for interpretation. Further clarity is therefore sought. The clause refers to payment of compensation for unnecessary loss or damage. However, it is unclear if this compensation is just for unnecessary loss or damage rather than for all loss or damage and this needs to be clarified.	Both articles provide for a test of necessity, therefore appropriately ensuring unnecessary felling is not undertaken. Compensation would be for unnecessary damage only, and the process with regard to any dispute in this regard is provided for at Article 41 (3). As outlined in Section 6.2.2 of the OOCEMP (REP1-087): *Pruning outside of the Order Limits to allow abnormal loads shall be designed to comply with The Highways Act 1980 section 154 requirements. This is a statutory obligation for the person who owns / is responsible for the trees to prune trees to remove an obstruction to the safe use of the highway. Where the abnormal load requires additional clearance, this shall be targeted pruning at specific points to be agreed with the haulier, landowner, project team and where appropriate, the local planning authority prior to the works being carried out. All tree works are to be carried out in accordance with British Standard 3998:2010 "Tree Work - Recommendations".* *Within the Order Limits lopping and felling of trees may only be carried out where absolutely necessary and will be prescribed in accordance with British Standard 3998: 2010 "Tree Works – Recommendations" and industry best practice. All pruning and felling works shall be specified by a suitably trained and experienced Arboriculture consultant and shall be carried out by a suitably trained and experienced arboriculture contractor* The Articles are authorising powers. They do not permit works which are not in accordance with the relevant applicable controls and approvals. It is those controls and approvals which are relevant. The, the authorising powers are not required to be amended to reflect those. The DCO is to be read as a whole statutory instrument.
18.	The draft wording refers to the terms 'reasonable' and 'necessary' with regards judgements being made on potential tree losses. However it does not define these terms, or establish who is responsible for determining whether any arboricultural work is reasonable or necessary. The draft text should be amended to refer to assessments being carried out by a competent arboriculturist and in agreement with the Highway Authority	As outlined in the updated OOCEMP (REP1-087), detailed Arboriculture Method Statements in accordance with British Standard 5837:2012 will be produced to ensure appropriate protection of retained trees. Tree works including felling will be assessed and prescribed by a suitably trained and experienced Arboriculture professional. This is to be determined by the Applicant. As outlined in the updated OOCEMP, detailed Arboriculture Method Statements in accordance with British Standard 5837:2012 will be produced to ensure appropriate protection of retained trees. Tree works including felling will be assessed and prescribed by a suitably trained and experienced Arboriculture professional.
19.	Hampshire County Council seeks robust requirements in the DCO to enforce a mitigation hierarchy regarding HCC owned trees as follows: • Unless a tree is structurally impaired, dead, or diseased, such that it would need to be removed for sound arboricultural management within the next five years. Then, • Ensure that cable trenching and any associated construction work, storage and traffic is excluded from the Root Protection Area (RPA) as recommended by BS5837:2012[1] or canopy spread, whichever is largest. If this is not possible then, • Work within the RPA must only be done in accordance with an Arboricultural Method Statement (AMS) prepared by a competent	The mitigation hierarchy regarding trees is outlined in the updated OOCEMP (REP1-087). Section 5.3.4 and 6.2.2 specifically referencing adherence to British Standard 587:2010 Trees in Relation to Design and the requirement for an Arboricultural Method Statement as part of the detailed CEMPs in line with the Generic Arboricultural Method Statement provided in Appendix 16.3 (Arboriculture Report, Appendix F) (App-411). Compensation would be achieved through appropriate compensatory tree planting within the locality.

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	arboriculturist and approved by HCC Highways Arboriculture. This AMS must include details of special methods and techniques that will be used, such as micro-tunnelling or air spade excavation, for example, and any methods of ground protection and physical barriers that will be needed to avoid root damage, canopy damage and soil compaction, which will cause subsequent root damage. If this is not possible then, • As a last resort remove the tree(s) and provide compensation for the loss at the appropriate CAVAT value. This must be agreed with HCC Highways Arboriculture prior to tree removal.	
20.	There are a number of requirements which require the relevant planning authority and appropriate highway authorities to be more precisely defined. These include: • Requirement 3 (1) • Requirement 6 (1) • Requirement 6 (2) • Requirement 6 (3) • Requirement 6 (4) • Requirement 22	The use of defined terms is considered to be appropriate, however the Applicant is content to discuss this further as necessary.
21.	Requirement 10 is a clause which would be incorporated within HCC's Section 171/ Section 184 and Section 278 processes. The Highway Authority seeks a review on the agreement of the mechanism for approving and delivering the works on the highway to be explored further through the examination.	The approval process is provided for at Schedule 3 to the draft DCO (REP1-021). It is not clear what the authority further requires, noting they can approve using their own processes within the timescales provided for and the Applicant has confirmed its willingness to enter into a PPA to cover resource for all such approvals.
22.	Requirement 18 covers the construction hours of the project. Whilst provision is made to vary these within the Construction Environment Management Plan, it is considered that the drafting of the Requirement itself requires amending to provide for sufficient clarity and flexibility as the works progress. A requirement similar to that proposed in the DCO for the Southampton to London Pipeline project is considered to be a reasonable starting point which reads as follows: (1) Subject to sub-paragraphs (2), (3) and (4), construction works must only take place between 0800 and 1800 on weekdays (except Public and Bank Holidays) and Saturdays, except in the event of an emergency. (2) In the event of an emergency, notification of that emergency must be given to the relevant planning authority and the relevant highway authority as soon as reasonably practicable. (3) The following operations may where reasonably necessary continue or take place on an exceptional basis outside the working hours referred to in sub-paragraph (1)— (a) trenchless construction techniques which cannot be interrupted; (b) filling, testing, dewatering and drying; (c) works required to mitigate delays to the construction of the authorised development due to extreme weather conditions; and (d)	This request is noted and is being further considered.

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	commissioning of the pipeline works. (4) Nothing in sub-paragraph (1) precludes— (a) the receipt of oversize deliveries to site and the undertaking of non-intrusive activities; (b) start-up and shut-down activities up to an hour either side of the core working hours and undertaken in compliance with the CEMP; and (c) works on a traffic sensitive street where so directed by the relevant highway authority pursuant to a permit granted under the permit schemes and following consultation by the relevant highway authority with the relevant planning authority under the terms of such scheme. (5) In this Requirement— (a) "emergency" means a situation where, if the relevant action is not taken, there will be adverse health, safety, security or environmental consequences that in the reasonable opinion of the undertaker would outweigh the adverse effects to the public (whether individuals, classes or generally as the case may be) of taking that action; and (b) "non-intrusive activities" means activities which would not create any discernible light, noise or vibration outside the Order Limits.	
23.	Requirement 19 sets out the traffic management strategy and the mechanism for approval of proposed traffic management measures. The Highway Authority will need to undertake a detailed review of these requirements once agreement has been reached regarding the mechanism for approving and delivering the works on the highway	Requirement 19 relating to traffic management strategies has been removed. The authority has been aware this was to be removed and replaced with the protective provisions in relation to the protection of highways and traffic, having been in receipt of those for some time. The Applicant looks forward to discussing these with the authority.
24.	Requirement 21 relates to securing the travel plan requirements and makes no reference to be in accordance with the framework travel plan. Presently there is no mechanism in place to secure any fees to cover costs of this work. In the absence of such provision through suitable alternative mechanisms, Hampshire County Council requests that this is secured under s106 obligation to enable it to secure the necessary approval fees for the full travel plan and the associated monitoring fees, as well as a bond/cash deposit to cover and default on the proposals by the Applicant.	Revisions are made to Requirement 21 to refer to the framework travel plan in the revised draft of the DCO submitted at Deadline 1 (REP1-021). As explained, any fees for post-consent approvals will be covered by a post-consent PPA. Requirement 21 is considered adequate, and the request for a bond is not necessary or justified. Compliance is secured by the Requirements and the DCO and any non-compliance would be addressed in accordance with the statutory regime.
25.	The provisions of Schedule 3 require some further clarity. This includes indicating the level of information that is considered necessary for the Highway Authority to discharge its obligations.	We look forward to discussing the protective provisions in relation to the protection of highways and traffic with the authority, which are relevant to highway approvals.
26.	The Highway Authority also seeks provision for the payment of fees to cover its costs in this regard. The following is suggested as a starting point for incorporation in the DCO in this regard: "Where an application or a request for comments is made to a relevant planning authority for any consent, agreement or approval required by a Requirement, a fee must be paid to the relevant planning authority as follows— (a) such fee as may be prescribed (under sections 303 and 333(2A) of the 1990 Act for the discharge of conditions attached to a planning permission); or (b) a fee of £97 per application or request. Any fee paid under this	This request is noted. The Applicant has confirmed its willingness to enter into a PPA for post-consent approvals.

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	Schedule must be refunded to the undertaker within 35 days of— (a) the application or request being rejected as invalidly made; or (b) the relevant planning authority failing to determine the application or to provide written comments within 28 days from the date on which the application or the request for comments is received, unless within that period the undertaker agrees in writing that the fee may be retained by the relevant 36 planning authority and credited in respect of a future application or a future request for comments"	
27.	This sets out a list of roads, footpaths and public rights of way that are subject to proposed stopping up. Hampshire County Council seeks clarity on whether this relates to temporary closures. The schedule provides no detail on the proposed length or type of closures required. If the reference to stopping up is correct there has been no information provided which justifies the need and associated benefits for formal stopping up and should stopping up be agreed this should only be for a temporary basis, permanent highway rights should not be affected.	No power to permanently stop up highways is included in the DCO. The Schedule is also clearly referred to in the relevant articles. Further details of roads which require temporary stopping up to facilitate full road closures during construction of the Onshore Cable Route can be found in the FTMS (REP1-068). Further details of temporary stopping up and diversions of Public Rights Of Way is provided within ES Addendum Appendix 14 Note on PRoW Long Distance Walking Paths and Cycle Route Diversions (REP1-145) submitted at Deadline 1.
28.	The list of trees subject to a TPO does not represent any highway assets under the jurisdiction of HCC. Hampshire County Council do not TPO highway trees as a general requirement as they are under a mechanism of good arboricultural management under the care of the Highway Authority and therefore a TPO is not considered necessary. The Highway Authority do not normally give permission to third parties to remove highway trees unless through a S278 process and within which appropriate compensation for the loss of the asset is achieved through CAVAT.	Please refer to the Applicant's response to point 18.
29.	Article 13 sets out the protective provisions for a number of Statutory Undertakers, however it provides no protective provisions for highway apparatus such as but not exclusively gullies, sewer pipes, catch pits, manholes, soakaways, culverts , service ducts, detector loops, traffic signals and supporting apparatus and private street lighting cables. There is also an absence for protection of private apparatus licenced for location within the highway.	Provisions for the protection of water and sewerage undertakers are provided for at Part 1 of Schedule 13. The Applicant is content to discuss any further protections the authority considers are required in relation to highways infrastructure to the extent they are not already considered to be covered. Any examples of such necessary protective provisions included in other made DCO's for the benefit of the authority would be gratefully received.
30.	The Highway Authority require sufficient protective provisions to the same manner as other Statutory Undertakers. Drafting of appropriate provisions should be discussed with the Highway Authority.	Protective provisions were provided to the authority some time ago. No comment has been received
31.	With regards street lighting provision Hampshire County Council have a private finance initiative agreement with SSE. Due to the nature of this agreement, and the permissions needed from the electricity company for working on their networks, the 28 day notice period provided by 5 (2) of	It is not clear what is being referred to here, as there is no section 13 to the dDCO. Nonetheless, the requirements for SSE are being discussed with SSE.

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	Section 13 is insufficient. A minimum period of 30 working days is required, the preferred however is 60 working days.	
32.	There is concern that the present drafting of Article 17 is overly broad in its description of permissible activities. In particular, it is unclear whether the provision seeks to authorise activities which would require an ordinary watercourse consent, under the Land Drainage Act 1973. In addition, any discharge to a watercourse will need to be assessed to ensure that flood risk is not increased downstream and to enable effective pollution control. There would also be a presumption against any discharge into highway drainage systems but this would be for the Applicant to liaise with the relevant Highways Authority for any specific requirements should this be necessary.	The Applicant has confirmed that all necessary consents will be obtained and that Article 17 does not override any requirements for this, nor is this disapplied elsewhere. This is confirmed in the Other Consents and Licences document (REP1-030). Article 17 follows a standard form, and is considered to be adequate to provide the powers necessary. The requirements for surface water consents and permits are outlined in the updated OOCEMP (REP1-087) in Section 5.7. The form of Article 17 is materially the same as Article 18 of the Southampton to London Pipeline DCO, save for removing provisions not relevant to the Proposed Development such as in relation to main rivers, as no main rivers are affected.
33.	Clarification is sought about the type of connections to the public sewer or drain envisaged in Article 17 (2).	There may be a necessity to use public sewers or drains as a means of discharging groundwater collected by dewatering during the construction phase. Please refer to Environmental Statement Chapter 19 (APP-134), paragraphs 19.6.1.4., 19.6.1.5. (Onshore Cable Trenching) and 19.6.1.13. (Horizontal Directional Drilling).
34.	Amendments to Article 17 (3) are requested to make it clear that consent should also be secured from the bodies responsible for managing the risk of flooding (i.e. the Lead Local Flood Authority and/or Environment Agency)	The Applicant has confirmed that all necessary consents will be obtained and that Article 17 does not override any requirements for this. This is confirmed in the Other Consents and Licences document (Document Reference 5.2). Article 17 follows a standard form, and is considered to adequate to provide the powers necessary. It is not appropriate or necessary to amend the Article to confirm this. It is an authorising power, consent will be obtained from all persons necessary, as is required. It is noted the form of the paragraphs is the same as that provided for in the corresponding paragraph of the Southampton to London Pipeline DCO.
35.	Similar to the comments made on Article 17 (3), amendments are also sought to 17 (4) to acknowledge the need to secure consent from the Lead Local Flood Authority and/or Environment Agency.	The Applicant has confirmed that all necessary consents will be obtained and that Article 17 does not override any requirements for this. This is confirmed in the Other Consents and Licences document (REP1-030). Article 17 follows a standard form, and is considered to adequate to provide the powers necessary. It is not appropriate or necessary to amend the Article to confirm this. It is an authorising power, consent will be obtained from all persons necessary, as is required. It is noted the form of both paragraphs are the same as those provided for in corresponding paragraphs of the Southampton to London Pipeline DCO.
36.	The period for determining such an application should be extended in 17 (5) to be in-line with normal LLFA consenting requirements i.e. 2 months from the	The timescale provided for is considered to be appropriate to ensure the Proposed Development is delivered efficiently. The Applicant confirms HCC resourcing for LLFA matters may also be covered in the proposed post-consent PPA as necessary, where not otherwise provided for in relation to any

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	point of the application being considered valid. Certain information will need to be submitted as detailed at.	consent application. It is noted the same timescales are provided for in the Southampton to London Pipeline DCO (Article 18(9))
37.	An amendment to 17 (6) is requested to ensure that any such works does not also reduce the capacity of the watercourse. The addition of 'Ordinary Watercourse' at the end of this paragraph is also sought.	All matters will be addressed in accordance with the consents required to be obtained, which as has been confirmed are not disapplied from being required in any way.
38.	Further detail is required in Article 17(7) to further define the acceptability of water quality to be discharged. The current drafting is too open for interpretation.	The Applicant does not consider the drafting is open to interpretation. The undertaker also notes the form of words used accords with that used in the Southampton to London Pipeline DCO (Article 18(6)) in relation to which HCC in their capacity as LLFA were interested.
39.	It is suggested that the reference to 'local authority' in paragraph 17 (9) is insufficiently precise in this context given the differing potential functions and roles of local authorities e.g. as Highway Authority, Local Planning Authority, Lead Local Flood Authority. The paragraph could also make reference to the consenting requirements of the Land Drainage Act.	An amendment in this regard is not necessary.. It is noted the same works appear in Article 18 of the Southampton to London Pipeline DCO without any further clarification.
APPENDIX 2 : Detailed Highway Authority Comments on the Assessment of Existing Highway Conditions		
A2.7	It should be noted that additional school/ college bus services exist in the area (primarily affecting South Downs College). Whilst these are not included in the above summary, the relevant institutions will need to be advised of the expected delays to their services.	Local educational institutions will be notified of works as per the communication strategy set out in the Onshore Cable Route Construction Impacts on *"Access to Properties and Car Parking and Communication Strategy"* which is included as Appendix 1 of the FTMS (REP1-068).
A2.10	Personal injury road accident data was obtained by the Applicant from Hampshire Constabulary in July 2019 and covers the 5-year period of Jan 2014 – Dec 2018. This data is too old and should be updated to be considered acceptable. It is noted that the extent of the study area is limited to the proposed route of construction traffic and near to the main route of the cable. The study area should be extended to include all diversion routes and routes anticipated to experience an increase in traffic as a result of the works. There should also be a particular focus on the construction traffic route from the A3 to Lovedean where HGVs and vehicle movements are anticipated to be significant.	Section 4 of the Supplementary TA (REP1-142) includes an updated analysis of Personal Injury Collision data for the Onshore Cable Corridor and wider study area, specifically the areas that will serve as likely division routes as result of the traffic management required to facilitate construction of the Onshore Cable Route. This analysis covers a wider area than the Transport Assessment (APP-448) and also an updated time period (1st October 2014 to 30th September 2019) to reflect the most recently available data.
A2.11	The accident data (in Appendix E) should be presented in such a way to make it more readable. For instance, all columns should be on one page and rows segregated into the route sections.	Accident data was requested from Hampshire Constabulary in a more readable format, however, the Applicant was informed this request could not be met and thus the data could only be provided in the pdf format which was been included in Appendix E. It should be noted that the accident data provided in the Transport Assessment (APP-448) has since been superseded by that included in the Supplementary Transport Assessment (REP1-142), whilst the superseding raw data has not been appended to the STA, this is available upon request.

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A2.12	No accident cluster analysis or route assessment has taken place. The following concerns have been identified after reviewing the submitted personal injury road accident data:	Analysis of clusters of collisions has been provided in the updated analysis of personal injury road collision data that was included in Section 4 of the Supplementary Transport Assessment (REP1-142).
A2.13	It is noted that two collisions involving pedestrians occurred outside Denmead Infant School, one of which included a child. A further two collisions involved cyclists, again with one involving a child. It is also noted that the causation factor for the latter incident was due to the vehicle travelling on the pavement. Whilst not explicitly stated, it can be reasonably be assumed this was due to a restricted road width. Consideration should be given to mitigating potential accidents at this location through the Construction Traffic Management Plan (CTMP).	Denmead Infant School is not located on a route permitted for use by construction traffic, or on the Onshore Cable Corridor, and as such will not be directly impacted by construction works. It could also be reasonably assumed that vehicles travelling on the pavement occurred due to school drop-off rather than as a result of restricted width on this link
A2.14	Hambledon Road is proposed to be impacted by both the cable installation along the road itself and as a diversion route during the closure of Anmore Road. Consequently further analysis of this route is required as the proposed restriction of the carriageway may exacerbate the concerns set out above	Anmore Road will require closure for 1 day only as detailed within the FTMS (REP1-068). Programme restrictions contained within the FTMS also prevent construction on Hambledon Road north of Soake Road during this period, thereby mitigating the cumulative impacts of construction taking place simultaneously at both locations
A2.15	There are a high number of incidents reported in this small area; 36 collisions including 10 involving cyclists and three with pedestrians. A cluster of incidents was identified at the Rockville Drive roundabout and at the pedestrian crossing on Maurepas Way however no quantum of collisions or narrative has been provided by the Applicant. An analysis of this, including mitigation proposals, is required to ensure appropriate mitigation for the likely impact of the proposed works at this location.	Section 4 of the Supplementary TA (REP1-142) includes an updated analysis of Personal Injury Collision data for the Onshore Cable Corridor and wider study area, specifically the areas that will serve as likely division routes as result of the traffic management required to facilitate construction of the Onshore Cable Route.
A2.16	It should also be noted that all incidents in this area (Zone 4) involving pedestrians were due to pedestrians crossing the carriageway. All efforts should be made to safely accommodate pedestrians during construction works to prevent the need to cross traffic.	As is stated in Section 2.5 of the FTMS (REP1-068), all road works will be undertaken in accordance with the following relevant guidance documents: • Traffic Signs Manual Chapter 8: Traffic Safety Measures and Signs for Roadworks and Temporary Situations (Department for Transport, 2009); • Safety at Streetworks and Roadworks: A Code of Practice (Department for Transport, 2013); and • New Roads and Street Works Act 1991: Code of Practice of Co-ordination of Street Works and Works for Road Purposes and Related Matters (Fourth Edition) (Department for Transport, 2012). Furthermore, as is stated in Section 2.9.2 of the FTMS (REP1-068), *'Where construction works do obstruct a footway a minimum unobstructed width of 1.0 m will be provided alongside the construction corridor and where this is not possible a safe alternative route will be provided. This will include provision of suitable crossing facilities where required, including temporary replacement of existing pedestrian crossings that may need to be closed to facilitate construction.'*
A2.17	The A3 has a significant proportion of incidents involving cyclists (13 out of the 40 accidents recorded in this area). Despite this, no proposal has been	As was stated above in answer to HCC point A2.16, all traffic management which is to be implemented in association with the Onshore Cable Route will be in accordance with the relevant

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	put forward to protect the high cyclist usage along this route. Details of mitigation should be provided regarding arrangements to avoid cyclists being suddenly forced into traffic leading to potentially dangerous occurrences.	guidance documents. As such, appropriate signage will be provided to inform cyclists of any temporary alterations to facilities.
A2.18	A cluster of incidents has been identified at the London Road/Bushy Mead junction. Unfortunately, no details or analysis has been undertaken of this, nor has any mitigation been proposed to prevent exacerbation of the situation.	Section 4 of the Supplementary TA (REP1-142) includes an updated analysis of Personal Injury Collision data for the Onshore Cable Corridor and wider study area, specifically the areas that will serve as likely division routes as result of the traffic management required to facilitate construction of the Onshore Cable Route.
A2.19	The Transport Assessment concludes that in most cases accidents are due to driver error. This conclusion is not accepted on the basis of the evidence as presented. Further analysis should be carried out to review whether there are any patterns of accidents which would be exacerbated by construction of the proposals.. Where accident patterns may be exacerbated due to reassignment of traffic as a result of construction, mitigation may be required.	Section 4 of the Supplementary TA (REP1-142) includes an updated analysis of Personal Injury Collision data for the Onshore Cable Corridor and wider study area, specifically the areas that will serve as likely division routes as result of the traffic management required to facilitate construction of the Onshore Cable Route. This analysis covers a wider area than the Transport Assessment (APP-448) and also an updated time period (1st October 2014 to 30th September 2019) to reflect the most recently available data.
APPENDIX 3: Detailed Highway Comments on the Transport Impact Assessment		
A3.13	The link capacity assessment has been further categorised into a RAG (red, amber, green) assessment. Green indicates that the link is an appropriate diversion, amber highlights that the link can accommodate the forecast flows but is not wholly appropriate and red means that the link is not acceptable. From the links that have been assessed, Closewood Road is the only link within Hampshire's road network to be classed as unsuitable as a diversion route owing to the rural road's narrow width. It is understood that the link is only likely to be affected for approximately 2-3 weeks of the construction programme. As such, suitable measures should be put in place at this time to redirect traffic away from using Closewood Road as an alternative route.	The Applicant notes the comment regarding Closewood Road and will consider the provision of suitable mitigation measures within the FTMS (REP1-068).
A3.20	It is noted that the SRTM is expecting high levels of traffic to be diverted through the Rockville Drive arm of the roundabout. Given the anticipated level of traffic during the construction period, the situation at this roundabout should be monitored carefully throughout the construction period and alternative routes identified and directed towards as appropriate.	The Applicant notes this comment and welcomes further discussions with HCC regarding a suitable signage strategy.
A3.21	The Dell Piece East (A3(M) Junction 2 roundabout) is modelled close to design capacity on the A3(M) S arm under both the Do Something 1 and Do Something 2 scenarios respectively, with a forecast ratio over capacity of 0.98 and 0.97. Given the junction's proximity to the strategic road network, both the A3(M) (S) and A3M (N) approaches should be closely monitored and potentially reassessed for their suitability for redirected traffic during construction to ensure that no queuing occurs back onto the A3(M).	The Applicant is currently in discussions with Highways England on the acceptability of the anticipated impact at this junction. Information will be shared with HCC as soon as it becomes available.

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A3.23	Similarly to A3(M) Junction 2, A3(M) Junction 3 is forecast to be at capacity on the A3(M) N approach in the PM peak under the Do Minimum Scenario, with a ratio of flow to capacity of 1.00. This drops to 0.99 when assessed under the Do Something 1 and Dom Something 2 scenarios.	The Applicant is currently in discussions with Highways England on the acceptability of the anticipated impact at this junction. Information will be shared with HCC as soon as it becomes available.

A3.24	The Applicant has stated that the forecast level of queuing can be accommodated on the slip road, causing no blocking back onto the A3(M). This situation should be monitored during construction to ensure that the queuing does not increase above that which has been modelled and potentially blocking back onto the A3(M). The views of Highways England should be sought in this regard, including their views on the information submitted relating to potential queue lengths on slip roads	The Applicant is currently in discussions with Highways England on the acceptability of the anticipated impact on the A3(M). Information will be shared with HCC as soon as it becomes available. The Applicant is also liaising with Highways England regarding a Statement of Common Ground (REP1-104) regarding impact of the Proposed Development at A3(M) Junction 2 and 3.
		
		It is not appropriate for the Applicant to monitor the operation of these junction during the construction period. However there are Protective Provisions included within the dDCO (APP-019) to allow unforeseen circumstances to be responded to. This is summarised in Section 2.13 of the FTMS (REP1-068) as follows:
		
		• Paragraph 10 of the protective provisions for the protection of the highway provides the ability for the highways authority to provide directions in relation to the works:
		  ○ Where an emergency occurs or where necessary to secure the safety of the public;
		  ○ Where works are being carried out in a manner which constitutes or likely constitutes a danger to any person or class of persons or to affect the stability or integrity of any structures or apparatus including the public highway; and
		  ○ Where, as a consequence of unforeseen circumstances, in the reasonable opinion of the relevant highway authority any part of the works being carried out or to be carried out within the public highway are causing or are likely to cause serious disruption to traffic that will endanger the safety of the public.
		• Paragraph 4(2) of the protective provisions for the protection of the highway provides for any detailed traffic management strategy to be revised where necessary in the event of unforeseen circumstances.

A3.26	The Stakes Hill Road roundabout is due to be upgraded as part of the offsite occupation triggers associated with the West of Waterlooville Urban Extension/MDA (Havant Borough Council's planning permission reference APP/10/00828). It is uncertain whether the junction improvements will be in place before or during the construction of the cable route. Best endeavours should be made to ensure that the works are co-ordinated to prevent any additional delays than those forecast under the ARCADY assessment.	Discussions have been held between the Applicant and Grainger Plc; the developers of the West of Waterlooville site. A draft Statement of Common Ground (SoCG) has been agreed between the Applicant and Grainger Plc (REP1-115) submitted at Deadline 1. Included within Section 4.1.3 of the SoCG is an agreed statement regarding the liaison which shall occur between the Applicant and Grainger Plc with reference to the phasing of highway works required to serve the West of Waterlooville development site.
A3.28	Along with the junctions referenced above, the situation at the roundabout should be monitored, with appropriate changes to the diversion route made should the capacity of the junction worsen above that which has been forecast.	It is not appropriate for the Applicant to monitor the operation of these junction during the construction period. However there are Protective Provisions included within the dDCO (APP-019) to allow unforeseen circumstances to be responded to. This is summarised in Section 2.3 of the FTMS (REP1-068) as follows: • Paragraph 10 of the protective provisions for the protection of the highway provides the ability for the highways authority to provide directions in relation to the works: ○ Where an emergency occurs or where necessary to secure the safety of the public;

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		○ Where works are being carried out in a manner which constitutes or likely constitutes a danger to any person or class of persons or to affect the stability or integrity of any structures or apparatus including the public highway; and ○ Where, as a consequence of unforeseen circumstances, in the reasonable opinion of the relevant highway authority any part of the works being carried out or to be carried out within the public highway are causing or are likely to cause serious disruption to traffic that will endanger the safety of the public. • Paragraph 4(2) of the protective provisions for the protection of the highway provides for any detailed traffic management strategy to be revised where necessary in the event of unforeseen circumstances.
A3.29	The temporary operation of a number of junctions affected by the rediversion of existing traffic during the construction of the cable route has been assessed above. While it is noted that this is a temporary situation, these junctions should be monitored during construction to ensure that their associated capacities are not worsened further than modelled within the Transport Impact Assessment. Should the operation of these junction during construction be worse than that forecast, remedial solutions should be implemented. Further information should be provided by the Applicant regarding potential remedial solutions in order to support this application.	The Applicant notes the comments regarding traffic capacity but notes that the traffic modelling completed within the Transport Assessment (APP-448) is robust. included a robust scenario that cannot be replicated due to the programme constraints contained within the FTMS (REP1-068) . It is not appropriate for the Applicant to monitor the operation of these junction during the construction period. However there are Protective Provisions included within the dDCO (APP-019) to allow unforeseen circumstances to be responded to. This is summarised in Section 2.3 of the FTMS (REP1-068) as follows: • Paragraph 10 of the protective provisions for the protection of the highway provides the ability for the highways authority to provide directions in relation to the works: ○ Where an emergency occurs or where necessary to secure the safety of the public; ○ Where works are being carried out in a manner which constitutes or likely constitutes a danger to any person or class of persons or to affect the stability or integrity of any structures or apparatus including the public highway; and ○ Where, as a consequence of unforeseen circumstances, in the reasonable opinion of the relevant highway authority any part of the works being carried out or to be carried out within the public highway are causing or are likely to cause serious disruption to traffic that will endanger the safety of the public. • Paragraph 4(2) of the protective provisions for the protection of the highway provides for any detailed traffic management strategy to be revised where necessary in the event of unforeseen circumstances.
A3.30	Any longer-term impact on sustainable modes of transport must be understood. Appropriate mitigation must be in place to ensure there is no detrimental impact in terms of a reduction in sustainable transport modes, or conversely an increase in private car use.	There will be no long-term impact on sustainable modes as the construction period is temporary and all highway surfaces will be reinstated to a suitable standard. The STA (REP1-142) Section 6 comprises a detailed bus journey times assessment, which analyses the difference between bus journey times across the study area by using a comparison of Do Minimum and the two Do Something scenarios contained within the SRTM. Overall, this assessment concludes that the works will generally have a minor impact on bus routes across the study area and where this is more pronounced, the impact will be limited to a short-time period. Furthermore, a meeting was held with First Group (First Hampshire & Dorset) on the 22nd August 2019 to discuss the Proposed Development and the potential impact to local bus services in the Portsmouth and South Hampshire area. A further meeting was held on 8th October 2020. The Minutes of this meeting have been issued to First Group for approval and will be shared with HCC

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		as soon as possible. At this meeting, First Group noted the anticipated construction programme but noted that the FTMS (REP1-068) appeared to be comprehensive and well planned. No request was made to the Applicant regarding requirements for additional services to mitigate the impacts of construction. At pre-submission an attempt was also made to consult with Stagecoach on the Proposed Development, but no response was received. Since submission, further contact has also been made with meeting arranged for Wednesday 21st October. The Applicant will share the outcomes of this meeting with HCC as soon as possible.
A3.32	On-road cable route construction activities will damage the appearance and potentially the effectiveness of the following sustainable transport options and complimentary infrastructure located within the construction envelope: • Bus lanes • Bus stops and shelters • Footpaths • Cycle lanes • Cycle parking • Pedestrian and cycle crossing facilities • Street furniture (street lighting, signage, benches) • Green verges; and • Utility apparatus	This comment is noted but considered to be without foundation given the requirements provided for by DCO require reinstatement of the condition of the highway and any street furniture removed. This is secured by virtue of the application of NRSWA 1991, and also through the protective provisions for the protection of highways and traffic.
A3.33	The Applicant has not submitted any evidence of discussions with bus operators. This will be required to determine the acceptability of relocated bus stops, the proposed diversions routes, the anticipated delays to services and the expected resultant loss in patronage. Ongoing consultation and close working between the Applicant and operators of local bus services along the corridor will also be required during the construction phase to minimise the impact on bus service timetables and the number of additional buses and drivers required to operate services. These services are likely to need to be modified for the duration of construction activities	A meeting was held with First Group (First Hampshire & Dorset) on the 22nd August 2019 to discuss the Proposed Development and the potential impact to local bus services in the Portsmouth and South Hampshire area. A further meeting was held on 8th October 2020. The Minutes of this meeting have been issued to First Group for approval and will be shared with HCC as soon as possible. At this meeting, First Group noted the anticipated construction programme but noted that the FTMS was comprehensive and well planned. No request was made to the Applicant regarding requirements for additional services to mitigate the impacts of construction. At pre-submission an attempt was also made to consult with Stagecoach on the Proposed Development, but no response was received. Since submission, further contact has also been made with meeting arranged for Wednesday 21st October. The Applicant will share the outcomes of this meeting with HCC as soon as possible
A3.34	If no extra buses and drivers are provided (i.e. the existing peak vehicle requirement is maintained) then the bus service reliability will likely decline and some existing bus users are likely to change to alternative modes of transport resulting in a loss of bus passengers and associated revenues during, and potentially beyond the construction phase.	Please see response to 3.33. This statement is not agreed with. The FTMS is considered appropriate to mitigate impacts on the highway whilst construction is ongoing.
A3.35	It is therefore a reasonable expectation that the Applicant will provide support to cover the aforementioned bus service-related costs. This should be through	Please see response to 3.33. The request for any Section 106 contributions at this time is without justification at this time.

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	a service level agreement between operators and the Applicant, ideally secured via a S106 Agreement.	
A3.36	During the installation of the cable on highway land, pedestrian routes are likely to be hindered due to footway width restrictions, closures and diversions. Where possible, pedestrians should be able to continue their journey without the need to cross a road to avoid works. Consideration should also be given to pedestrians with particular restrictions on their mobility. The proposed route also crosses a number of bridleways used by horse-riders.	Section 2.9 of the FTMS (REP1-068) states that where construction works do obstruct a footway a minimum unobstructed width of 1.0 m will be provided alongside the construction corridor and where this is not possible a safe alternative route will be provided. This aligns with Traffic Signs Manual Chapter 8 requirements for temporary pedestrian routes. In some locations, a footway closure may be required without a suitable alternative route being available nearby or on the opposite side of the carriageway. In these instances, a pedestrian route will be provided within the carriageway with a minimum unobstructed width of 1.0 m, albeit this will be wider where it does not impact on traffic flow.
A3.37	Along the onshore cable route, there are three main means for cyclists to travel: on-road, shared use footway and dedicated on-road cycle/bus lanes. Each of these means will need to be managed to avoid cyclists being suddenly forced into adjacent traffic and/or pedestrians. It is noted that the diversion route along Stakes Hill Road will also impact on Sustrans National Cycle Route 222.	As stated in Section 2.9 of the FTMS (REP1-068), where there are shared-use paths or cycleways impacted by the works these will be kept open if possible, or a suitable diversion route provided. Where full closure of cycle route is necessary and diversion routes are unsuitable temporary cycle facilities will be provided past the construction corridor where possible. This could be completed as part of a full lane closure or through provision of a temporary off-road route. The width of these temporary routes will be 2.5 m where possible, with a minimum of 1.5 m. If the temporary route is provided over unmade ground, then footway boards will be used to provide a formal surface. Section 2.9 of the FTMS (REP1-068) states that in some cases, it may be required to narrow a shared-use path past the construction corridor to a width that is not suitable for cycle use (I.e. 1.0 m). In these circumstances 'Cyclists dismount and use footway' signs will be used as a last resort, noting that this would only be completed for one 100 m section at a time. Where road closures are required for construction of the Onshore Cable Route cycle access will be maintained at all times.
A3.38	It is considered that due to the time and scale of the works, there will be a significant impact on the attractiveness of utilising the public rights of way and other foot/cycle networks. This is likely to result in a modal shift to other, potentially less sustainable means. Mitigation of this impact should be explored further by the Applicant.	The Applicant does not agree with his statement given that construction of the Onshore Cable Route will be completed in 100m sections and mitigation of impacts on pedestrian / cycle networks is included within the FTMS (REP1-068). Further information on the assessment of impacts on the Public Rights of Way network is included within ES Addendum Appendix 14 – Note on PRoW, Long Distance Walking Paths and Cycle Route Divisions (REP1-145). In all cases, PRoW impacted by the Onshore Cable Route will be provided with suitable diversion routes to maintain access at all times.
APPENDIX 4 :Submission requirements for construction approvals		
APPENDIX 5: Detailed Highway Comments on the Converter Station Site Access		
1	Swept path analysis is required for all expected highway movements at the proposed junction both during and post construction. This should include the largest articulated vehicle which is proposed within the Transport Assessment to enter the site both during and post construction. Tracking should be	Further information on the proposed access junction is included in Section 3.3 and Appendix C of the Supplementary Transport Assessment (REP1-142). As required by HCC this includes all relevant swept path assessments for manoeuvres that will be permitted at the site access junction.

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	indicated towards the haul road, both entering and egressing the site as well as for right in/left out movements from Broadway Lane.	
2	Confirmation is needed that the land required for the construction of the proposed haul road is within the Applicant's ownership as it falls outside of the redline for the development.	The haul road, and land required to facilitate construction of the haul road, falls within the confines of the Order limits.
3	Demonstration is required that sufficient visibility to the south from the site access can be achieved and appropriately secured in perpetuity. This should be based on the recorded speeds along Broadway Lane. Should provision of this visibility be restricted, a further speed check in the vicinity of the semidetached farm cottages is required to confirm measured speeds in a location appropriate to the end of the visibility splay. Should these measured speeds not accord with the achievable visibility, a 'Departure from Standards', would be required; this is a separate process and approval and is not guaranteed. Should a Departure from Standards be required, formal undertaking of the Departure from Standards process should be completed prior to planning approval in order to ensure the access proposals are deliverable.	Further information on the proposed access junction is included in Section 3.3 and Appendix C of the Supplementary Transport Assessment (REP1-142). A speed survey completed on Broadway Lane south of the access junction in June 2020 has concluded that the achievable visibility splays accord with measured traffic speeds. The approval process for this access is to be via the DCO.
4	It is noted that in order to achieve an appropriate visibility splay to the north, hedgerow removal is required. It appears only a small section of the existing hedge around the sharp bend at the junction of Day Lane/ Broadway Lane will remain. The complete section should be removed and replaced clear of the visibility splay, subject to an assessment demonstrating that the landscape impact is acceptable. If the replacement hedge is less than the existing a CAVAT (Capital Asset Value for Amenity Trees) payment may be required to mitigate the loss of the highway asset.	Further information on the proposed access junction is included in Section 3.3 and Appendix C of the Supplementary Transport Assessment (REP1-142). This includes WSP Drawing No. AQD-WSP-UK-OS-DR-Z-200215, Rev 04, on which it is noted at the Day Lane/Broadway Lane junction that "*Area within visibility splays to be cleared of vegetation and dedicated as Highway*". As is stated in paragraph 3.3.2.4. of the Supplementary Transport Assessment, the power to carry out vegetation cutting back is provided for at Article 41 (Felling or lopping of trees and removal of hedgerows) of the draft Development Consent Order (REP1-021). Mitigation planting for tree and hedge loss will be secured through Requirement 7 of the dDCO (APP-019) which requires a detailed landscaping scheme includes specific reference to the location, species, size, planting protection measures and planting density of any proposed planting. The detailed landscaping scheme will require approval from the discharging authority in consultation with HCC.
5	Movements left from the site access are to be physically restricted to ensure use of the proposed haul road for large vehicles. The northern radius of the proposed access should therefore be reduced to 4-6m to accommodate small vehicles only post construction.	All HGV movements to and from the Converter Station will be completed under the supervision of banksmen, who will manage vehicles to and from the haul road and prohibit vehicles from turning left on Broadway lane. The strategy for managing HGVs at the Converter Station during the construction period is detailed in Section 6.2 of the FCTMP(REP1-071).
6	No construction traffic, including contractor's vehicles, should use Broadway Lane to the south of the proposed access. The junction design should discourage egressing vehicles from turning right by including amendments to junction geometry and no right turn signage within the required updated access drawings. A TRO will be required to prevent right turn movements from the site access and should be secured within the DCO.	All HGV movements to and from the Converter Station will be completed under the supervision of banksmen, who will manage vehicles to and from the haul road and prohibit vehicles from turning left on Broadway lane. The strategy for managing HGVs at the Converter Station during the construction period is detailed in Section 6.2 of the FCTMP(REP1-071).

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		For the operational stage, the following amendments have been incorporated into the access junction design to discourage vehicles from entering and exiting the Converter Station from the south: • A 'no right turn' sign will be placed on the Converter Station access approximately 10m from the junction with Broadway Lane to inform drivers that this movement is prohibited; and • The radii on the southern side of the access road has been reduced from 10m to 1m to prevent vehicles from turning left into the Site from Broadway Lane. Further information on the proposed access junction is included within Section 3.3 and Appendix C of the Supplementary Transport Assessment (REP1-142).
7	To ensure that material is not dragged from the haul road onto the highway, confirmation has been sought as to whether the haul road will be metalled. At a minimum the section between Day Lane and Broadway Lane, along with the first 50m within the site, will be required to be of full metalled construction to reduce the risks of mud and debris being taken onto the highway. Appropriate wheel washing facilities will also be required and secured within the CTMP.	The FCTMP (REP1-071) states in section 3.7 that wheel washing facilities will be provided where required and public roads in the vicinity will be monitored to ensure that they are not contaminated with debris that could become a hazard and will be required to have road sweeping arrangements on call. The FCTMP is secured via Requirement 17 of the DCO (REP1-021).
8	A Stage 1 Road Safety Audit of the updated/ revised proposals is required.	The Applicant agrees that a Road Safety Audit (RSA) should be completed for the Converter Station access junction. However, given the revised proposals submitted within Appendix C of the Supplementary TA (REP1-142) represents an update from the Transport Assessment (APP-448) the Applicant welcomes further comments from HCC on the proposals prior to completion of the RSA.
APPENDIX 6: Details of Planned Highway Works		
A6.1	A number of highway improvement schemes within the cable laying route have been identified and these are as follows: • Resurfacing of the A3 corridor between a position north of Campbell Crescent to a location south of Ladybridge roundabout as shown on plan H677/01 attached. • A3 Ladybridge roundabout provision of the southern access to the West of Waterloville urban extension/Major Development Area demonstrated in drawing number GTWVILLE_SA/GA/01 Rev J. These are third party works currently undergoing the Section 278 design check process with the Highway Authority. As part of the planned improvement scheme to the Ladybridge roundabout, secured through the access strategy for the development, the existing culvert will need to be bridged and this will involve piling. To avoid the need to alter the works being undertaken to the culvert, the Applicant will be required to route the cable underneath this area of the network. A sufficient exclusion zone will need to be provided around the culvert to ensure that any replacements works can take place unimpeded. The redline around Ladybridge roundabout is extensive and may have implications for planned and future works at this	The Applicant will seek to work with HCC so that the delivery of the Proposed Development is co-ordinated with the delivery of the improvement works associated with the Waterlooville Major Development Area, taking into account the programme mitigations provided for within the FTMS and the need to deliver the works efficiently so as to minimise impacts.

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	junction. The acceptability of cable laying around this junction must be considered in the context of these projects. • Emerging Transforming Cities Fund (TCF) schemes for rapid bus corridor improvements to the A3 in the vicinity of Ladybridge Roundabout • West of Waterlooville Urban Extension/Major Development Area Phase 8 construction access as shown in drawing number GTWVILLE_P8/GA/01 Rev E. • Milton Road/Lovedean Lane junction works to convert to a mini roundabout in relation to the approved Woodcroft Farm application (planning reference APP/13/00804). These works sit along the proposed construction route to the converter station and are demonstrated below in drawing number 21834-004-SK001 Rev A.	
A6.2	Through the ongoing monitoring of the integrity of the highway surface there are a number of emerging locations where resurfacing may be required within the lifetime of this project. This includes: • A3 London Road, Widley • Charlesworth Drive to Milton Roundabout; and • A3 adjacent Forest End.	See A6.1
A6.3	In addition to these works there are planned Section 278 works off the cable route, but which will be affected by redistributed traffic: • Stakes Road/ Stakes Hill Road roundabout conversion to traffic signals. • Duelling Purbrook Way between College Road and Stakes Road Roundabout.	See A6.1
A6.4	The emerging Havant Borough Local Plan has identified a site (proposed allocation reference H41) on College Road for significant residential development which will require improvements to the local highway network, including the following junctions: • Stakes Road/Stakes Hill Road roundabout • A3(M) junction 4 dumbbell roundabouts • College Road/ Purbrook Way junction; and • Crookhorn Lane/ Portsdown Hill Road junction.	See A6.1
A6.5	A planning application (reference APP/19/01101) has recently been submitted for development on this site and modelling work by the Applicant for this site will be required to understand the extent of junction improvements required. The form of these improvements is therefore still being considered.	See A6.1
APPENDIX 7 : Detailed Comments on the Framework Construction Management Plan and Traffic Management Strategy		
A7.4	It is noted that 'alterations to the highway to enable construction including temporary and permanent' is stated as an item for inclusion in Construction	At this stage it is not possible to confirm the exact location of temporary access junctions within the Order Limits as these will dependent upon the final alignment of the Onshore Cable Route which will

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	Traffic Management Plans to be provided at a later date. However, it is deemed necessary by Hampshire County Council that in order to determine the suitability of any proposed permanent, or significant temporary, alterations to the highway should be provided for review at this stage.	be confirmed during detailed design. As a result the Applicant is preparing a "Construction Access Standard Detail Document" to provide a layout for all construction access locations and the design criteria which will need to be met. The Applicant welcomes the views of HCC on this document in due course.
A7.5	Discussions should be held with the emergency services regarding how the additional congestion/ queuing may impact on response times for emergency vehicles.	Please see the Applicant's response to EXA WQ1 TT1.16.27 (Doc Ref 7.4.1). As per TT 1.16.2, relevant emergency services are satisfied with the consultation to date and the mitigation proposed in respect of traffic impacts.
A7.7	Sensitive receptors such as schools and medical facilities have been identified as part of the Framework Construction Traffic Management Plan, however the Queen Alexandra Hospital, police stations and fire services, residential properties and other rights of ways appear to have been omitted and should be included.	The Applicant notes this comment and agrees that Queen Alexandra Hospital, Waterlooville Fire Station, Waterlooville Police Station and relevant Public Rights of Way will be added as sensitive receptors within the FCTMP (REP1-071). The mitigation of impacts on sensitive receptors including residential properties is adequately covered through the consideration of construction traffic routing and timing restriction contained within the FCTMP (REP1-071).
A7.8	The primary compound will be located at the Lovedean converter station with satellite contractor compounds and laydown areas along the Onshore Cable Corridor. The specific locations and layouts of these areas should be agreed with the Highway Authority, and Hampshire County Council Countryside Services in relation to Horndean Footpath 4 as part of the Construction Traffic Management Plan for that section.	The contractor's compound will be located at the proposed Converter Station Area. To facilitate construction, temporary Laydown Areas may be created at Joint Bay locations to store materials such as cable ducting and arising from the works. The need for this will be confirmed as part of detailed designs completed by the appointed Contractor. Further information on the assessment of impacts on Horndean Footpath 4 is included within Section 1.2 of ES Addendum Appendix 14 – Note on PRoW, Long Distance Walking Paths and Cycle Route Divisions (REP1-145). Satellite compounds are no longer to be provided, with the main compound used in addition to sustainable travel measures, as outlined in the FCTMP (REP1-071).
A7.9	Two compounds are proposed for the materials and staff required for the cable routing. The compound impacting on Hampshire's highway network is at the Lovedean site. Further information is required regarding site selection for a compound at Lovedean. This compound is remote from the majority of cable laying works, in particular, the A3 corridor, resulting in additional impact on the Lovedean area which may not be necessary.	See A7.8
A7.10	In addition, the impacts of construction worker movements do not appear to have been assessed in terms of the number of movements to and from the site. Confirmation of the maximum number of 'gangs' working from each compound is required (set out within the summary as an 'assumed' maximum number of three) and included within the assessment of the number of trips to and from the Lovedean site.	All assessments of the Converter Station contained within the Transport Assessment (APP-448) and ES Chapter 22 (APP-137) have included construction worker traffic movements while further assessments have also been completed within the Supplementary Transport Assessment (REP1-142). As detailed within the FCTMP (REP1-070), the Converter Station will act as the main compound for all construction workers associated with construction of the Onshore Cable Route.

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A7.15	Construction workers undertaking the onshore cable installation are proposed to arrive at a compound on the converter station site prior to the start of each shift. All 'gangs' will then travel to their respective works from this location and return at the end of the day. As stated in 3.4.2.1 of the Framework Construction Traffic Management Plan, no construction traffic will use the route from the south via Anmore Lane. A requirement within the DCO will be needed to ensure a ban on right-turn movements out of the converter station access onto Broadway Lane, and the proposed access junction will need to be designed accordingly.	The Converter Station site access junction now incorporates proposals to prohibit vehicles from turning left in and right out of the site. Further information on the proposed access junction is included within Section 3 and Appendix C of the Supplementary Transport Assessment (REP1-142). The CTMP (REP1-070) also includes prescribed routes for construction traffic, which excludes the use of Anmore Lane south of the Converter Station.
A7.16	The Transport Assessment assumes a car occupancy of 1.2 persons per vehicle (referred to as the standard rate for commuting trips) which results in a forecast of 125 movements a day to and from the site. Census 2011 data has been used to determine the origin and destination of workers.	This is an error. All assessments assume that construction workers have a car occupancy of 1.0, therefore generating 150 vehicle movements associated with construction of the Converter Station. In addition, 56 construction workers associated with construction of the Onshore Cable Route have been assumed to use the Converter Station as their main construction compound. Further information is included within Section 3 of the Supplementary Transport Assessment (REP1-142). Section 7 of the Framework Construction Worker Travel Plan proposes that, as an average across the work force, car park permits will be limited to one permit per 1.5 workers.
A7.18	It is not mentioned how workers will travel from the converter station to each of the work locations. The benefits of this arrangement are also unclear, as there will be a significant level of trips to the converter station and then again from the converter station to the work locations, with the reverse being the case in the evening peak. Provision of a shuttle service to sustainable transport hubs is mentioned, but no further details have been provided.	Additional information on construction worker travel to and from the Converter Station is included in Section 3 of the Supplementary Transport Assessment (REP1-142), Section 4 of the FCTMP (REP1-071) and Construction Worker Travel Plan (Appendix 6 of the FCTMP). Minibuses / construction LGVs will be provided to transport staff to sites as required from the construction compound at the Converter Station. The shuttle bus service will be operated between the Converter Station Area and nearby locations to reduce the requirement for construction workers to travel to site by private vehicle. The operation of this shuttle bus service will be kept under review for the construction period but at this stage it is assumed that it would provide pick-up and drop-off to the following locations: • Havant Railway Station (which provides links from London, Chichester, Portsmouth and Southampton); • Waterlooville town centre (which acts as a terminus for a number of local bus routes); and • Local hotels used for accommodation by construction workers.
A7.19	Some works locations are a substantial distance from the converter station, and it is suggested that more appropriate locations for workers to meet are explored (e.g. Farlington or the West of Waterlooville Major Development Area). If construction worker gangs are to commute individually to the works locations the parking impact at each site will need to be addressed. In conjunction with this, the necessity of initially commuting to the substation is questioned.	Whilst construction staff will generally start and end their day at the Converter Station compound and travel to construction location via Minibuses / construction LGVs, it will also be possible for construction workers to be picked up by these vehicles from local accommodation on-route wherever practicable. This arrangement is included within Section 4 of the FCTMP (REP1-071).

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A7.20	The Transport Assessment stated that all workers and HGV's will originate from the converter station (Section 1.8.3.4.). This operation will result in constructions workers and HGV's attempting to return to the converter station during peak periods, which should be avoided. It is also noted that no avoidance of the school PM peak is considered.	Further information on the return of construction traffic to the Converter Station is included within Section 3 of the Supplementary Transport Assessment (REP1-142). HGV construction traffic movements will be timed to avoid the AM (08:00-09:00) and PM (17:00-18:00) peak hours, with further consideration for other sensitive receptors (such as schools) required as part of detailed CTMP documents in accordance with Section 3.3 of the FCTMP (REP1-071). Some non-HGV construction traffic movements may occur at the Converter Station Area between the hours of 17:00 to 18:00 (the PM Peak) as follows: • 12 non-HGV construction vehicles returning to the Converter Station Area from the six construction locations along the Onshore Cable Corridor (two vehicles per site) between 16:00 and 17:00 may arrive at the Converter Station after 17:00 if delayed on route; and • Up to 42-48 construction worker car trips exiting the Converter Station Area at the end of their working day associated with workers on the Onshore Cable Route leaving the site.
A7.21	The proposed working hours for the site, and therefore the period of time construction traffic movements, are expected to be between 07:00 and 19:00 Monday to Friday with movements spread evenly across the day with the exception of HGV's which will avoid the peak hours of 08:00-09:00 and 17:00-18:00. Analysis of traffic data is required to confirm the peak periods, which may need to be extended. Furthermore, it is noted extended working hours and night working may be required in certain locations and the DCO must not restrict these timing requirements.	Further to this comment, the Applicant has reviewed Automatic Traffic Count data collected in June 2018 and July 2019. This has confirmed that 08:00-09:00 and 17:00-18:00 are the peak traffic hours on the parts of HCC's highway network that are used as construction traffic routes (i.e. they are within the FCTMP (REP1-070) or affected as part of the Onshore Cable Route). This data can be provided to HCC if required.
A7.22	These time restriction requirements will need to be considered in conjunction with the local planning authorities. Stringent restrictions on movements may need to be applied along both the cable route and diversion routes due to the sensitive nature of parts of the route or the presence of schools requiring school drop off and collection hours to be restricted with regards HGV movements. Clarification is also required on how these proposed restrictions on HGV movements will be enforced and details of these measures need to be provided and agreed.	HGV construction traffic movements will be timed to avoid the AM (08:00-09:00) and PM (17:00-18:00) peak hours, with further consideration for other sensitive receptors (such as schools) required as part of detailed CTMP documents in accordance with Section 3.3 of the Framework CTMP (REP1-071) Details on enforcement of HGV movements is included within Section 8 of the FCTMP.
A7.23	Horizontal Direction Drilling (HDD) works movements are proposed to be restricted outside of 0800-0900 and 1700-1800 unless there is an emergency, however what constitutes an emergency is not made clear in the submission and should be clarified and agreed.	HGV movements only are restricted between the hours of 0800-0900 and 1700-1800. Loss of drilling fluid and subsequent collapse of the bore is considered to be an emergency, the mitigation for which would be the immediate delivery of a water via a tanker.
A7.24	The location of the construction works will at times require the displacement of existing on-street parking, but no analysis of quantum, displaced location or duration has been undertaken and should be considered.	Included in Appendix 1 of the FTMS (REP1-068) is the Onshore Cable Route Construction Impacts on Access to Properties and Car Parking and Communication Strategy. This provides specific consideration to the impacts of construction of the Onshore Cable Route upon parking and driveway access for residential properties, businesses and car parks located within of immediately adjacent to the Onshore Cable Corridor.

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A7.25	Section 1.9.2.2. indicates smaller plant can be used to reduce the impact on the local highway network, although it is not made clear why this practice is not used as standard. Further justification should be given as to why the larger plant is used at the detriment of highway users.	Smaller plant will only be used where it is not practicable to use larger plant, namely in areas with limited construction space / pinch points. Using smaller plant as standard practice would cause lack of productivity resulting in the scheme not being able to be delivered within the indicative timescales.
A7.26	As part of the method statements for the works locations, it is necessary for debris/mud overspill onto the highway to be mitigated at every location. A system to prevent material migration and cleaning of the highway for each site should be included and secured within the CTMP.	Paragraph 3.7.1.3 of the FCTMP (REP1-070) states that wheel washing will be provided where required and public roads in the vicinity will be monitored to ensure that they are not contaminated with debris that could become a hazard and will be required to have road sweeping arrangements on call.
A7.27	Should any junction used by construction traffic be found to require widening then, being temporary, such works should be covered via a S171 licence and agreed with by the Highway Authority. If the developer will not commit to adhering to Hampshire County Council's S171 licence procedure, requirements will need to be included in the DCO to ensure works are designed, constructed and the Highway Authority's fees are funded appropriately.	Any such amendments will be made via the powers included in the DCO. To require a process outside of this to be followed fundamentally undermines the benefit of the DCO and the purposes of the Planning Act 2008 regime.
A7.28	Weekly surveys are proposed detailing the condition of the highway network affected by the construction activities. This should include signed diversion routes and routes experiencing increased traffic as a result of redistribution of traffic. A comprehensive pre-condition survey of all impacted routes should be completed and submitted to the Highway Authority prior to commencement of any development. A commitment should be provided to not only immediately rectify hazardous deterioration (as provided within the CTMP) but also remedial measures to ensure the highway is not negatively impacted following completion of construction activities.	The Applicant does not agree that highway condition surveys are required on all signed diversion routes and routes experiencing increased traffic as a result of the redistribution of traffic. This is because of the temporary nature of any increases in traffic flows associated with construction of the Onshore Cable Route. Pre-construction condition surveys are provided for in the protective provisions for the protection of highways and traffic, which we look forward to HCC engaging with.
A7.29	The level of forecast vehicle movements, and in particular daily HGV movements, is of a scale which means that parts of the route, particularly closest to the converter station, is unlikely to be of a construction standard sufficient to accommodate these vehicle loading levels. This is likely to result in the failure of the highway surface along the construction traffic routes. The Applicant must examine this matter further and commit to suitable mitigation measures to ensure the Highway Authority is not left with a maintenance burden at the expense of the public and that the highway remains in a safe operational condition both during and beyond the construction period.	Proposals for the completion of highway surveys on construction traffic routes are contained in the FCTMP (REP1-071).
A7.30	It is stated that all temporary and permanent site accesses will be designed to the relevant standards. As the proposals include the formation of a new access onto the highway, which will include works within the highway, these works will be required to be secured appropriately through the DCO, ideally through the provision for the developer to enter into the Highway Authority's S278 process.	The provision of accesses is to be provided by the DCO. To require a process outside of this to be followed fundamentally undermines the benefit of the DCO and the purposes of the Planning Act 2008 regime. Further to recent discussions with HCC The Applicant is preparing a "Construction Access Standard Detail Document" to provide a layout for all construction access locations and the design criteria

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		which will need to be met. The Applicant welcomes the views of HCC on this document in due course. The Applicant will discuss any required amendments to the dDCO in this regard with the authority.
A7.32	A section should be included which references national and local policy documents relevant to the Travel Plan. This section should also reference the Applicant's policies on sustainable travel. If the Applicant does not have a policy on sustainable travel, a statement of support for the aims of the Travel Plan from a senior member of staff at AQUIND Ltd would suffice. The planning reference should be included in Section 1.	The Framework Construction Worker Travel Plan (Appendix 6 of the FCTMP (REP1-070) is considered to be adequate to confirm what is required. It is not clear what benefit HCC considers this would derive.
A7.33	Generally, the measures as laid out in Section 5 are appropriate for the FCWTP. However, there are a few additional measures which should be considered for inclusion: Cycling • Temporary showers, changing facilities and lockers (if not already included in the application) • Minor repair tools and resources (puncture repair kits, pumps, etc) Public Transport • Employers can consider provision of interest free loans to purchase season tickets for travel by bus or train (up to £5000 can be provided without tax implications) • Guaranteed ride home for staff and contractors in emergency situations Car Sharing: • Provision of emergency ride home facility for car sharers Car Park management: • Allocate priority parking space to car sharers Marketing and promotion: • Introduction of a personalised journey planning scheme • Advertising the travel plan to staff and contractors through recruitment • Item on team meeting agenda	The Applicant has submitted an updated Construction Worker Travel Plan within Appendix 6 of the FCTMP (REP1-070). With regards to specific additional measures the Applicant notes that the following measures are included: • Provision of travel information notice boards and promotional events; • Provision of car parking permits on a basis of 1 per 1.5 construction workers to encourage car sharing to and from the Converter Station construction compound; • Cycle to work voucher scheme; and • Provision of a shuttle bus service between main local transport hubs and local hotels where construction workers may be accommodated. The Applicant considers that these measures are appropriate given the temporary nature of the construction period.
A7.34	Paragraph 5.3.1.1.1 states that a car sharing app could be developed specifically for the site. This is an interesting measure, but there are existing car sharing websites which can also be promoted such as https://liftshare.com/uk. Travel Plan Coordinator (TPC) resources should also be allocated to administering car sharing for the FCWTP, potentially forming part of the personalised travel planning.	Given the temporary nature of the construction period this proposal has been removed from the Framework Construction Worker Travel Plan (appendix 6 of the FCTMP (REP1-070). The Applicant notes the availability of existing car sharing services, which will be promoted through the Construction Worker Travel Plan alongside measures to promote car sharing to and from the construction compound. Further details of this are included within section 7 of the Construction Worker Travel Plan.

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A7.35	Paragraph 5.4.1.1.2 states that a shuttle bus from the Havant Rail Station will be considered. This should be in place at the start of construction and suitably promoted amongst workers. This service should be monitored and expanded if there is sufficient demand. A shuttle service to Cosham Rail Station should also be considered.	Details of the shuttle bus are included in Section 4 of the FCTMP (REP1-070) and Construction Worker Travel Plan (Appendix 6 of the FCTMP). The shuttle bus service will be operated by the Contractor between the Converter Station Area and nearby locations to reduce the requirement for construction workers to travel to site by private vehicle. The operation of this shuttle bus service will be kept under review for the construction period but at this stage it is assumed that it would provide pick-up and drop-off to the following locations: • Havant Railway Station (which provides links from London, Chichester, Portsmouth and Southampton); • Waterlooville town centre (which acts as a terminus for a number of local bus routes); and • Local hotels used for accommodation by construction workers.
A7.36	The action plan as set out in table 6-1 should be amended to better reflect the example below. A cost estimate for these items must be included which is used to approximate an appropriate cash deposit to support the Travel Plan.	No cash deposit is to be provided to support the Travel Plan. This is not necessary. Compliance is required by virtue of the DCO and the statutory scheme.
A7.37	Further information must be supplied regarding the monitoring scheme for the FCWTP. Travel questionnaire surveys or Trip Rate Information Computer System (TRICS) database's Standard Assessment Monitoring 68 (SAM) surveys should be conducted annually to determine the modal split, and monitor progress towards the targets set out in Section 7.1. A minimum 35% response rate should be attained in order for travel questionnaire surveys to be considered statistically significant.	Section 7.2 of the CWTP (Appendix 6 of the FCTMP (REP1-070) notes that modal splits will be monitored by the Travel Plan Coordinator through the undertaking of travel surveys at 6 months, 1 year and 2 years into the construction stage. The Applicant considers this to be acceptable and that HCC's suggested methodology is not appropriate for the temporary nature of the construction phase.
A7.38	There should be measures in place to encourage construction workers to complete a questionnaire survey. Entry into a prize draw could be offered to those who complete a survey, although it should be noted that the prize should not be travel-related (e.g., bus tickets, cycle vouchers, etc). A sample questionnaire survey should be provided in the appendices	The Applicant does not intend to promote a prize draw. The measures included in the Framework Construction Worker Travel Plan are adequate without this.
A7.39	There should be a reference in the document to a means for enforcing the FCWTP. Typically, this is accomplished through a Section 106 agreement. A commitment to pay HCC's monitoring and approval fees should be included in Section 7. Sanctions should also be in place in the event that the commitments stated in the FCWTP are not met. This includes any remedial measures which could be implemented if the targets are not met, e.g. personalised transport planning.	The implementation of the Construction Worker Travel Plan is a requirement 21 of the draft Development Consent Order. Compliance is required by virtue of the DCO and the statutory scheme. Monitoring fees may be covered in the post-consent PPA to be entered into.
A7.40	The FCTMP states that Abnormal Invisible Loads will comply with the statutory regulations, including agreement of routing and communication with affected residents and other road users. This should be secured within the DCO Requirements.	All details contained within the FCTMP (REP1-071) are secured by Requirement 17 of the DCO (REP1-021).

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A7.41	There is only one signal junction on the route of the abnormal load (transformer) which is Portsmouth Road/ Catherington Lane/ Dell Piece. There are 6 signal poles that will be affected by the abnormal load. None of the poles are in the sockets which makes the task of removing them more challenging, and therefore their removal will need to be arranged significantly in advance of the load passing through. The advance work will need to be programmed approximately 3 months before the abnormal load is taken through. Existing road space bookings may restrict these movements.	The Applicant is preparing a Technical Note that will provide a proposed methodology for undertaking these works in relation to the delivery of multiple transformers associated with the Proposed Development. This document will be shared with HCC as soon as possible.
A7.42	If it is required that the existing poles are removed, then new sockets and poles will be required to be installed. The street furniture could be re-used, and the signal cables disconnected and rewired. This may require temporary lights to be installed to allow necessary work to be undertaken.	See 7.41
A7.43	On the day that the abnormal load is taken through, the Applicant will need to arrange for Hampshire County Council's contractor to be on site to remove these 6 signal poles. Further details of the Traffic Management will decide how the traffic is managed directly in advance of the load going through as certain movements will no longer be available or be under 69 signal controlled. It would also be necessary to know the ground clearance of the abnormal load/vehicle.	See 7.41
A7.45	There is also widening works required at the junctions of Lovedean Lane/ London Road and Lovedean Lane/ Day Lane to facilitate the abnormal load delivery. However no information has been submitted detailing what these are proposed to be, nor the timescales for implementation. This information is required. Any widening required at the junctions of Lovedean Lane/ London Road and Lovedean Lane/ Day Lane should be temporary and once all abnormal load movements have been completed, the carriageway/ verge restored back to its original width and standard. A S278 will be required for these works and secured appropriately within the DCO.	See 7.41 These works will be permitted by the powers included in the DCO and the approval process provided for by this will be followed.
A7.46	Details are required for an indicative timescale for the abnormal load arrival (i.e. all 6 in one day/ week/ month) as well as tracking drawings showing how the trailer can return to the strategic road network after delivery	This information will be provided by the contractor post contract award at detailed design stage.
A7.47	The Framework Traffic Management Strategy (FTMS)has been reviewed, specifically Appendix G of the Transport Assessment. Hampshire County Council has the following comments: • 2.7.1.3. The "Overlord" event in Denmead needs to be noted and planned around. It is held over a weekend in May/June each year. https://www.overlordshow.co.uk/ • 2.8.1.2. The Applicant should include and liaise with Havant and Waterlooville Football Club.	The Applicant notes these comments and provides individual responses as follows: 2.7.1.3: The Applicant considers the considers that the programme restrictions contained within the FTMS (REP1-068) provide suitable mitigation of traffic impacts associated with local events. As the Overlord event is typically held over a weekend and Bank Holiday (when traffic flows are typically lower than peak periods) further restrictions to construction work are not necessary.

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	• Passing motorists should also be recognised as a stakeholder and accordingly, advanced warning signs advising of works must also be considered for each site. • 2.8.3 Hampshire County Council will be seeking to direct enquiries relating to the project to a bespoke website created and managed by the Applicant. It is considered essential that the website focusses on the identified stakeholder groups and the impact from each specific site. • 2.8.4. The 'roadworks.org' website has been rebranded as one.network. It is noted that the Applicant proposes to add works details to the one.network website. Hampshire County Council would like further information on how this would be achieved. If Applicant were to use the nationally prescribed electronic system for permits, this website would be automatically updated. It is also recommended that the Applicant take advantage of the one.network 'comms app' as this would greatly help their ability to reach the various stakeholders. • 2.8.6 Hampshire County Council will seek to work with the Applicant to ensure that all councillors are kept updated and informed in an appropriate manner. • 2.10. Hampshire County Council's Passenger Transport Team will need to be actively engaged in any works impacting bus lanes, routes or bus stops. A charge may be made for setting up of temporary bus stops. • 2.11 Restricting works outside schools to summer holiday periods may be possible. However, the A3 is a key link to and from places of education and any works on this corridor will impact schools, so there will be an unavoidable impact on students travelling to and from places of education. • 2.12. Hampshire County Council would like further discussions on the 'Responsive Traffic Management Protocol'. This seems to reflect the existing processes of permit modifications, but it would be necessary to see how the Applicant consider this might work on a day to day basis. Again, the adoption of Hampshire County Council's permit scheme would greatly assist in both parties reacting in an agile manner to traffic complications arising from the works.	2.8.1.2 The Applicant accepts this comments and agrees to include Havant and Waterlooville Football Club as a key stakeholder included in Appendix 8 of the Onshore Cable Route Construction Impacts on Access to Properties and Car Parking and Communication Strategy. Details of proposals for advanced warning signs is included within Section 2.8.2 of the FTMS (REP1-068). 2.8.3 The Onshore Cable Route Construction Impacts on Access to Properties and Car Parking and Communication Strategy included in Appendix 1 of the FTMS (REP1-068) provides details of the project website that will be provided to include a dedicated construction section. This will be continually updated and revised to reflect current and forthcoming construction progress. Two weeks prior to commencement of construction of any element of the Onshore Cable Route letters and emails will be also issued to all identified stakeholders. 2.8.4 The Applicant considers that the provision of a dedicated project website and the proposed communication strategy as adequate for the Proposed Development and therefore it is not necessary to use Roadworks.org. This communication strategy is details in Onshore Cable Route Construction Impacts on Access to Properties and Car Parking and Communication Strategy included in Appendix 1 of the FTMS (REP1-068). 2.8.6 and 2.10 The Applicant accepts this comments and agrees to include local councillors and HCC Passenger Transport Team as key stakeholders included in Appendix 8 of the Onshore Cable Route Construction Impacts on Access to Properties and Car Parking and Communication Strategy. 2.11 The programme restrictions contained within the FTMS are considered to be robust and provide adequate mitigation of impacts on the A3 London Road. As stated within the Section 4.31, 4.33, 4.35, 4.41 and 4.43 construction work facilitated by shuttle working traffic signals is only permitted outside of the school holidays in June and July when traffic flows are lighter, therefore reducing the impact on students traveling to and from places of education. 2.12 Further details of the responsive traffic management protocol are included in Section 2.12 of the FTMS (REP1-068). The dDCO (APP-019) contains the following Protective Provisions: Paragraph 10 of the protective provisions for the protection of the highway provides the ability for the highway authority to provide directions in relation to the works: • Where an emergency occurs or where necessary to secure the safety of the public; • Where works are being carried out in any manner which constitutes or is likely to constitute a danger to any person or class or persons or to affect the stability or integrity of any structures or apparatus including the public highway; and • Where, as a consequence of unforeseen circumstances, in the reasonable opinion of the relevant highway authority any part of the works being carried out or to be carried out within the public highway are causing or are likely to cause serious disruption to traffic that will endanger the safety of the public.

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		Paragraph 4(2) of the protective provisions for the protection of the highway provides for any detailed traffic management strategy to be revised where necessary in the event of unforeseen circumstances. The Applicant has carefully considered the undertaking of works at night and at weekends, and the adverse amenity impacts associated with doing so. The Applicant will not accept any position where HCC seek to force the Proposed Development to be undertaken in a manner which gives rise to unacceptable environmental impacts.
A7.48	In general, the traffic management proposals can be summed up as lane closures and temporary traffic lights along the A3 from the administrative boundary of Hampshire with Portsmouth City Council to the converter station. Accordingly, the restrictions on traffic movements will be likely to be required . These restrictions will need to be secured through Hampshire County Councils' permit scheme, or as part of any alternative approval process described in the approved DCO and can be summarised as follows: • Temporary traffic signals are likely to be required to be manually managed to manage the dynamic changes in traffic flows and keep critical junctions clear. • Works to be expedited at certain parts of the network to minimise impact on traffic and residents. This may involve working additional hours. • Working in the month of December must be avoided at all costs in order to protect the vital Christmas trade and traffic at this time of year. All works should be lifted, and the highway should be free and open to all traffic with no restrictions. • The A3 is a tactical diversion route for the A3(M). The Applicant will need a plan, agreed by Highways England and Hampshire County Council, in place to reopen the highway in the case of a long running incident on the A3(M). • Permanent reinstatements of the highway should be secured wherever practical. Temporary reinstatements should be a last resort and where a quick reopening of the highway is necessary. It is essential that works for permanent reinstatements are planned and coordinated in a similar manner to the main works. • Section 6.7. of the FTMS-The stated closures on the A3 between Post Office Road and Rocking Horse Nursery are very likely to be required to be night closures only as a result of the high volumes of traffic during the day. Similar restrictions have been used on other works requiring closures on this road. Similar restrictions have been used on other works requiring closures on this road. Similar restrictions will apply to any proposed closures on the A3 or the B2150	The Applicant is fully committed to following necessary process, however it is the case that to ensure the delivery of the Proposed Development within good time and minimising adverse impacts a more bespoke approach cognisant of and ensuring compliance with the FTMS (REP1-068) is required. The FTMS (REP1-068) states that all shuttle working traffic signals will run in Vehicle Actuated mode during the off-peak period but will be manually controlled during peak periods. Further details of the responsive traffic management protocol are included in Section 2.12 of the FTMS (REP1-068). The dDCO (REP1-021) contains the following Protective Provisions: Paragraph 10 of the protective provisions for the protection of the highway provides the ability for the highway authority to provide directions in relation to the works: • Where an emergency occurs or where necessary to secure the safety of the public; • Where works are being carried out in any manner which constitutes or is likely to constitute a danger to any person or class or persons or to affect the stability or integrity of any structures or apparatus including the public highway; and • Where, as a consequence of unforeseen circumstances, in the reasonable opinion of the relevant highway authority any part of the works being carried out or to be carried out within the public highway are causing or are likely to cause serious disruption to traffic that will endanger the safety of the public. Paragraph 4(2) of the protective provisions for the protection of the highway provides for any detailed traffic management strategy to be revised where necessary in the event of unforeseen circumstances. The Applicant has carefully considered the undertaking of works at night and at weekends, and the adverse amenity impacts associated with doing so. The Applicant will not accept any position where HCC seek to force the Proposed Development to be undertaken in a manner which gives rise to unacceptable environmental impacts. The position with regard to when works may be carried out, including during the month of December, is provided for in the FTMS. Taking into account that works may only take place in 6 locations on the highway across the whole of route at any one time, and that sensitive locations are already programmed to be avoided at this time, no further mitigations are necessary in this regard.

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A7.50	It is noted that Article 8(3) of the draft DCO seeks to disapply Hampshire County Council's Traffic Management Permit Scheme Order 2019. Hampshire County Council's position, as Highway Authority, is that it is unacceptable to disapply this. This is because the proposed alternative in the DCO is resource intensive and not as agile as the permit scheme. Noticing and permit schemes have been operated nationally for over 20 years and are a well-established means of enabling the Highway Authority to comply with its legal duties to coordinate works and maintain traffic flow. Hampshire County Council's permit scheme has been developed in line with national guidance and is in line with other schemes operated across the country. All works promoters operating within the county make use of the permit scheme and all works are recorded on the County's Street Works Register. This allows efficient coordination of the works to the benefit of the applicant, Hampshire County Council and the wider communities.	The Applicant is fully committed to following necessary process, however it is the case that to ensure the delivery of the Proposed Development within good time and minimising adverse impacts a more bespoke approach cognisant of and ensuring compliance with the FTMS (REP1-068) is required. It is considered all necessary agility has been included for within the protective provisions for the protection of highways and traffic, which the Applicant looks forward to discussing with the authority. This is the clear and compelling reason why the permit scheme is not to be utilised. The Applicant will not change its position in this regard. The protective provisions for the protection of highways and traffic have been purposefully drafted taking into account HCC's Traffic Management Permit Scheme Order 2019 and moreover the authority's legal duties in relation to the management of its network. It is considered they are adequate to ensure all legal duties will be capable of being complied with, and that they will ensure the efficient coordination of the works to the benefit of all parties. If the authority has any specific concerns about its ability to comply with its legal duties to coordinate works and maintain traffic flow, the Applicant would be grateful to be made aware of these. The need for approval of detailed traffic management strategies ensures reasonable conditions can be included, as would be the case where the permit scheme is used. Ultimately the works must be carried out in accordance with the FTMS (REP1-068) and the process included within the DCO provides for this whilst protecting the interests of the authority. The Applicant has already confirmed its willingness to meet the authority's recourse costs for post-consent approvals via a PPA. It not considered the process provided for by the DCO is any more resource intensive than if the permit scheme were followed, and in fact taking into account how the works need to be delivered in accordance with the FTMS to minimise impacts it is considered following the permit scheme would be an ill-fit and cumbersome in relation to the Proposed Development, and ultimately would require more resource as well as potentially jeopardising the efficiency of deliverability.
A7.51	More details need to be provided in the FTMS to the processes proposed for keeping stakeholders informed. Specifically, there is great value in the use of the one.network website to disseminate information and manage enquiries. The one.network website should be used to log works and manage communication. Because of the high level of impact of the works, the Applicant should fund Hampshire County Council's use of the one.network 'route monitor' product specifically for the A3 corridor .	This request is being considered and will be discussed with HCC further as necessary in due course.
A7.52	Calendar restrictions for various phases of works need to be reviewed to consider local activities and the general December restrictions for Christmas working. Further detailed discussions with the Applicant will be needed to manage works and minimise disruption on the A3, which is a strategic route and a tactical diversion route for the A3(M)	The FTMS (REP1-068) includes a two-week shut-down of construction work on the Onshore Cable Corridor to cover the Christmas and New Year period. In addition, the FTMS prohibits work during December on: • B2150 Hambledon Road and A3 Maurepas Way between Milton Road and A3 London Road (in proximity to Wellington Retail Park, Asda supermarket and Waterlooville town centre); • All sections of A3 London Road where shuttle working traffic signals would be required to facilitate construction of the Onshore Cable Route.

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		The Applicant considers these restriction to be appropriate to mitigate impact on traffic during the Christmas period whilst allowing for an expedient construction programme
A7.53	This project is likely to have a significant impact on the travelling public and on the structure of the public highway. The plans currently proposed by the Applicant lack detail to enable the County Council to have confidence that it will be able to execute its duties under Section 59 of New Road Street Works Act and Section 16 of the Traffic Management Act. The proposals to disapply Hampshire County Council's permit scheme and replace it with a bespoke process will result in a resource intensive process to approve and coordinate works. Accordingly, additional funding to resource the coordination and roadspace booking will be sought from the Applicant	See the response to A7.50 above.
A7.56	In relation to changes in heavy vehicle movements, redistribution of traffic due to delay caused by the proposed works may result in heavy vehicles choosing to use inappropriate routes to limit delays. As such, the Highway Authority requires a commitment from the Applicant to progress temporary weight restrictions through the TTRO process to restrict use of certain roads by larger vehicles at the request for the HA should the need arise.	The routes to be used by HGVs associated with the Proposed Development are detailed in Sections 3.4 and 3.5 of the FCTMP (REP1-070). The Transport Assessment (APP-448), and Supplementary Transport Assessment (REP1-142), include the assessment of general HGV traffic. These assessments have not shown any need for TTROs as a result of general HGV traffic reassigning to other routes. The Applicant does not consider it appropriate to provide TTROs in relation to restriction of vehicle movements not associated with the Proposed Development..

6. APPLICANT'S COMMENTS ON WINCHESTER CITY COUNCIL LIR

6.1. INTRODUCTION

6.1.1.1. This document submitted for Deadline 2 of the Examination contains the Applicant's response to WCC's LIR (REP1-183).

6.1.1.2. Responses to the WCC LIR have been provided by topic area, to assist the ExA in their review.

6.1.1.3. The Applicant has provided responses to points where it is considered this will assist the ExA in considering the point raised in the LIR.

7. COMMENTS ON WINCHESTER CITY COUNCIL LOCAL IMPACT REPORT

7.1. APPLICANT'S COMMENTS ON LOCAL IMPACT REPORT

Table 7.1 - Applicant's Comments on Winchester City Council Local Impact Report - General

Para No.	Local Impact Report Statement	Applicant's Response
4.1.1	In the relevant representation submitted by Winchester City Council dated 19 February 2020 (RR-198) a series of 17 main issues were identified by the Council. This statement develops those outstanding issues together with additional considerations that have emerged since that date.	The Applicant notes this comment and refers to the Applicant's Response to Relevant Representations RR-198 submitted at Deadline 1 (REP1-160).
4.2.2	Continuous engagement should reduce the gap between the two parties and progress is being made in certain areas. The delay to the commencement of the Examination Stage offered a longer than normal period for discussions to take place. That engagement continues. To date, the applicant has not formally changed or amended the original application. Accordingly, the Council feels obliged to base this LIR on an assessment of the application that was submitted on 14 November 2019. Where engagement has/is taking place and change is anticipated, this will be acknowledged in the conclusions.	Noted and the Applicant reaffirms its commitment to an ongoing engagement with WCC throughout the Examination.
4.3.2	During the construction phase, there will be widespread impacts as the cable is installed and as the converter station is established. Where the cable route follows the road the main impacts will be on road users and on the immediate environment as hedgerows and trees are at risk of removal. As the cable route turns off the road to follow a countryside route, the main impacts will be on the natural environment. At Lovedean the changes to the natural environment will be dramatic in terms of loss of habitat, changes to ground levels and changes to landscape. The local community will bear any issues associated from disruption from construction traffic	Construction impacts are, by their nature, temporary effects, and therefore any impact on amenity will be temporary. The ES (APP-116 to 145) in its various chapters comprehensively evaluates such impacts, while the OOCEMP (REP1-087), the FTMS (REP1-068) and FCTMP (REP1-070) propose mitigation measures to address such impacts and such measures are secured by suitable requirements of the dDCO (REP1-021). The Outline Landscape and Biodiversity Strategy (REP1-034) sets out the approach to and secures the delivery of landscaping and ecological mitigations. The position with regard to habitats and the extent of loss, including an explanation of the increase in priority habitat units that the Proposed Development will achieve, is set out in the Biodiversity Position Paper (REP1-138).
4.3.4	Whilst the section of the cable route on the rest of the Hambledon Road and down the A3 both lie outside the district, any proposals that may impact on the free passage of traffic on those roads will have a direct impact on residents of the district who use those roads. Accordingly, it is requested that this impact on residents of the district is noted and taken into consideration when assessing the aspects of this proposal.	Please refer to our response above in relation to Paragraph 1.4.16 below which provides information in relation to the assessment of the impacts referred to and the mitigation that is to be secured in relation to them.
4.6.6	<u>Legacy benefits</u> The Council considers that in view of the long terms presence of the building, the applicant should be reaching out to the local community to share with them a level of the benefits that will accrue from the operation of the	The Applicant refers to the Needs and Benefits Addendum submitted at Deadline 1 (REP1-136), which outlines in section 4 the local and regional benefits of the Proposed Development. The Applicant is willing to enter into discussions regarding valid section 106 obligations, however the provision of a community fund is not necessary to make the proposal acceptable in

Para No.	Local Impact Report Statement	Applicant's Response
	Converter Station. In supporting this position, the Council notes that the proposal has the same characteristics as a generating facility. This is considered to be the main reason why the Secretary of State issued the Section 35 Direction dated 30 July 2018 which allow the project to be considered as a Nationally Significant Infrastructure Project (AS-039). The first reason in the annex to that direction refers to the project as "similar in terms of electricity capacity to a generating station". Furthermore, the proposal is canvased as a scheme that will result in low carbon electricity. If you consider the two aspects of a generation facility that produces low carbon power then the Council would suggest the closest comparison is a wind farm. The Council notes the support by government for this type of community benefit which is set out in the DECC publication Community Benefits from Onshore Wind Developments: Best Practice Guidance for England. The applicant is invited to adopt the same approach as outlined in this publication and work with the Council on the agreement and establishment of a community benefit fund. This publication is conscious of the need to avoid any suggestion that a consent may somehow be bought. Applicants are therefore invited to participate in this arrangement. The Council hope that the applicant will engage in discussions in the same spirit. The Council has already undertaken some preliminary considerations into this matter and is confident that rapid progress could be made towards a satisfactory agreement established through a planning obligation (section 106 agreement).	planning terms and may not be secured and lawfully taken into account in the determination of the Application. This has been made expressly clear to WCC on several occasions. It is noted that the non-provision of a community benefits fund is not something that is relevant to the ExA determination of the Application. The Applicant notes that WCC has creatively sought to compare the Proposed Development to an Onshore Wind Farm, with that type of development being subject to specific government guidance in relation to the provision of community benefits, which that guidance acknowledges are separate to the planning process. The Applicant also notes such guidance is not applicable to Interconnectors and does nothing to change the position at law regarding when such benefits may be taken into account in connection with the determination of an Application. WCC is wholly incorrect to suggest any agreement on such matters could be secured by way of a planning obligation. It would be unlawful to do so.

Table 7.2 – Applicant's Comments on Winchester City Council Local Impact Report – Alternatives and Rochdale Envelope

Para No.	Local Impact Report Statement	Applicant's Response
4.4.2	The applicant has adopted the Rochdale Envelope principles within the application. However, the Council is questioning whether it is appropriate for this approach to be applied throughout the entire scheme. The Council believes that there are circumstances where this approach is not appropriate and a higher level of clarity and detail is required. The applicant has already accepted the need for a more detailed approach in the consideration of the Converter Station when they established the design group and has put forward a number of guiding principles. This is in recognition of the environmental sensitivities of the impact on the landscape and the proximity to the National Park.	The Applicant disagrees. The adopted Rochdale Envelope assessment approach is appropriate for the scale and nature of the Proposed Development and the assessment carried out is robust and the dDCO (REP1-021) together with the control documents ensures the parameters of the assessment are secured. Whilst the Proposed Development has been designed to reduce the extent of the landscape impacts, and which naturally takes into account landscape impacts on the National Park, it is not correct to state that the design meetings have been as a result of the sensitivities of the impact on the landscape and the proximity to the National Park. The design meetings have been held so as to further the details of the design approach to the Converter Station, noting that it always necessary to capture design guidelines/principles when progressing an outline design to provide a sufficient level of certainty in respect of the development to come forward. The design meetings are focused on agreeing those principles, so as to provide confidence to all interested parties in respect of the built

Para No.	Local Impact Report Statement	Applicant's Response
		form that is to be consented. The Applicant fully recognises that It is important the Converter Station achieves good design so as to minimise its impacts and has progressed the design meetings with the authorities to ensure they can provide input into this process and the formulation and refinement of the design principles. For further information regarding the design of the Converter Station please see the Design and Access Statement (REP1-031) and the First Written Question Responses – Appendix 1 Converter Station Design Approach (REP1-092).
4.4.3	The Council considers that there are two specific areas where the Rochdale Envelope is being applied too liberally and that further information is essential for a reasonable assessment of the application to be undertaken. These are: i. In the consideration of the cable laying in Hambledon Road and the means of exiting the road into the land to the north. ii. In the onshore biodiversity proposals and specifically in the section between Hambledon Road and Anmore Road where part of the installation will be by HDD and part trenching up though the Kings Pond Meadow SINC and then across the Anmore Road The full details of why the Council considers that further information is required will be outlined in the relevant sections of this statement that deal with the above areas.	The Applicant confirms the Order limits and the design parameters for the Proposed Development as well as clearly identifying what the Proposed Development will comprise, that has allowed the Environmental Statement ('ES') to assess the Proposed Development on the basis of the likely worst case adverse effects. The parameter envelope used for the assessment of likely significant environmental effects is wholly adequate and has allowed for the robust assessment of the worst-case effects, and the Requirements of the dDCO (REP1-021) ensure those parameters are secured and the Proposed Development cannot be carried out in a manner that will give rise to likely significant environmental effects that have not been identified and assessed as part of the EIA undertaken and reported in the ES. With regards to the two specific areas: i. The Order limits maintain the option for the HDD-5 compound location to be located either to the north or the south of Hambledon Road. The assessment of onshore ecological impacts determines that the option of locating the compound to the north of Hambledon Road represents a worst case due to the presence of lowland meadow habitat, which includes the transition from the highways works to the compound location; ii. For the section between Hambledon Road and Anmore Road, the Order Limits have allowed the ES to assess worst case adverse effects on ecological features present, notably lowland meadow habitat and Soake Farm Meadows and King's Pond SINCs. The design commits to avoidance of Soake Farm Meadows through HDD as outlined in the HDD Position Statement (REP1-132), while trenching through of King's Pond SINC is via habitat that is less botanically rich than that present elsewhere in the meadows. The limited limits of deviation provided for by the Order limits in relation to the Onshore Cable Route are necessary to ensure the proposed Development may be delivered without impediment, and proportionate in this regard also.
4.6.4.1	At the Preliminary Meeting, submissions where made on the merits of considering a route for the cable circuits across the open countryside to the west of the A3. It was agreed that this aspect should form part of the Examination. The paper submitted by the council by Procedural Deadline B (PDB-006) addressed the merits of the matter forming part of the examination process and did not consider the concept of the alternative route in any greater detail. That is the purpose of the following section of this report which should be assessed in the context of the paper already submitted. When commenting on the cable route in the following section, the Council makes no judgement on the merits of Eastney as a landfall point.	The Applicant refers to the Supplementary Alternatives Chapter (REP1-152). This supplementary material to Chapter 2 (Consideration of Alternatives) of the ES has been produced so as to provide further clarity in respect of the reasonable alternatives studied by the Applicant and the main reasons for the option chosen, including in respect of the utilisation of the 'Countryside Route'.

Para No.	Local Impact Report Statement	Applicant's Response
4.6.4.2	From the evidence trail submitted, it is clear that Aquind have only considered in any detail the option of running the cable circuits up the public road network. If there is a need for a cable to reach Lovedean, then the Council must question why any other option beyond the A3 and B2150 Hambledon Road has not been considered for the section from Portsdown Hill to Denmead.	The considerations in relation to the Countryside Route, and how the factors taken into account in relation to the use of this route or the highway in this location and the reasons for the final selection made, are detailed in the Supplementary Alternatives Chapter (REP1-152).
4.6.4.5	The study has considered two routes which are annotated on the attached plan as route A and route D. Route A avoids any SINC or ancient woodland and runs parallel to the over head pylon line. Where it runs through the West Waterlooville Development Area (WWDA) it would utilise what is intended to be open space. Route B is a slight deviation, avoiding the WWDA and move further away from the overhead route. By contrast route D avoids the WWDA completely. However, it would need to negotiate two designated woodlands. This could be achieved by horizontal drilling. The second jump off point part way up the A3 is identified as route C on the plan. This route runs west and could join route A, or it could continue across the southern edge of the woodland and joint route D.	Havant Borough Council ('HBC') and Winchester City Council ('WCC') jointly requested the consideration of alternative options for the Onshore Cable Route (known as the 'Countryside Route'), which the Applicant had already considered. Further information regarding the identified potential impacts in relation to the Countryside Route and an indication of the main reasons for selecting the route chosen, including a comparison of the environmental effects between the two is set out in Section 8 of Supplementary Alternatives Chapter (REP1-152). Route D as illustrated in Appendix L of the WCC LIR is a new alternative being presented and as such has not been assessed by the Applicant and included in the supplementary alternatives chapter (REP1-152) or considered by the Applicant. The similarities of this route to the Countryside Route are noted, as is the effort to engineer an alternative which is less impactful than those previously put forward. Nonetheless, taking into account the main reasons which led to the selection of the highway route, being the desire to avoid construction impacts on ecological receptors (which remain in the vicinity and would likely be affected) and the sterilisation of land, and also to avoid the need to compulsorily acquire any land in this location, it is not considered the suggestions now advanced would alter the choice of the selection of the route selected for the Proposed Development.
4.6.4.6	The difficulties of the countryside route are not underestimated and clearly a balance sheet needs to be created to review the benefits and dis-benefits of one option in comparison to another. As note in the paper submitted at the Preliminary Meeting, the assessment of the positive and negative aspects of both options may not be a simple matter. The impacts associated with a country route will be screwed towards environmental factors whilst those impacts associated with the road option will fall on the local communities and road users. At the present time, the choice of the road route appears to be imposing all the dis-benefits on the local communities, road users and indeed the wider society.	The Applicant refers to the Supplementary Alternatives Chapter (REP1-152). This supplementary chapter to Chapter 2 (Consideration of Alternatives) of the ES has been produced so as to provide further clarity in respect of the reasonable alternatives studied by the Applicant and the main reasons for the option chosen, including in respect of the utilisation of the 'Countryside Route'. It is correct that the Applicant had already studied the Countryside Route at the time of discussing matters with WCC in August 2019. It is not understood what benefit WCC consider would be derived from discussing this matter with the Planning Inspectorate at the time suggested. It is of course for an Applicant to satisfy itself that has undertaken the assessment necessary to satisfy the requirements of the Environmental Impact Assessment Regulations, as well as considering other relevant matter such a compulsory purchase.
4.6.4.7	The applicant has been aware of the Councils concern over this matter for over 18 months. It was raised in the PEIR response in April 2019. A copy of the response is attached as appendix M. In a meeting with the Aquind representatives in June 2019 when the councils PEIR responses was examined in detail, Aquind stated that they had considered the countryside option at a very early stage but rejected it due to the environmental constraints. The Council responded by questioning how any meaningful assessment could have been undertaken when the constraints associated	The assessment process is sequential with decisions taken at appropriate times based on a proportionate level of assessment so as to progress the development of a proposed development. Throughout the process it may be necessary for an Applicant to reconsider matters where it becomes apparent that a view on the impacts previously taken has changed as a consequence of new information or the identification of new/unexpected impacts. The Applicant confirms that no such new/unexpected impacts arose following the Applicant's assessment of the Countryside Route, and so whilst it has naturally reconsidered matters following the PEIR response from WCC (and HBC) with regard to the Countryside Route, this review did not

Para No.	Local Impact Report Statement	Applicant's Response
	with the road option where only becoming apparent as the scheme was developing in 2019? The Council highlighted that the absence of a realistic consideration of the countryside option could potentially be a fundamental flaw in any submission. Accordingly, it advised Aquind to discuss this matter with PINS during one of their contact meetings. At a subsequent meeting between the Council and Aquind in August 2019, it was reported that the matter was not discussed with PINS and that Aquind where confident in how they had dealt with it. The Council noted this position and said they would continue to work with Aquind but reserved the right to raise it at the Examination Stage. The record of the notes from the June 2019 meeting accompanied the Councils first response regarding the Preliminary Meeting (PDA-005).	alter the Applicant's view on the likely impacts, how they compare to the selected option along the highway, and the decision taken to select the option along the A3. Taking into account the detailed assessment of the impacts of the option chosen and the mitigations proposed in relation to them, the Applicant further confirms that the main reasons for selecting the option along the A3 in comparison to the Countryside Route remain. Further information regarding the consideration of the Countryside Route is provided in the Supplementary Alternatives Chapter (REP1-152) submitted at Deadline 1. Section 8 considers both the HBC and WCC suggested routes, concluding that the benefit of avoiding the temporary impacts on traffic whilst the works in the highway were carried out were in the Applicant's view outweighed by the potential temporary impacts associated with construction of the Countryside Route and the sterilisation of the land for the duration of the lifetime of the development where the Countryside Route is followed.
4.6.4.8	Other than to respond directly to the questions raised at the PEIR Consultation stage, the applicant does not appear to have considered in any detail the merits of the countryside route in comparison to the road route. It is considered that the merits of the need to assess the countryside option have grown over the past 12 months, as concerns over the practicalities of laying two circuits in the highway have grown. The Council has specific questions over the practicalities of laying the cables in Hambledon Road which is a single carriageway and the impacts that would result. These are documented elsewhere in this report. Appendix 22.1A Framework Traffic Management Strategy (APP-449) would seem to indicate the potential to meet some form of delay between Denmead and Waterlooville as a result of the cable installation works to be a period of 46 weeks in total. If the countryside option was possible, then such a route would remove all those concerns associated with using the A3 and B2150. The latter road would only need to be crossed which would have a much shorter impact.	The Applicant has considered the merits of the Countryside Route, and further information in this regard is provided in the Supplementary Alternatives Chapter (REP1-152). In particular with regard to these comments the Applicant highlights paragraph 8.1.13.1 which confirms: *Whilst the temporary impacts of the construction of the Proposed Development along the highway on traffic were noted, and it was acknowledged that the installation of the cable circuits along the Countryside Route would provide for a quicker installation timeframe (which would have been a benefit for the Applicant by reducing he overall timescale to construct the Onshore Cable Route), balancing the various identified impacts against one another for each of the chosen route and the Countryside Route, the Applicant concluded that the benefit of avoiding the temporary impacts on traffic whilst the works in the highway were carried out were outweighed by the potential temporary impacts associated with construction of the Countryside Route and the sterilisation of the land for the duration of the lifetime of the development where the Countryside Route is followed.* The updated FTMS (REP1-068) submitted at Deadline 1 provides further clarity with regard to impact on and the mitigation proposed in relation to the road network, including in relation to Hambledon Road. Of course, not installing the cables along Hambledon Road would mean the impacts of doing so would not arise, though that is by no means the only relevant factor to take into account.
4.6.5.1	There is only one location within the district where an alternative for the cable route is under consideration. Work Plan sheet 3 of 12 (APP-010) shows two options for entering the land on the north side of the Anmore Road. The merits of these alternatives will be considered below. As a general observation, the option of the Denmead Meadow HDD continuing below the Kings Pond SINC and emerging in the farmland on the north side of the Anmore Road would be the Councils first preference as that resolves a number of issues.	A longer drill has been considered and determined not to be feasible because at that point the Chalk (aquifer) is at outcrop. It was stipulated in the ES (Chapter 19, paragraph 19.6.1.12) (APP-134) that the HDD works would remain in the Lambeth Group to avoid the Chalk aquifer and any associated karst dissolution features (which act as a fast contaminant transport pathway to PW abstractions), which is necessary to avoid unacceptable adverse impacts. The Order limits in the vicinity of Anmore Road have been amended, resulting in a single crossing option for both circuits between Kings Cottage and Lavender House. The Applicant refers to the Position Statement in relation to the refinement of the Order limits (REP1-133) in this regard.

Para No.	Local Impact Report Statement	Applicant's Response
4.6.5.2	The reason why the cable route might divide at Anmore Road is not clearly understood. Two options are shown on the plans. Either both cable circuits will run straight across Anmore Road (the western option) utilising the gap between Kings Cottage and Lavender House or one circuit would be diverted and turn eastward onto Anmore Road for a distance of some 120 metres before turning north opposite Clifton Crescent. The eastern cable would utilise a small section of the 60m gap between residential properties on this side of the road and head northward. A TPO tree lies in the centre of the western gap between Kings Cottage and Lavender House. Whilst there is a hedge on the roadside boundary to the western side of this tree, the field boundary on the eastern side is made up of a wooden palette fence. Regarding the eastern gap opposite Clifton Crescent, this is made up of a hedgerow which is well established although exhibiting some gaps.	The Order limits in the vicinity of Anmore Road have been amended, resulting in a single crossing option for both circuits between Kings Cottage and Lavender House. The Applicant refers to the Position Statement in relation to the refinement of the Order limits (REP1-133) in this regard. The Applicant intends to not impact the tree subject to a TPO in this location. Works in proximity to the tree will be closely governed by an Arboriculture Method Statement to be submitted for approval as part of the OOCEMP (REP1-087) secured by Requirement 15(2)(c)(iv) of the dDCO (REP1-021). Please see Appendix 10 Tree Survey Schedule and Constraints Plans for refined tree retention detail (REP1-101).
4.6.5.3	In Appendix 22.1A Framework Traffic Management Strategy (APP-449) when considering the amount of time Anmore Road needs to be closed to accommodate any work (5.2.1.1) it suggests the options for the cable here are: • Both circuits straight across (western option) 2 days road closure for both circuits. • One circuit straight across, the other following a section of Anmore Road (eastern option). Up to 4 weeks road closure.	The Order limits in the vicinity of Anmore Road have been amended, resulting in a single crossing option for both circuits between Kings Cottage and Lavender House. The Applicant refers to the Position Statement in relation to the refinement of the Order limits (REP1-133) in this regard. Accordingly, the expected duration of the required road closure for both cable circuits is two days.
4.6.5.4	The position of the Council is that the retention of the TPO tree is a fundamental requirement in the choice of any option. The gap occupied by the pallet fencing does appear to offer an opportunity for both circuits to enter the land on the north side of Anmore Road without impacting on any natural feature. The gap looks adequate providing care is taken in the choice of the work area, the size and type of machinery used and with the protection of the root protection area of the tree. One complicating factors appears to be the statement on Application document reference 2.5 Access and Rights of Way Plans Sheet 2 of 10 (APP-011) which proposes an access is formed into the western gap off Anmore Road ref AC/2/a. There is a concern that there is insufficient space for an access and the 2 circuits to enter the land whilst protecting the integrity of the TPO tree. The situation is then confused by the statement in Appendix 22.2 Framework Construction Traffic Management Plan (APP-450) section 3.4.3.1 which implies that construction traffic for the Anmore section of the cable installation will travel down the internal haul road from Lovedean. If this statement is correct, the need for an access off Anmore Road into this land is unclear.	The Applicant fully intends to not impact the tree subject to a TPO in this location. Works in proximity to the tree will be closely governed by an Arboriculture Method Statement to be submitted for approval as part of the OOCEMP (REP1-087) secured by Requirement 15(2)(c)(iv) of the dDCO (REP1-021). Please see Appendix 10 Tree Survey Schedule and Constraints Plans for refined tree retention detail (REP1-101). Paragraph 3.4.3.1 of the Framework Construction Traffic Management Plan (REP1-070) refers to the access to the land north of Anmore Road, rather than to an access at the north of Anmore Road. AC/2/a shows the construction access location for Kings Pond Meadows on the south of Anmore Road. No construction access is to be constructed on the northern side of Anmore Road.
4.6.5.5	The eastern option on Anmore Road is not supported from both the perspective of unnecessary disturbance to residents by a prolonged road closure and because it would result in the removal of an as yet undefined	The Order limits in the vicinity of Anmore Road have been amended, resulting in a single crossing option between Kings Cottage and Lavender House and removing the eastern option on Anmore

Para No.	Local Impact Report Statement	Applicant's Response
	section of the hedge to allow the single cable circuit through and again to form an access (AC/2/c) This route may also have an implication on the approach route the cable takes at the top of Kings Pond Meadow which could increase the potential impact on the SINC and the roadside hedge.	Road. The Applicant refers to the Position Statement in relation to the refinement of the Order limits (REP1-133).
4.6.8	<u>The choice of Lovedean over other possible connection points to the grid.</u> The Council does not see within the submission the audit trial that justifies the assessment process which identified Lovedean as the grid connection point and the role the proximity of the site to the National Park played in that decision. Chapter 2 of the Environmental Statement (APP-117) sets out the optioneering process followed by the applicant which has resulted in Lovedean being identified as the connection point to the grid. This exercise is outlined in section 2.4. Section 2.4.2.13 says that the final choice of Lovedean as the connection point "was determined by National Grid".	Further information regarding the selection of the grid connection point for the Proposed Development is provided in the Supplementary Alternatives Chapter submitted as part of the Environmental Statement Addendum (REP1-152). The response to ExA WQ MG1.1.1 (REP1-091) is also relevant with regard to the necessity of the Converter Station being located in proximity to the Lovedean Substation. The Applicant confirms that the consideration of reasonable alternatives was undertaken by the Applicant. Whilst National Grid, in its capacity of needing to ensure an efficient and co-ordinated electricity network, assessed the options for the connection point and determined a connection at Lovedean substation to the preferable, this is information taken into account by the Applicant and has not in any way removed the need for the Applicant to proportionately consider all relevant factors.
	EN-1 in paragraph 5.9.12 which considers development outside a NP, makes it clear the importance of protecting a National Park. It is the view of the Council that the applicant should present in more detail the evidence base that resulted in the choice of Lovedean.	Further information regarding the selection of the grid connection point for the Proposed Development is provided in the Supplementary Alternatives Chapter submitted as part of the Environmental Statement Addendum (REP1-152). Paragraph 5.9.12 of NPS EN-1 provides as follows: *The duty to have regard to the purposes of nationally designated areas also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them. The aim should be to avoid compromising the purposes of designation and such projects should be designed sensitively given the various siting, operational, and other relevant constraints.* The Applicant confirms it has had regard to the National Park when considering design and landscape matters, and that it has sought to design the Converter Station Area sensitively, taking into account the relevant siting and operational constraints, and other factors such as the underlying principal chalk aquifer. The Proposed Development does not compromise the purposes of the designation of the National Park.
	The Council has sought this information since making reference to it in the PEIR response letter of 29 April 2019. To date, Aquind have not provided any response and the question remains unanswered. It has been suggested that the information may be in confidential correspondence. However, selective redaction may release the sufficient detail to answer the question	Further information regarding the selection of the grid connection point for the Proposed Development is provided in the Supplementary Alternatives Chapter submitted as part of the Environmental Statement Addendum (REP1-152). The Applicant confirms that the assessment undertaken by National Grid are confidential. Selective redaction will not surmount contractual confidentiality requirements, which are required as a consequence of the nature of the information which is of a commercially sensitive nature, as well confidential for purpose of security.
	<u>Conclusion</u>	Please refer to responses above which direct to further information regarding the considerations of the Applicant in relation to the grid connection point for the Proposed Development.

Para No.	Local Impact Report Statement	Applicant's Response
	As submitted, the application does not contain information on the weight given to the sites proximity to the National Park when the decision was made to choose Lovedean as the connection point to the grid. This detail is necessary to ensure that the proposal complies with the requirement set out in EN-1. Furthermore, without this detail there remains unanswered questions over the weight that should be given to the protective local plan polices in the context of national considerations	The Proposed Development complies with the policies relevant to alternatives contained in NPS EN-1.
	<u>Application Details</u> Chapter 2 of the Environmental Statement (APP-117) sets out the optioneering process followed by the applicant which has resulted in Lovedean being identified as the connection point to the grid. This exercise is outlined in section 2.4. Section 2.4.2.13 says that the final choice of Lovedean as the connection point "was determined by National Grid".	The Applicant submitted a Supplementary Alternatives Chapter (REP1-152) at Deadline 1, so as to provide further clarity in respect of the description of the reasonable alternatives and the main reasons for the option chosen. Section 5 of the Supplementary Alternatives Chapter sets out further information with respect to NGET's feasibility study and the three substations selected to be taken forward for systems analysis, to identify whether they provided feasible connection points to the National Electricity Transmission System (i.e. Bramley, Chickerell and Lovedean). Section 5 provides further assessment on the suitability of these substations, outlining the reasons why the Applicant's preference for the grid connection point was Lovedean substation, taking into account information also provided by National Grid from the undertaking of their assessment to identify the suitable Grid Connection point having regard to their statutory duties to provide and maintain an efficient and c-ordinated electricity transmission network.
	<u>Commentary</u> The applicant has stated that the choice of Lovedean as the connection point was given to them by the National Grid. (Section 2.4.2.13). This followed a site selection process that saw Lovedean reviewed against two other locations Chrickerill and Bramley. There is limited information on the assessment that was undertaken on the relative merits for or against each of these sites in section 2.4. What is not clear from the assessment details that are available is the degree to which the presence of the National Park featured in that assessment.	Please see the above response in this regard. Information contained in the Supplementary Alternatives Chapter (REP1-152) submitted at Deadline 1 confrims how the National Park was taken into account in the Applicant's assessment of the reasonable alternatives.

Table 7.3 – Applicant's Comments on Winchester City Council Local Impact Report – Converter Station Building Design

Para No.	Local Impact Report Statement	Applicant's Response
4.3.3	Excluding those sections of vegetation removed as part of the cable installation, the main impacts associated with the operational phase will arise from the permanent presence of the Converter Station. The local community will bear the impacts associated with the presence of the development. During the operational stage the surrounding natural environment will continue to show the changes together with the presence of the new buildings for the life of the operational phase. New planting will mature during the operational stage, but it seems inevitable that for a building of this size there will always be certain locations when parts of it will be visible.	As described in the ES Chapter 15 (APP-130), significant adverse effects are predicted on landscape character, associated local landscape features, the setting of SDNP and visual receptors during construction. As planting matures, the significance of many effects would reduce and would not be significant after 10 years. Effects would remain significant on landscape character of the area and some immediate residents within a 1.2 km radius of the Converter Station Area, and on some recreational and transport users over very localised sections of PRoW and roads within a 3 km radius of the Converter Station Area after 20 years. As stated within the Outline Landscape and Biodiversity Strategy (REP1-034), the management of existing and proposed landscapes/habitats at the Converter Station Area shall be subject to a

Para No.	Local Impact Report Statement	Applicant's Response
		detailed landscaping scheme. New planting shall be subject to a five-year period within which reinstatement is required to secure successful establishment, commencing on completion of landscaping works. The plan shall consider the management of the identified features in further detail, considering the objectives and functions, and align with the Onshore Outline CEMP (REP1-087). It is to be noted that NPS EN-1 at paragraph 5.9.12 in relation to the landscape impacts and decision making identifies that "*virtually all nationally significant energy infrastructure projects will have effects on the landscape*". This paragraph further identifies that "*Projects need to be designed carefully, taking account of the potential impact on the landscape*". The Proposed Development, including the landscape mitigations proposed, have been carefully designed having regard to siting, operational and other relevant constraints to mimnimise the impacts on landscape in so far as reasonably possible and appropriate.
	The degree to which the presence of the Converter Station can be mitigated within the wider landscape is a function of several factors. One of these factors is the degree to which it can be sunk into the ground. Reducing the overall height of any building where practical, is therefore considered to be an important issue that justifies being explored.	The Applicant refers to Appendix 3 Proposed Site Level and Earthworks Design Approach (MG1.1.6) (REP1-094) submitted for Deadline 1. This is to ensure that the cut and fill is undertaken so far as is possible without giving rise to adverse effects on the underlying principal chalk aquifer.
	In the view of the Council, the size and scale of the proposed Converter Station means that it is simply not possible to fully screen it within the wider environment. Accepting that principle means considering what measures from design through to colour and appearance can be applied to ensure it blends into the surrounding landscape as much as possible.	The Applicant refers to the updated Design and Access Statement (REP1-031) and associated design principles and paragraph 4.3.12 in the SoCG with WCC (REP1-118) submitted for Deadline 1, which states that the Applicant will continue to work with WCC, along with other interested authorities, to seek agreement of the Converter Station Design Principles.
	The importance of the issue of the design and appearance of the building emerged at an early stage in discussions with the applicant. This factor is not simply because of the sensitivity of the proposed location in the open countryside but also its potential impact on the National Park which lies to the west, north and east. The importance of this issue encouraged the applicant to establish a joint design working party of the three interested LPAs (WCC, East Hampshire & SDNP) together with the applicant. The applicant did at a very early stage at these meetings establish tight technical constraints in terms of the need for a building of a certain size with specific operational requirements and which was also resistant to fire. Whilst these where obviously important factors to consider, it is felt that the technical issues have played a dominant role in the outcome of the design.	Please refer to Sections - 5.5 of the updated Design and Access Statement (REP1-031) submitted by the Applicant at Deadline 1. This provides the technical details which have influenced the design of the converter building. The Applicant also refers to the First Written Question Responses – Appendix 1 Converter Station Design Approach (REP1-092), which provides further information in relation to the design considerations for the Converter Station. It is correct to state that the Converter Station buildings are buildings which are constrained by their operational requirements, and therefore those factors will inevitably play a key role in the outcome of the design for the building, establishing the required minimum size for the buildings.
	The degree to which the presence of the Converter Station can be mitigated within the general environment is a function of several factors. One of these factors is the finished floor level within the building. The lower this level can be set, the more the building would sit within the landscape. With the land falling from north to south the application indicates an intention to form a level platform on which to build by using the cut and fill technique.	The Applicant has sought to site the Converter Station in the most appropriate location to allow for the landscape impacts to be minimised. This has included selecting a sloped location, which allows a cut and fill into the slope to provide a level platform for the siting of the Converter Station. A level platform is of course necessary. The cut and fill exercise will see the Converter Station be as low as is feasible without giving rise to adverse impacts on the underlying principal chalk aquifer (which is a large chalk aquifer located under much of the surrounding area), and it also

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	One advantage of sinking the building as far into the ground as possible is that it would reduce the change in level that the access road will have to negotiate as it swings northward under the overhead pylon lines and then has to climb as it approaches the compound entrance.	reduces the impacts with needing to remove soils and not re-using those in connection with the Proposed Development. The Access Road has been carefully sited and designed. It is of course, much like the Converter Station, driven by the operational requirements which it is required to serve, though the finish and landscape mitigations in relation to the access road have been thoroughly explored and the Applicant is confident an appropriately designed and mitigated solution is provided for.
4.6.14	There are insufficient safeguards to ensure the retention of existing, vegetation, its enhancement or the addition of new features that are identified as screening the site. These actions also have the consequence of enhancing biodiversity value. Without securing the long term retention and management of these features, the presence of the Converter Station will have a more significant impact on the surrounding area than the applicant suggests. A corresponding reduction in habitat value will also result.	The Applicant refers to paragraph 4.3.11 in the SoCG with WCC (REP1-118) which states that a deed of covenant is being sought with the appropriate landowners for the long-term maintenance and management of existing planting and retained hedgerows, and powers of compulsory purchase acquisition are sought to acquire the rights and impose restrictions to do so for in the event a voluntary agreement is not reached with those persons. The approach being taken is very clearly set out in the Statement of Reasons (REP1-025) and the Book of Reference (REP1-027) which WCC may wish to consider. The Applicant confirms that they will be responsible for the long term management during the operational life of the Converter Station and this is reflected in the updated dDCO (REP1-021) submitted for Deadline 1.
	<u>Application Details</u> The degree of control that the applicant intends to apply for future maintenance and management of landscape features will vary reflecting the different levels of property interest that exist. Application document reference 2.2 Land Plan Sheet 1 of 10 (APP-008) shows the intended level of control that is being sought over the land at Lovedean. Whilst it is all contained within the red lined application site, the key to this plan identifies that the land will be subject to different levels of control. Some of the land will be permanently acquired whilst other land will be put to a temporary use and then released. The landscape features identified in green on the plan and which go under the title of "New Landscape Rights" will be managed through a deed of covenant. The extent of the period of time that the covenant will cover is uncertain. The submission refers to management/replacement planting being confined to a period of 5 years.	The degree of control that the applicant has will depend on the relevant property interests, though this will not alter the extent to which the Applicant is able to perform the function of retaining and managing the landscape features. The Applicant confirms that they will be responsible for the long term management of all vegetation within the Order limits at the Converter Station Area during the operational life of the Converter Station. The Applicant is required to take a proportionate approach to the securing of land and rights over land. Where the Applicant is to provide new planting in areas of closer proximity to the Converter Station where exclusive possession is necessary and the land will be demarcated as such, the Applicant is seeking to acquire the freehold interest in this land to do so. Where the Applicant is seeking to retain and manage existing landscape features which provide a screening function, rights and restrictions to do so are sought. The rights and restrictions, which are to be acquired by a voluntary deed of covenant or in the event that is not possible via compulsory acquisition, will be legally enforceable property covenants. The Applicant confirms that the rights to be acquired will not be time limited. They are the acquisition of permanent rights in all instances. Accordingly, there is no issue regarding any period that they may exist for as suggested. The Applicant also refers to the Applicant's Response to Ex A WQ 1 LV1.9.37 (REP1-091) and the Outline Landscape and Biodiversity Strategy (REP1-034) and revised dDCO (REP1-021 and 022) submitted for Deadline 1 with regard to landscape management requirements. The Applicant is confident that the approach to be taken is wholly appropriate to ensure the landscape features in connection with the proposed Development are retained and managed for the operational lifetime of the Proposed Development.

Table 7.4 – Applicant's Comments on Winchester City Council Local Impact Report – Telecommunications Building and Fibre Optic Cables (FOC)

Para No.	Local Impact Report Statement	Applicant's Response
4.6.3.2	It had originally been understood that the fibre optic cables (FOC) and the telecommunication building were needed to communicate between the two converter stations and to monitor the performance of the cable. This was stated in the Consultation Document section 2.3.1 dated February 2019. However the formal application has revealed that the FOC will now contain a commercial element. This commercial use also applies to the Telecommunication building. This is made clear in the interpretations at the start of the dDCO which say that the telecommunications building will be a commercial use of the fibre optic cable (APP-019). This has raised a number of questioned which need clarification before a view can then be expressed, whether or not, these elements of the proposal do genuinely fall within the accepted definition of associated development.	The Applicant highlights that the Consultation Document dated February 2019 made clear in three places that in addition to the integral use as part of the Interconnector, the spare fibres comprised in the fibre optic cables would also be used for commercial telecommunications purposes. The fibre optic cables are an integral part of the Proposed Development, and the Project, providing the communication link between the converter stations in the UK and France as well as the monitoring and protection facility for the HVDC cables between the two stations. Please refer to updated Design and Access Statement (REP1-031) and FOC Position Statement (REP1-127) for further information in this regard. As set out in the latter, the Applicant is content the commercial use of the spare fibres in the fibre optic cables and the extent of infrastructure required to support that commercial use lawfully constitute associated development.
4.6.3.3	In the view of the Council, the missing information relates to the following: 1. Whether the FOC is larger to accommodate the commercial use. 2. What percentage of the capacity of the cable is to be dedicated to commercial use as opposed to any use directly supporting the interconnector link. 3. Does the trench size need to be larger to accommodate the commercial FOC. 4. Confirmation that the telecommunications building is indeed related solely to the commercial use of the FOC. 5. What contribution if any does the commercial uses of the FOC play in the financing of the overall project? 6. Could this commercial telecommunications element (FOC and associated building) that sit within the overall project, be implemented on its own without the principle elements of the scheme being built?	The Applicant refers to the FOC Position Statement which responds to the comments made in relation the FOC Infrastructure (REP1-127). 1. The physical size of the cable does not increase due to the spare fibre which will be utilised for commercial purposes. As stated in the FOC Position Statement (REP1-127), in order to withstand the various physical impacts which the fibre optic cables are likely to be subject to associated with transportation, installation and operation in the marine and underground environment and to protect the glass fibres located within it, the fibre optic cables are required to be of an adequate outer diameter. Within the required outer diameter for the fibre optic cables, 192 glass fibres may be installed. The number of glass fibres required in connection with the primary use of the interconnector and as redundancy for this purpose is less than 192, though this is a multiple of fibres that is commonly produced by manufacturers. 2. The Applicant will offer any spare capacity to third party providers for commercial use. 3. The trench size is dictated by the size of the HVDC cables, the FOC will be installed alongside one of the HVDC cable and is considerably smaller. The trench width does not need to be increased to accommodate the FOC. 4. As confirmed in the FOC Position Statement, the telecommunications buildings are required solely in connection with the commercial use. 5. The Applicant refers to Annex 1 of the FOC Position Statement and the comments in relation to paragraph 5 (iii) of the Guidance. From an economic perspective, the Applicant confirms that the Project could proceed and would be viable without the commercial use of the FOC Infrastructure, however the Interconnector has been designed to operate effectively to its design capacity and to realise fully the benefits which it can provide in the public interest. The revenues associated with the commercial use of the FOC

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		Infrastructure are not necessary as a source of additional revenue in order to cross-subsidise the cost of the Proposed Development and its primary function. 6. The Applicant is seeking a Development Consent Order for an Interconnector, not a fibre optic communications network. Nonetheless, the Applicant wishes to operate the Proposed Development effectively to its design capacity. The need for and benefits of the commercial use of the FOC is detailed in the Needs and Benefits Addendum (REP1-136). The commercial use of the FOC that must be laid in any event as part of the Proposed Development negates the need for separate FOC to be provided in the future to provide the same capacity and the impacts associated with doing so.
4.6.3.4	In addition to the above questions, the Council feels that the applicant also needs to address and respond to the following related question: • The proposal would make provision of a commercial FOC link between Lovedean and France via Portsmouth. There is no indication of how the end of the FOC at Lovedean (or at some intervening point) would then be connected to the wider UK telecommunication system. This may require additional equipment that requires planning consent in its own right. Any such application would have to be considered by the relevant local planning authority against its planning policy framework. The fact there would already have been a significant commitment and installation of infrastructure would inevitably be a consideration that would force its way into the determination of any planning application. It is difficult to believe that the onward link has not already been considered. Accordingly, the Council wishes to know how the FOC would be connected to the wider telecommunications network. It is considered legitimate to seek this detail, which it is believed, would also help clarify the associated development issue.	The Applicant refers to the FOC Position Statement (REP1-127) submitted at Deadline 1. The Telecommunications Buildings will house necessary telecommunications equipment to connect to the wider network. The Applicant has not made any commitments to connect to a wider communications network at this time, it is seeking to ensure that the Interconnector has been designed to operate effectively to its design capacity and to fully realise the benefits which it can provide in the public interest. The Applicant refers to Annex 1 of the FOC Position Statement and the comments in relation to paragraph 5 (iv). As explained in Annex 1, the Applicant has obtained code powers for telecommunications infrastructure to branch off from the fibre optic cable proposed as part of the Proposed Development, supporting the position that the commercial use capacity is likely to be required in connection with other telecommunications infrastructure projects in the future. It is noted that where any other consents are required such consents will be considered on their merits in accordance with the applicable statutory regime.
	For a number of technical and impact reasons, the potential for a design of a landmark signature building is not considered suitable for this location. The Councils focus has turned to the desire for a finish that blends in with the surrounding landscape and a dark/drab colour solution is being explored within the design group. This exercise should be pursued to seek a consensus rather than leaving the matter up to a requirement. Once resolved, the amended principles should then be referenced in Requirement 6.	As referred to in the SoCG paragraph 4.3.12 submitted for Deadline 1 (document reference 7.5.4), design group meetings between the Applicant, the SDNPA, WCC and EHDC resumed in August 2020 to progress discussions on the proposed colour scheme. The Applicant notes WCC wish for darker colour than any shown on the colour palette. The Applicant will continue to work with WCC, along with the other interested authorities, to seek agreement. The Applicant considers that Requirement 6 of the updated dDCO (APP-019 Rev002) already refer to the design principles for the Converter Station and this is sufficient.

Table 7.5 – Applicant's Comments on Winchester City Council Local Impact Report – Order Limits

Para No.	Local Impact Report Statement	Applicant's Response
1.4.9	The submitted plan shows several options for entering the land on the north side of the Anmore Road. The red line which defines the limits of the DCO offers two options. Either both cable circuits will run straight across the Anmore Road utilising the 50m	The Order limits have been revised in this area removing the turn eastward onto Anmore Road for a distance of 120 metres before turning north opposite Clifton Crescent. (Land

Para No.	Local Impact Report Statement	Applicant's Response
	gap between Kings Cottage and Lavender House, or one of the circuits would turn eastward onto Anmore Road for a distance of some 120 metres before turning north opposite Clifton Crescent, utilising a 20m wide section of the 60m gap between residential property boundaries on this side of the road. A TPO tree lies in the centre of the western gap between Kings Cottage and Lavender House. Whilst there is a hedge on the western side of this tree, the field boundary on the eastern side is made up of a wooden palette fence.	Plans - Rev 02, REP1-011a).The Proposed Development will cross Anmore Road utilising the 50m gap between Kings Cottage and Lavender House. The Applicant intends to not impact the tree subject to a TPO in this location. Works in proximity to the tree will be closely governed by an Arboriculture Method Statement to be submitted for approval as part of the OOCEMP (REP1-087) secured by Requirement 15(2)(c)(iv) of the dDCO (REP1-021). Please see Appendix 10 Tree Survey Schedule and Constraints Plans for refined tree retention detail (REP1-101).
1.4.11	The DCO area at Lovedean is confined within the four lanes that form a box around the site. The actual DCO shows an irregular outlined application area. It consists of a large central core area that includes the exiting substation and a large area of open farmland to the west. A broad strip of land wraps around the southern side of the substation back to Broadway Lane. This section on the south side of the substation is dissected by the district boundary. Land Plan sheet 1of 10 (APP-008) shows this boundary In the south west corner, the DCO limit reached out to the boundaries of Old Mill Lane and the unnamed lane. There are a multiple number of "outliers" as the Order reaches out to include woodland areas and hedgerows on the boundaries of Old Mill Lane, Broadway lane and the unnamed lane to the south. To the north, the DCO limits do not reach the edge of the road. A wooded area consisting of Crabdens Copse runs along the southern edge of the substation to its SW corner and then merges into Stoneacre Copse which strikes off to the SW as a peninsular feat4ure. Neither of these two features are part of the DCO limits. The central core area is presently open agricultural land crossed by overhead pylons radiating out from the Lovedean substation which is a major land use. The substation consists of open plant with limited buildings.	The Applicant would like to highlight that the following comment is incorrect with regard to hedgerows "to the north, the DCO limits do not reach the edge of the road". The Order limits do reach the edge of the road, encompassing the hedgerows.
	The Councils concerns regarding potential impact on features resulting from the cable installation are concentrated on the Hambledon Road. There are some impacts on Anmore Road that also need consideration. The main concern on Hambledon Road result from the fact that the Order limits have been drawn to encompass a very extensive area relating to the Hambledon Road and the land to the north.	The Order limits have been created on Hambledon Road and the area to the north, to provide flexibility for the installation of cables due the level of sevice conjestion present. This flexibility will also lessen the impact of traffic congestion along Hambledon road in this area.
	In addition to the Hambledon Road sections, the Council notes a further section of highway where cables may be laid. This is along Anmore Road which is identified as one of two options for the cable route in that area. The inclusion of this route raises the question whether the cables can achieve the "turns" onto and off the road. This road could be closed (except for access) for 4 weeks. That scenario would be avoided if the cable route went straight on exiting Kings Pond Meadow.	The Order limits in the vicinity of Anmore Road have been amended, removing the option to lay the cables along Anmore Road and resulting in a single crossing option for both circuits between Kings Cottage and Lavender House.

Table 7.6 – Applicant's Comments on Winchester City Council Local Impact Report – Landscape and Visual Impacts

Para No.	Local Impact Report Statement	Applicant's Response
1.4.17	North of Anmore Road the character of the site changes as it enters an area with a more expansive landscape consisting of larger arable fields. These are still bounded by strong hedgerows with trees but the east-west hedgerows offer weaker links. Some hedgerows have been removed. In the vicinity of the main site for the converter station the landscape still retains the above character but includes a number of wooded areas that form part of the pattern of hedgerow links but which can also appear as more isolated features. The existing substation with its associated network of overhead lines is a major feature in the area but is not so dominant to override the distinct open countryside character. This is particularly true on the western side along Old Mill Lane.	The presence of overhead lines and pylons in this location is a prevalent feature.
	If micro siting option B(ii) is adopted all the above negative aspects would be removed with only the east west hedgerow HR07 being removed. Confirmation is required to ensure that any new landscaping proposals are not watered down if the hedge is retained.	The Applicant confirms that in the event that Option B(ii) is adopted, the extent of landscaping proposed to the western side of the Converter Station will not be watered down. This is demonstrated by the updated indicative landscape mitigation plans for both Option B(i) and B(ii) where additional areas of woodland have been introduced or extended - Figure 15.48 and 15.49 (APP-281 Rev002 and APP-282 Rev002 respectively) Option B(i) and indicative landscape mitigation plans for Option B(ii) (REP1-137) submitted for Deadline 1.
4.6.9	The Council favours option (B(ii) as having the least impacts on natural features and habitat. Given the magnitude of the impacts associated with the implementation of option B(i) the Council would have severe concerns based on the landscape and biodiversity impacts as set out above. It is hoped the negotiations with the Grid can be successfully concluded.	The siting of the Converter Station is subject to ongoing discussion with a number of landowners. The optionality between Converter Station location options B(i) and B(ii) is dependent on securing the agreement of National Grid to use Plot 1-27 for the siting of part of the Converter Station to facilitate Option B(ii) without detriment to National Grid's operations at the Lovedean substation. The Applicant is confident Heads of Terms will be agreed with National Grid in the near future and an Option Agreement for the necessary rights will be agreed between the parties before the end of the Examination.
4.6.12	Attached as appendix N and appendix O are the comments of both the Landscape officer and the Urban Design officer who have been involved in the discussions. On balance, the position of the Council is that the emphasis should be on ensuring that the building blends into the surrounding landscape with the choice of a material finish that is dark in colour. The concept of having a slatted finish with curved corners that provides some shadow and tone is considered to have merit. The elevations are considered to be viewed with different backgrounds and so the potential for a slight variation to the colour between the elevations is considered worth exploring. These issues are still under active consideration by the Design Group. Subject to the above matters being resolved and incorporated in the submission, the Council does accept the Building Design Principles as set out in section 6.2.2 of the Design and Access Statement (APP-114).	The Applicant refers to the updated Design and Access Statement (APP-114 Rev002) and paragraph 4.3.12 of the SoCG with WCC (document reference 7.5.4) submitted at Deadline 1 which states that the Applicant is working with WCC, along with other interested authorities, to seek agreement of the Converter Station Design Principles. Design group meetings between the Applicant, the SDNPA, WCC and EHDC resumed in August 2020 and it was agreed that the aim of the design would be create visually recessive, simple buildings; blending into the landscape as much as possible. Further work is being undertaken to review the colour palette. The Applicant makes the following responses in relation to the Urban Design Officer's comments as referred to in Appendix O and outlined below: ***Policy considerations:*** Specific policy references in Appendix 0: *High Quality Places SPD 2015*

Para No.	Local Impact Report Statement	Applicant's Response
		• *Part 4 – Layout arrangement of buildings and creation of spaces* • *Part 5 – High quality spaces* • *Part 6 – High quality buildings* • *Part 7 – Materials and detailing* *Winchester District Local Plan Part 1, Joint Core Strategy 2013* • *CP13 – High Quality Design* *Winchester District Local Plan Part 2, 2015* • *DM15 – Local distinctiveness* • *DM16 – Site Design Criteria* • *DM17 – Site Development Principles* *National Planning Policy Framework* • *Section 12 – Achieving well-design places* *National Design Guidance* The Applicant notes that these policies have been reviewed and considered in relation to the Proposed Development as set out in the Planning Statement (APP-108). ***Site context and selection:*** WCC raised a preference for Option B(ii) which offers the best balance between an engineering solution and the environmental impacts. The Applicant notes this comment from WCC. Option B(i) represented the worst case scenario in terms of landscape and visual effects and on landscape and visual grounds agrees that Option B(ii) is the more favourable option. ***Layout, scale and massing:*** *"The design development was driven in a way that fixed, at a very early stage, a number of parameters that did not uphold what is considered to be a good design approach i.e. exploring and demonstrating different options of how the design is informed by the surrounding context and address all the constrains and opportunities of the site, in order to help minimising the visual impact of the proposed building from close and distant views. During the engagement meetings, a few alternatives were suggested, in order to avoid proposing a bulky building, such as partially burying the building into the ground, breaking up the building mass, achieving a better articulation with the context.* *The applicant argued how much the building design was constrained by its operational requirements. Therefore, it was explained that the design inspiration for the proposed building is the South Down National Park with its distinctive colour palette and undulations.* *The Applicant rather believes that, through an "aesthetic treatment' of the façade, the building could seemingly blend into its surroundings.*

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		Should it become demonstrated that the proposed layout and built form is the only way forward, then the design approach to the elevations treatment should be a reflection of the landscape analysis from distant and close views, instead of reducing the exercise to a rather simplistic 'dressing up' of the elevations, with different colours or materials." *It should be included as a Building Design Principles (Document 5.5, chapter 6, paragraph 6.2.2.) that recognition should be given to the orientation of each particular view, when proposing the colour palette of the external material, for each elevation of the proposed building.* *As it is presented on the DAS, it seems relatively random the choice of the colour palette within a wide spectrum of autumn colour options, which goes from light yellow to dark grey, including several tones of blue. It would be of good approach to choose the colour based on the landscape and topography analysis of the site bearing in mind which horizon each respective elevation is facing.* *Furthermore, the concern raised by the Landscape Officer regarding the RAL colours suggested is shared in this comment; only dark recessive colours would be acceptable."* In respect of the comments above, the Applicant refers to the updated Design and Access Statement (APP-114) and paragraph 4.3.12 of the Statement of Common Ground between AQUIND Limited and Winchester City Council submitted for Deadline 1 (REP1-118) which confirms that design group meetings between the Applicant, the SDNPA, WCC and EHDC resumed in August 2020 to progress discussions on the proposed colour scheme. The Applicant note's WCC wish for darker colour than any shown on the colour palette. The Applicant will continue to work with WCC, along with the other interested authorities, to seek agreement of the Converter Station Design Principles. ***Appearance:*** WCC state that "*The concept idea of having vertical fins to the external treatment is acceptable in principle as it would allow for continuous curved corner details on the building and hopefully this would create an interesting texture, composed by the sequence of the proposed fins and shadow gap. Light reflections throughout the day (and the year) will play an important role to blend the building with the surroundings.* *However, to ensure that the external appearance of the building is of high quality standards, a sample of the proposed pre-coated metal cladding system should be submitted. It is mentioned on paragraph 5.3.3.1 that this material incorporates insulation panels and meets the functional requirements of durability, thermal, acoustic and fire separation; however, the lack of evidence at this stage does not allow to confirm the abovementioned and it is even difficult to acknowledge how effective in this regard, this proposed illustrative material would be. It is quite common to have large farm buildings cladded in corrugated sheeting, therefore some kind of analogy would be expected to be established, ideally whilst raising the quality standards of the material."* The Applicant has responded to this point as part of the design meetings with the relevant local authorities and explained that the approval of specific design details including materials will come after the DCO has been granted, at the discharge of requirements stage. Providing actual

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		samples at this point in time is not considered to be necessary and will be difficult to arrange, as no Contractor has been appointed yet. The functional requirements of the building cladding are driven by relevant health and safety and technical requirements. It is not clear whether WCC is questioning whether the materials to be used will be effective for this purpose, but the Applicant confirms they will be. Of course, a high voltage direct current interconnector is somewhat of a different proposition to a farm building, with the requirements for the materials in relation to each varying greatly. ***Building Design Principles:*** *0. Recognition should be given to the orientation of each particular view, when proposing the colour palette of the external material, for each elevation of the proposed building.* *1. External cladding and roofing to the buildings will be pre-coated metal, or equivalent durable low-maintenance material subject to approval by WCC council.* *2. The wall cladding be comprised of narrow vertical elements of varied colours to break up the mass of the building.* *3. Colours will be selected from a dark recessive palette of colours within the ranges below chosen to complement the surrounding landscape.* • *RAL 7043, 7010, 7009, 7039, 7003 (as per Landscape Officer suggestion)* • *The roofing will be in a dark recessive non-reflective colour to minimise visual impact.* *4. Building massing will be designed to rationalise the different functions required and avoid visual clutter.* *6. Curved corners will be included, to soften the visual impact and attention will be applied to relationships between the component parts of the main structures to add interest and further reduce the perceived mass of the building.* *7. All materials proposed should be of high quality standards and allow for a curved corner detail.* The Applicant will consider these suggested amendments in due course as part of ongoing work with WCC, along with the other interested authorities, to seek agreement of the Converter Station Design Principles.
4.6.12	Commentary The proposal needs to be considered at several levels in terms of the role landscape impact plays. Firstly, on the position of the Converter Station relative to the substation and secondly, on the degree of landscape impact that will arise from the Converter Station in the location as proposed. There are planning policy considerations at both of levels and where relevant they will be identified in the assessment below. The Council has accepted the general methodology and identification of the key receptors. The Landscape Officers views are attached as appendix N.	The Applicant makes the following responses in relation to the landscape officer's comments as referred to in Appendix N. For consistency all category documents are listed. *Category 1:* • *No comment:* No response required from the Applicant. *Category 2: Layout Plans and Elevations*

Para No.	Local Impact Report Statement	Applicant's Response
		Indicative Converter Station Area Layout Plans: WCC states that these illustrate both Option B(i) and Option B(ii) and that Option B(ii) is preferred. The Applicant notes this comment. Option B(i) represents the worst case scenario in terms of landscape and visual effects and on landscape and visual grounds agrees that Option B(ii) is the more favourable option. • *Indicative Converter Station Elevations: WCC states that the scale would be more easily grasped by including vehicles / figures.* The Applicant will consider making these amendments if further revisions are required to the elevations. *Category 3: DCO* • *Draft DCO Schedule 2 and dDCO (REP1-021) no comments.* The Applicant notes that no comments are made. • *Schedule 12 "removal of important hedgerows" NB includes the hedges which layout Option B(ii) proposed to avoid.* Schedule 12 sets out all important hedgerows that may potentially be removed. It is not the case that it permits all to be removed where the relevant option which requires their removal is not selected, as that would then not be required in connection with the Proposed Development and would not be authorised by Article 41. *Category 4:* • *No comment.* No response required. Category 5 – Design and Access Statement: • Site Context and Selection: WCC states that it is accepted that Option B(ii) is the best site option and results in less visual impact than other options. The Applicant notes this comment. • *Consultation: WCC query whether the preferred strategy from the applicant is to screen and conceal the converter station as far as possible. They have questioned the lengthy discussions, why an option was introduced which sought to "celebrate the building" and the rationale for introducing baguettes, colour variations and texture if no one will get close enough to see them or if buildings are screened from most key public viewpoints.* The Applicant refers to the updated Design and Access Statement (REP1-031) and paragraph 4.3.12 of the SoCG with WCC (REP1-118) submitted at Deadline 1 which states that the Applicant is working with WCC, along with other interested authorities, to seek agreement of the Converter Station Design Principles. Design group meetings between the Applicant, the SDNPA, WCC and EHDC resumed in August 2020 and it was agreed that the aim of the design would be create visually recessive, simple buildings; blending into the landscape as much as possible. The Applicant confirms that it has not sought to promote the celebrating of the building

Para No.	Local Impact Report Statement	Applicant's Response
		at any point, however it has listened to comments from other LPA's who have sought such an approach in the past. • *Design development: WCC refer to colour and cladding and questions where or from what direction this visual interest would be appreciated.* The Applicant is seeking to ensure that in closer views (primarily those immediately around the edge of the Converter Station including views from private residential properties) views are as aesthetically pleasing as possible. From longer distance views the focus has been on ensuring the colour of both the elevations and roof is visually recessive. • *Converter Station design principles: WCC state that a key general Design Principle should be to visually screen and conceal the Converter Station however this is absent.* The Applicant as referred to in paragraph 4.3.12 of the SoCG with WCC (REP1-118) is seeking to work with WCC, along with other interested authorities, to seek agreement of the Converter Station Design Principles. The position in relation to landscaping in connection with the Converter Station Area is clearly detailed in the Outline Landscape and Biodiversity Strategy (REP1-034) and shown indicatively on the indicative landscape mitigation plans (at Figure 15.48 and 15.49 (APP-281 Rev002 and APP-282 Rev002 respectively) Option B(i) and (REP1-137) Option B(ii) submitted for Deadline 1. *Category 6 – Chapter 15 Landscape and Visual Amenity:* • *Methodology and key findings: WCC agree with the methodology of the LVIA and particularly the findings of the assessment as summarised in table 15.10 and the cumulative effects assessment –* The Applicant notes this response. • *Representative views / Colour: WCC accept that due to the topography viewpoints to the north, north west and north east do not break the horizon, however viewpoints to the south, east and west (VP7, VP10, VP11 and closer views VPA, B and C do break the horizon and are far more prominent. Whilst the landscape architect has illustrated these different types of views, the approach to cladding and colouring of the buildings by the architect (which is only illustrative) bears little relationship to this analysis. If the visual impact of the development is to be minimised then the colouring should be significantly darker with muddy grey /green /brown colours such as RAL 7043, 7010, 7009, 7039 and 7003 and would help reduce the significant adverse visual impact found to occur in many views. As referred to in the SoCG paragraph 4.3.12 submitted for Deadline 1 (REP1-118) design group meetings between the Applicant, the SDNPA, WCC and EHDC resumed in August 2020 to progress discussions on the proposed colour scheme.* The Applicant notes WCC wish for darker colour than any shown on the colour palette. The Applicant will continue to work with WCC, along with the other interested authorities, to seek agreement of the Converter Station Design Principles. • *Outline Landscape and Biodiversity Strategy – no comments.*

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		The Applicant notes this point and refers WCC to the updated Outline Landscape and Biodiversity Strategy (REP1-034) submitted at Deadline 1 which provides a clearer approach to the mitigations required to be provided..
	Concerning the closer detail of the landscaping proposed the Council has several points to raise. At Lovedean on Old Mill Road there is an unexplained section of the eastern boundary (due west of the Converter Station) where the roadside hedge does not appear to have been included as part of the DCO limits. It is understood that the precise nature of the roadside feature needs clarifying and following that, its inclusion or a reason why it is not included as part of the DCO is put forward. It is believed that this work is currently underway.	The existing length of hedgerow has not been included within the Order limits as is not deemed necessary to include this length of hedgerow in the Order limits in connection with the Proposed Development. This is because it is not considered this section of hedgerow referred to provides a meaningful screening benefit which in turn necessitates its inclusion in the Order limits such that it may be retained and maintained in connection with the Proposed Development.
	Clarification is also required that in the event of micro siting option B(ii) being adopted that the applicant will not rein back from the extent of the landscaping proposed on this side of the development	The Applicant confirms in the event that Option B(ii) is adopted the extent of landscaping proposed to the western side of the Converter Station will not be reined back. This is demonstrated by the updated landscape mitigation plans for both Option B(i) and B(ii) where additional areas of woodland have been introduced or extended - Figure 15.48 and 15.49 (REP1-036 and REP1-037 respectively) Option B(i) and indicative landscape mitigation plans for Option B(ii)(REP1-137) submitted for Deadline 1.
	One developing concern is the prevalence of ash dieback which carries the risk of hollowing out existing wooded areas and hedgerows. To combat this, any landscape management requirement should also include the ability to replace not just dead or dying new plants but the managed removal and replacement (with suitable native species) of any ash trees within the proposed landscape scheme that suffers from dieback. This is obviously necessary to maintain the coherence of the landscape screen.	The Applicant has commissioned an ash dieback survey further to SoCG meetings with SDNPA and will share the findings of the survey in due course. The dDCO (REP1-021) Schedule 2 Requirement 8 submitted at Deadline 1 has been revised to include a requirement that: "*All landscaping provided in connection with Works No. 2 and the optical regeneration stations within Works No.5 must be retained, managed and maintained during the operational period*". The Applicant's Response to ExA WQ 1 LV1.9.37 (REP1-091) and the updated Outline Landscape and Biodiversity Strategy (REP1-034) submitted for Deadline 1 provides a response in relation to replacement planting.
	<u>Conclusion</u> The extent of the study area and the assessment methodology are accepted by the Council. The optioneering process that resulted in the choice of the location of the converter station relative to the substation is accepted. Notwithstanding the intention to take control of an extensive area of features that would screen the site and also add to these, the nature and scale of the proposed building is such that sections of it will be visible in the surrounding area, even after 20 years. It is therefore essential that the landscape screen envelope is as extensive as it can be, that its management includes addressing the loss of trees through disease and that its retention and management is secured in the long term. The Council is not convinced that the initial set of Requirements meet these objectives. It is open to working with the application to address these areas.	It is acknowledged that the buildings will inevitably have a significant impact in close views, some of which, despite mitigation, will remain significant in the long-term. This is a consequence of an energy development such as this, as acknowledged by NPS EN-1. The extent of landscape mitigation is considered as extensive as it can reasonably be, taking into account the siting, operational and other relevant constraints. The Applicant considers that they provide reasonable mitigation where possible and appropriate to minimise harm to the landscape and visual amenity. The Applicant refers to the revised dDCO (REP1-021) and the updated Outline Landscape and Biodiversity Strategy (REP1-034) which include references to replacement planting for both existing and new planting within the Order Limits to maintain a visual screening function, a wider range of planting stock including a proportion of larger trees and additional planting within the Order limits. Additional new planting is referred to on the updated indicative landscape mitigation plans Figure 15.48 and 15.49 (REP1-036 and 037 respectively) Option B(i) and

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		indicative landscape mitigation plans for Option B(ii) (REP1-137) submitted for Deadline 1. An ash die-back survey has been commissioned and the Applicant will share the results in due course. The Requirements have been amended since their initial publication and now ensure both that the detailed landscape design is subject to LPA approval (including consultation with SDNPA) and that the landscape works are retained managed and maintained throughout the operational period. Specifically, Requirement 7 of the dDCO provides that no phase Works No.2 (the Converter Station) may start until the relevant LPA has approved the detailed landscape scheme. Requirement 8 provides that the landscape works must be undertaken in accordance with the approved scheme, that plant failures during a five year establishment period must be replaced like for like, and that the landscaping must be retained managed and maintained during the operational period.
	The sensitivities of the site are well known and recorded. The landscape officer has provided the following comments: *At 2.4.18 of the Consultation Document it is stated that 'Landscape mitigation will be provided in order to screen the building as effectively as possible'. And yet at Figure 11, where a view is shown from Viewpoint B at '20 Years Post Construction', the buildings are not 'screened' at all*.	Viewpoint B is at a field gate, a gap in the roadside hedge, one of the few places along Old Mill Lane where the buildings would be clearly visible. It was deliberately selected in order to illustrate the buildings in a close view and it shows Option B(i) as a worst-case scenario (it is nearer to the viewpoint than the favoured option B(ii)). As stated by the landscape officer, the mitigation planting is designed to screen the buildings as effectively as possible. From most of Old Mill Lane, adequate screening is provided by the roadside hedges, most of which are included in the Order Limits to allow reinforcement where necessary in the short-term and to ensure their long-term management. To fully screen this particular view through a gap in the hedge would require a woodland belt 25m high, and the planting in this view is designed to reach 25m in height at maturity. The Applicant refers to the response provided at Deadline 1 in relation to WCC's Relevant Representation (RR-198) which explains that the aquistion of rights over existing landscape features is being sought to ensure that the existing landscaping which serve a screening function can be adequately enhanced and maintained in the future (secured by Requirement 8 of the dDCO (REP1-021)).
	The draft mitigation plan at figure 10 on page 36 shows the proposed converter station taking out a substantial belt of woodland. If the footprint were moved just 25m further east this existing 'screening' could be retained.	The draft mitigation plan referred to (which dates from February 2019, prior to submission of the DCO application) shows Option B(i), which does entail the loss of a substantial belt of hedgerow trees. This is one of the key drivers behind the Applicant progressing Option B(ii) which is located further east and retains this hedgerow / mature hedgerow tree belt.
	If a decision is taken to screen the building as far as possible, as a principle of design from the outset of the project, given the environmental sensitivity of it's location, then considerably more effort will be required, both to retain existing woodland and conceal the building using planted bunds or earthwork. There is still an expectation that the footprint could be set at a lower level. There is nothing in the soils or groundwater chapters to show why this is not feasible with the resultant material then used as part of any landscaping scheme	The retention of existing hedgerows / hedgerow tree belts and woodland, within the constraints of siting, operational and other relevant constraints has always been a basic principle of the mitigation design as referred to in the Design Principles in the updated DAS (REP1-031). The extent of earthworks and bunds or reprofiling is the maximum that is possible given the constraints of groundwater protection. It should also be noted that SDNPA have expressed a view that 'bunds' would not be appropriate in this landscape.

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		The Applicant has sought to site the Converter Station in the most appropriate location to allow for the landscape impacts to be minimised. The buildings are located in a groundwater protection area (which extends for a much wider than the Converter Station Area), and they have been designed to sit as low as possible without adversely affecting the underlying principal chalk aquifer (the large chalk aquifer under much of the surrounding area) (see paragraph 3.6.3.43 of APP-118). The Applicant considers that an appropriate and proportionate approach has been taken to the landscape mitigation measures. As discussed above, existing planting surrounding the Converter Station which serves a visual screening function now falls within the Order Limits and measures have been taken to ensure their reinforcement where appropriate and their retention and management in accordance with Requirement 8 of the dDCO (REP1-021).
	If on the other hand a design decision is taken that efforts to 'screen' the building will be futile, then the design and appearance of the building assume greater importance, particularly as it will be viewed from within the National Park.	The Applicant rebuts the suggestion that "*efforts to 'screen' the building will be futile"* but acknowledges that the buildings will be visible (albeit less in the long-term as mitigation planting matures), and has therefore put substantial effort into the building design. Whilst the form of the buildings of necessity reflect their function they have been carefully designed to be of interest where they are visible at close range, whilst being visually recessive when viewed from further afield. The Applicant refers to the updated Design and Access Statement (REP1-031) and paragraph 4.3.12 of the SoCG with WCC (REP1-118) submitted at Deadline 1 which states that the Applicant is working with WCC, along with other interested authorities, to seek agreement of the Converter Station Design Principles. To this end, Design Group meetings between the Applicant, the SDNPA, WCC and EHDC resumed in August 2020 and are held regularly.
	However, I remain unconvinced that the colours chosen will ever 'blend' with a constantly changing landscape. The colours in the landscape change with different weather conditions, different seasons, different lighting conditions and even different times of day. Attempts to blend with the landscape by mimicking its colours are rarely successful. It is recommended that instead, Aquind choose visually recessive tones or darker colours which have the effect of reducing the apparent bulk of the building, for example • RAL3007 Black Red • RAL 5008 Grey Blue • RAL 6009 Fir Green • RAL 6015 Black Olive • RAL 7021 Black Grey • RAL 8019 Grey Brown.	As stated in the Applicant's response to WCC's Relevant Representation, at Deadline 1 (RR-198) a further design meeting was held on 25 August 2020 with WCC, SDNPA and EHBC to progress discussions around the cladding colours. At the meeting on 25 August 2020 it was agreed that a further design meeting will be held in due course to discuss a revised colour palette. The status of these ongoing discussions will be reflected in the SoCGs with the respective local authorities as they progress.
	The landscape impact needs to be considered as part of the overall design issue and WCC will continue to respond positively to any invitation to discuss this further. Within the Consultation document there is an annotation on Figure 15.9	As noted above, the Applicant is taking measures to ensure that existing vegetation within the Order Limits will be retained and managed in accordance with Requirement 8 of the dDCO (REP1-021).

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	(Landscape Mitigation Plan) to planting beyond the red lined application site but no indication how this is to be achieved. In a similar vein, the photomontages from the viewpoints rely on vegetation to screen the view, but offer no indication of how that vegetation will be retained and maintained. An opportunity exists for the applicant to adopt the concept of the Environment Fund which has been raised at a previous meeting. This would be a mechanism to achieve or retain the off site planting referred to above.	The Applicant is willing to enter into discussions regarding valid section 106 obligations, however the provision of a general Environment Fund is not considered necessary to make the proposal acceptable in planning terms. Any section 106 obligation will need to satisfy the relevant legal tests.
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	This option, rather than Option B (i), should be the option which the Council pursues because, as well as their connective ecological value (ref WCC Ecology comments?), these hedgerows and trees would also assist in screening the converter station, particularly from viewpoints to the west.	The Applicant notes this comment. Option B(i) represents the worst case scenario in terms of landscape and visual effects and on landscape and visual grounds agrees that Option B(ii) is the more favourable option and is being actively persued with National Grid.
	2.8 'Indicative Converter Station Elevations': these would benefit from recognisable graphic 'entourage' such as occasional trucks or human figures, so that the scale of the Converter Station can be more easily grasped.	The Applicant will consider making these amendments if further revisions are required to the elevations.
	Schedule 12 –'removal of important hedgerows' NB includes the hedges which layout Option B(ii) proposes to avoid.	Schedule 12 sets out all important hedgerows that may potentially be removed. It is not the case that it permits all to be removed where the relevant option which requires their removal is not selected, as that would then not be required in connection with the Proposed Development and would not be authorised by Article 41.
	4. Consultations It is assumed from this comment that the preferred strategy of the applicant is to therefore screen and conceal the converter station as far as possible. If this is the case, then it is difficult to understand: • Why the 'Landscape and Visual Amenity Briefing Meetings' have been so laboriously focussed on the colour palette for the converter buildings? • Why a colour option was introduced which 'sought to celebrate the building'? (DAS 4.3.3.2); & • What the rationale is for introducing 'baguettes', colour variations and texture if no one will get close enough to see them, or the buildings are screened from most key public viewpoints?	The Applicant refers to the points made above under 4.6.12, in the updated Design and Access Statement (REP1-031) and paragraph 4.3.12 of the SoCG with WCC (REP1-118) submitted at Deadline 1 which responds to the focus on colour, the difference of opinions between LPA officers over whether the building should be visually recessive or "celebrated" and the rationale for baguettes / cladding in response to close range views. The Applicant is continuing to work with WCC, along with other interested authorities, to seek agreement of the Converter Station Design Principles. Design group meetings between the Applicant, the SDNPA, WCC and EHDC resumed in August 2020 and it was agreed that the aim of the design would be create visually recessive, simple buildings; blending into the landscape as much as possible. The Applicant confirms that it has not sought to promote the celebration of the building at any point, although it has listened to comments from other LPA's who have sought such an approach in the past.
	5. Design development The architects have considered different design approaches, including WCC's preference for darker, less reflective colours (as stated at meetings on 15th October 2018, 21st June 2019 and 10th July 2019) but in the DAS are suggesting that, at a meeting with the authorities on 20th August 2019, 'an autumnal palette was preferred by general consensus' and are consequently proposing a range of	The updated Design and Access Statement (REP1-031) does refer to "autumnal" colours which was what was agreed at the meeting on 20th August 2019. The photomontages presented are indicative and in discussions with the LPAs in August 2020 it was explained that it was diffcult to capture the appearance of the colours and the buildings would not appear "bright" in reality. As referred to above and in paragraph 4.3.12 of the SoCG with WCC (REP1-118) submitted for Deadline 1 the Applicant will continue to work with WCC, along with other interested authorities,

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	bright, warm 'autumnal' colours (RAL 8001-8015 and 8023-8028) arranged on vertical metal fins, intended, they say, to 'compliment the surrounding landscape, break up the mass of the building and provide visual interest' (5.3.3.2).	to seek agreement of the Converter Station Design Principles. Further work is being undertaken to review the colour palette.
	But the DAS doesn't say from where or from what direction this 'visual interest' would be appreciated. It is questioned therefore what the validity or purpose of this exercise is.	As referred to above the "visual interest" is in response to close range views (including those from private properties) and is from different directions around the site.
	6. Converter station: The design principles It is assumed from earlier statements that a key general Design Principle should be, as far as possible, to visually screen and conceal the converter station; however this is absent from the list of design principles.	The Applicant refers to paragraph 4.3.12 of the SoCG with WCC (REP1-118) which states that they are seeking to work with WCC, along with other interested authorities to obtain agreement of the Converter Station Design Principles. Irrespective of this, the indicative landscape mitigation plans Figure 15.48 and 15.49 (APP-281 Rev002 and APP-282 Rev002 respectively) and landscape mitigation plans for Option B(ii)(REP1-137) submitted for Deadline 1 clearly set out the approach to landscaping, with the final landscaping scheme to be approved in accordance with the OLBS (REP1-034) as per Requirement 7 of the dDCO (REP1-021).
	Currently there seems to be a discontinuity between the landscape and visual impact assessment, the viewpoint analysis and the design development for the building as set out in the DAS.	The Applicant notes this response and, as outlined above, the Applicant is discussing this as part of the ongoing design meetings with the LPAs to agree a consensus going forward which reflects the LVIA and viewpoint analysis and which will inform the design development.
	Having studied these viewpoint illustrations, I accept that due to the topography of the area, the two converter halls tend not to break the horizon in views from the more elevated viewpoints to the north, north west & north east (particularly from representative elevated viewpoints within the SDNP). But in representative viewpoints from the south, east and west, including views from within the Winchester District (i.e., VP7, VP10, VP11, and more close up views VPA, VPB and VPC) they do break the horizon and are far more prominent. This is a significant difference.	The Applicant agrees that from some viewpoints, particularly close up views A, B and C the Converter Station does appear more prominent. This is why providing "visual interest" has been considered as part of the building design through the use of cladding, curved corners and colour (please refer to the updated DAS (REP1 -031) submitted at Deadline 1). It should be noted that the ES Chapter 15 (APP-130) acknowledges that there will be significant visual effects local to the Converter Station, some of which cannot be fully mitigated. However, as acknowledged by NPS EN-1 virtually all nationally significant energy infrastructure projects will have effects on the landscape, and this should not be the basis for refusal where the design and landscaping has been appropriately considered, as is the Applicant's position that it has been..
	There is a concern therefore that while the landscape architect has illustrated these different types of view, the approach to cladding and colouring the buildings by the architect (whilst only illustrative at the moment) bears little relationship to this analysis.	Noted and as outlined above the Applicant is discussing this as part of the ongoing design meetings with the LPAs.It is not agreed that the approach to cladding and colouring the buildings by the architect (whilst only illustrative at the moment) bears little relationship to the assessment undertaken.
	For example, if one considers the illustrative view from viewpoint 'B' to the SW on Old Mill Lane (6.2.15.36ES Vol 2 – Figure 15.36) it will be seen that the current indicative colour strategy is not successful. The converter station halls would be prominent and incongruous in the landscape.	As discussed above is in the process of reviewing the colour palette in discussions with the LPAs. The photomontages presented are indicative and in discussions with the LPAs in August 2020 it was explained that it was diffcult to capture the appearance of the colours and the buildings would not appear bright in reality. As referred to in the points made above the Applicant is working with the LPAs to review the colour palette as part of Building Design Principle 3.

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	If it is an agreed objective to minimise the visual impact of the development, then colouring should be significantly darker. In fact we made this comment in our 10th July 2019 meeting with WSP.	As referred above will continue to work with WCC, along with the other interested authorities, to seek agreement of the Converter Station Design Principles.
	It is suggested therefore that muddy dark grey/green/brown colours, such as RAL 7043 RAL 7010 Darker to lighter RAL 7009 RAL 7039 RAL 7003 should be considered. These colours would allow the converter station halls to appear to be more rooted in the ground than floating above it and would considerably reduce the significant adverse visual impact which has been found to occur in many of these views.	The Applicant notes WCC wish for darker muddy grey colours than any shown on the colour palette and a divergence from colours previously suggested by WCC. The Applicant will continue to work with WCC, along with the other interested authorities, to seek agreement of the Converter Station Design Principles.

Table 7.7 – Applicant's Comments on Winchester City Council Local Impact Report – Arboriculture

Para No.	Local Impact Report Statement	Applicant's Response
4.6.16	The application lacks sufficient clear and precise detail on the degree of impact that will result to hedgerows and trees as a result of the cable installation and vehicle access formation. The broad approach as set out in the application places an unacceptable risk on too extensive an area of vegetation. The application sets out the extent of any physical impact on hedgerow or trees to those contained within the Development Consent Order limits. The worst case scenario is adopted which means that any feature identified as within the DCO limits is at risk. The application does indicate an intention to avoid harm to features as work progresses. The application detail Hedgerow and Tree Preservation Order Plans (APP-018) identifies those hedgerow and Trees at risk. These show 18 important hedgerows and a number of TPO trees, some within the Order limits, other just outside.	The Applicant has submitted an updated OOCEMP (REP1-087) and OLBS (REP1-034) at Deadline 1. Updated tree constraints plans and tree survey schedule were also submitted at Appendix 10 to the Applicant's response to ExA WQ1 (REP1-101). These documents provide a more refined position on tree retention and mitigation. The OOCEMP requires the production approval and compliance with detailed Arboriculture method statements at the detailed design and construction phases. The Applicant therefore considers that sufficient information is provided with respect to the potential impact on hedgerows and trees as a result of installation of Onshore Cable Route and the mitigations that are required to be adhered to in this regard.
	The proposals for the cable circuits to exit the Kings Pond Meadow frontage to Anmore Road whilst also accommodating an access needs further clarify regarding its impact on the existing hedgerow on the south side of the road. On the northern side, there is a tree protected by a TPO which should be left unharmed. Clear information confirming the width of the leeway available on the eastern side of this tree should be presented. The need to examine this section more carefully is heightened by the possibility of one of the cable circuits making a right hand turn onto Anmore Road. The limited flexibility in the cables may result in the need for a gentler curve that will cut through a wider section of the hedgerow as it leaves the meadow. If one of the cable circuits did travel down the Anmore Road for a short distance it would require loss of hedgerow as it turned north again. The plans also show an access in	The Order limits in the vicinity of Anmore Road have been amended, resulting in a single crossing option for both circuits between Kings Cottage and Lavender House. The Applicant intends to not impact the tree subject to a TPO in this location. Works in proximity to the tree will be closely governed by an Arboriculture Method Statement to be submitted for approval as part of the OOCEMP (REP1-087) secured by Requirement 15(2)(c)(iv) of the dDCO (REP1-021). Please see Appendix 10 Tree Survey Schedule and Constraints Plans for refined tree retention detail (REP1-101).

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	this section of hedge (AC/2/c) and the same point as made previously applies regarding whether a circuit can also utilise a vehicle access gap.	
	The Council is looking to the applicant to remove the east option and take the cables straight across the Anmore Road. If not, then a clear justification is required. In view of the restrictions on the cable approach towards the Anmore Road as it crosses the SINC the applicant should also provide greater clarity on the cable route relating to the Anmore Road crossing and the implications on boundary features north and south of the road.	The Order limits in the vicinity of Anmore Road have been amended to remove the eastern option, resulting in a single crossing option for both circuits between Kings Cottage and Lavender House. Section 6.4 of the updated Onshore Outline CEMP (REP1-087) provides further detail on the approach to works and mitigation in the SINC and Denmead Meadows/Kings Pond south of Anmore Road.
	To provide an appropriate level of confidence that the cable installation will not result in an unnecessary level of detrimental impact on existing landscape features, the applicant is requested to refine the proposals at both the Hambledon Road and Anmore Road parts of the route. The resultant details should then be included within the requirements and contractors required to work within those parameters. Replacement planting will not be like for like as trees cannot be planted within 5m of the cable route. Even those section of hedgerow that are replanted will take years to make the same level of contribution to local character. The applicant should therefore mitigate for that lost character and biodiversity value by additional planting elsewhere.	The Applicant refers to the responses above in relation to the necessity of the land included at Hambledon Road and the removal of the option to trench along Anmore Road. The Applicant is confident that by following the measures outlined and secured in the Outline Landscape and Biodiversity Strategy (REP1-034) the impacts on trees and hedgerows will be minimised, and that replacement planting will be appropriate to mitigate the impacts where vegetation is lost.

Table 7.8 – Applicant's Comments on Winchester City Council Local Impact Report – Biodiversity

Para No.	Local Impact Report Statement	Applicant's Response
4.6.13	The comments of the Ecology officer are attached as appendix P.. A general comment that applies universally is a concern relating to the lack of information in terms of baseline habitat and then clear details of the amount lost, proposed replacement and the degree of enhancement that will take place. The submission of a Biodiversity Metric covering these areas has been discussed with the applicant and is underdevelopment. An integral part of the local plan policy is to see enhancement to biodiversity. The Council is aware that the new Environment Act will exclude NSIPs from the concept of applying biodiversity net gain to developments. However, there is support for enhancement from a number of sources. Firstly, the Natural Environment & Rural Communities Act 2006 Section 40 which includes a direct reference to local planning authorities to seek enhancement. Secondly, NPS EN-1 para 5.3.4 says "the applicant should show how a project has taken advantage of opportunities to conserve AND (my emphasis) enhance biodiversity and geological conservation interests". Thirdly, the NPPF paragraph 174 supports the concept of enhancement. Finally, LPP1 Policy CP16 (Biodiversity) also promotes enhancement as part of any submission.	The recently submitted Biodiversity Position Paper (REP1-138) details the position with regard to local and national policy and the actions taken to avoid, minimise and remediate potential impacts on biodiversity. These actions result in bespoke management (at Denmead Meadows) and net gains for all habitats of principle importance (priority habitats).

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	Lovedean Figure 6.10.1 the Outline Landscape and Biodiversity Strategy Management Plan (APP-506) shows the indicative level of new planting to be undertaken. In the description of the area, the Council has identified the poor number and condition of east-west connectors through which wildlife can move across the area. One of the few existing east-west hedgerow will be lost to the proposal. The applicant is proposing to replace this with a new hedge PH-2. This appears to be a standard two rows of new hedge plants. This will connect what to the west is a broad belt of vegetation to the broad belt of vegetation on the eastern side where an existing hedgerow has been reinforced with new planting by the National Grid. The Council is mindful of the height and proximity restriction the applicant has imposed on new planting. However, it is the Councils view that still keeping within these restrictions it is perfectly possible for PH-2 to be thickened up with additional planting on its southern side. This would create an enhanced feature that would reinforce the landscape screen and enhance habitat/biodiversity and connectivity.	The east-west hedgerow connections proposed by PH-2 within the revised Outline Landscape and Biodiversity Strategy Management Plan (APP-506 rev002) will offset the loss of existing hedgerows to construction of the new converter station. This is augmented by new woodland planting (PW-5) approximately 70m to the north which forms a new east-west link, enhancing the overall connectivity of the converter station area. Revisions have been made to the indicative landscape mitigation plans Figure 15.48 and 15.49 (APP-281 Rev002 and APP-282 Rev002 respectively) and landscape mitigation plans for Option B(ii)(REP1-137) submitted for Deadline 1 which widen the hedgerow in this location.
	Mindful of the weak east-west links, the Council would like to see additional actions taken to enhance them. To the north of PH-2 it is proposed to create a screen barrier PW-5. On the eastern side this would link up with a north south hedgerow EH-8. To the east of this is an area of woodland (EH-5) which the plan indicates would be thickened up (PW-1/PW-2/PW-3). Connecting PW-5 to this enhanced area of woodland (even if space is needed for a field entrance) would improve east –west connectivity.	East-west planting in the form of PH-2 and PW-5 provide enhanced habitat links over that existing in the landscape currently and represent an enhancement of connectivity for biodiversity. The Applicant has discussed the opportunity to introduce a further east west link – east of EH8 as referred to in paragraph 4.3.7 of the SoCG with WCC (REP1-118). Previous comments in this regard are that this planting would sever the existing arable field. It is not considered that the benefits of such planting would outweigh the impacts of needing to acquire this land which is Grade 3a, and it is not considered the landscaping is of such necessity it would be appropriate to justify the acquisition of the land required to provide it. Revisions have however been made to the indicative landscape mitigation plans Figure 15.48 and 15.49 (APP-281 Rev002 and APP-282 Rev002 respectively) and landscape mitigation plans for Option B(ii)(REP1-137) submitted for Deadline 1 which extend the woodland (PW-5) in this location allowing for access and maintenance.
	South of the new access roadway the plan shows a new standard hedge (PH-3). It is considered that this would benefit wildlife if it was formed more as a linear belt rather than two rows of hedge plants. As well as enhancing connectivity, this reinforced belt would also reinforce the screening of the new roadway that is to be a permanent feature from views from the nearby footpath. Furthermore, an enhanced link should be made to new planting areas PH-8 and PW-17 which again would enhance east-west connectivity.	Planting south of the new Access Road comprises a mixture of habitat types, including hedgerows, woodland and scrub planting which link new and existing vegetation around the Converter Station to Ancient Woodlands including Stoneacre Copse. This new planting represents an enhancement to connectivity over that which is already present. In relation to the suggestions for planting south of the new standard hedge PH-3, the Applicant does not considered that the benefits of such planting would outweigh the impacts of needing to acquire this land which is Grade 3a, and it is not considered the landscaping is of such necessity it would be appropriate to justify the acquisition of the land required to provide it. Revisions have been made to the indicative landscape mitigation plans Figure 15.48 and 15.49 (REP1-036 and 037 respectively) and landscape mitigation plans for Option B(ii) (REP1-137)

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		submitted for Deadline 1 which extend the woodland (PW-17), whilst still allowing for access and maintenance.
	As a general observation, new planting is by common consent immature and does not offer the same level of landscape presence or habitat value as existing features do. Reinforcing new planting will help mitigate for these losses.	The time taken for new planting to mature has been recognised and allowed for within the impact assessment and mitigation in ES Chapter 16 Onshore Ecology (APP-131) (e.g. see paragraph 16.6.1.15 and 16.6.1.17 et al.) and updated Outline Landscape and Biodiversity Strategy (OLBS) (REP1-034) submitted at Deadline 1. The updated OLBS (REP1-034) at paragraph 1.6.7.1 recognises the need for a mix of plant stock (of local provenance where practicable) including larger trees in specific locations and native 'pioneer' species to create variations in the woodland structure and mix. This will help provide early 'landscape presence'. Requirement 7 of the dDCO (REP1-021) which requires a detailed landscaping scheme includes specific reference to the location, species, size, planting protection measures and planting density of any proposed planting. The detailed landscaping scheme will require approval from the discharging authority in consultation with SDNPA.
	At Lovedean a quantity of wood will be generated from clearance and the potential for this to be used to form habitat piles should be incorporated into the future management plans.	This comment is noted and the Applicant is further considering this.
	<u>Kings Pond/Soake Farm Meadows</u> Based on the submitted details, there is a lack of information on how the application will establish the southern drilling compound and then reinstate the ground afterwards. At the northern end, the justification for trenching through the SINC is consider to be lacking. There is an absence of clarity of the impact on the SINC of establishing a vehicular access off Anmore Road and across the SINC to service the drill recovery compound that will be formed adjacent Soake Road. This is shown coloured yellow on Land Plans sheet 3 of 10 (APP-010). The applicant's view that this designated area holds low interest does not mean its value has been lost completely. Under a different grazing regime it may recover. However, its excavation would undoubtedly destroy a large part of that latent potential.	ES Chapter 16 Onshore Ecology [APP-131] evaluates Denmead Meadows, which incorporates Kings Pond Meadows SINC and (recognised in the recent ES Addendum) Soake Farm SINC as being of National importance. Mitigation commitments that will restore the botanical communities habitats temporarily lost due to construction to their pre-construction state are outlined within ES Chapter 16 Onshore Ecology [APP-131] and further detail has been provided on these measures in the ES Addendum (REP1-139).
	Finally, in the event that the cable route was to follow the Anmore Road to the east, it has not been clarified if this will have implications on the approach of the cable trenches towards the Anmore Road. It is understood that the cable has limited flexibility and so a larger radius trench may be required if it is to go eastward on Anmore Road. Swinging out to make such a turn may then take the trenches closer to the water courses and potentially impact on the surface or near surface hydrology at this end of the meadow	The Order limits in the vicinity of Anmore Road have been amended, removing the route that was to follow the Anmore Road to the east and resulting in a single crossing option for both circuits between Kings Cottage and Lavender House.
	<u>Conclusion</u>	The Council is referred to the responses above. It is strongly refuted that the Application has at any point lacked sufficient data regarding the existing baseline.

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	At the present time the formal submission is lacking in detail regarding the existing baseline, what habitat would be lost, replacement habitat to be created and what element of this could be classified as enhancement. The Council wishes to see additional actions at Lovedean that would address an apparent weakness in east – west connectivity for the benefit of wildlife. Regarding the meadows areas, in view of the environmental sensitivities associated with this land, a greater amount of detail is considered necessary relating to the establishment of the two compounds and associated works. The justification for forming an access and laying two open trenches across a section of the designed SINC at the northern end needs greater justification. Its downgrading as a result of the current grazing management fails to consider its potential to return to good condition if the management regime changed. These matters are under discussion with the applicant and it is hoped to make progress on them shortly.	The comments in relation to east-west connectivity in respect of the landscape to be provided at the Converter Station have been carefully considered and the Applicant has clearly set out how wildlife connectivity has been appropriately taken into account and measures of actual benefit to wildlife connectivity have been incorporated into the indicative landscape mitigations proposals, with the required measures secured through the Outline Landscape and Biodiversity Strategy (REP1-034). Discussions in relation to the mitigation measures to be provided for in connection with the works in the proximity of Kings Pond and Soake Farm Meadows are matters which have been under discussion with Natural England. Further information in this regard is provided in in the ES Addendum (REP1-139).
	The risks to vegetation arise from both cable installation and from the formation of vehicle access points. The worst case scenario is adopted in the assessment which means that any feature identified as within the DCO limits is at risk. Whilst it is noted that the application does indicate an intention to avoid harm to features as work progresses, the final decision in terms of cable installation and presumably the vehicle access points will be up to the appointed contractor. This will presumably include not just the vehicle access space but also any necessary visibility splay. Whilst replanting is offered, this is not like for like and would in any event take years to mature.	In respect of replacement replanting, the Applicant refers to response to ExA WQ 1 MG1.1.17 (REP1-091) provided at Deadline 1. Further, the Applicant refers to the updated Outline Landscape and Biodiversity Strategy (REP1-034) and the mitigation measures associated with the Onshore Cable Corridor in Section 1.5. Paragraph 15.4.7.2 bullet point 6 of the Landscape and Visual Impact Assessment (LVIA) (APP-130) states "[A]ll planting lost will be replaced with like for like species where practicable and in agreement with the relevant discharging authority." The wording in the updated Outline Landscape and Biodiversity Strategy has been revised in paragraph 5.1.3 and 5.3.2 to replicate this statement for mitigation measures associated with the Onshore Cable Route and to add that trees should be positioned at least 5 m away from the cable route and more specifically the cable trench within the Order Limits.
	Chapter 16 Onshore Ecology	
	The evidence base that is outlined gives the impression that it has recorded evidence of animal species as static features and no consideration in the predicted impacts appears to have been given to the implications of the compound acting as a barrier to the movement/migration of species across the land, or the use of the "airspace" by birds or bats. This applies to both the construction phase when the affected area will include the compound/laydown area and during the operational phase when the site will be secured by wire mesh fencing.	Impacts of the Proposed Development have been assessed within ES Chapter 16 Onshore Ecology (APP-131) and have inlcudes consideration of habitat fragmentation. The assessment does not consider mobile species as immobile. The evidence base supporting the impact assessment, and the assessment itself both take into account the fact that animal species move both at ground level and through the airspace above. The question references a compound acting as a "barrier to movement/migration of species across land , or the use of the "airspace" by birds or bats", but does not state which compound is being referred to. Effects of placement of all compounds have formed part of the assessment within ES Chapter 16 Onshore Ecology (APP-131), and has covered both the construction and operational phase of the Proposed Development.
	No consideration is outlined regarding the implications on biodiversity of constructing the access road which is to be retained during the operational phase. A 7.3m concrete road will form quite a barrier severing movement from the open land to the south and west towards Stoneacre Copse which is an the	Impacts of the Proposed Development, including the access road referenced, have been assessed within ES Chapter 16 Onshore Ecology (APP-131). Fragmentation effects have been considered as part of this assessment. Landscape planting has been designed to offset such effects, and is described within the Outline Landscape and Biodiversity Strategy (APP-506 Rev 002).

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	ancient woodland. This applies to both the construction phase and the operational phase.	
	WCC considers that the scheme should incorporate a greater degree of mitigation work and is open to working with Aquind in identifying the extent and scope of that work before the formal submission stage. As part of that position, WCC considers it would seem sensible to "future proof" the analysis by factoring into the proposal some biodiversity net gain. This is referring to the proposal to require all development to result in a positive improvement in biodiversity. This goes beyond any mitigation proposed. It seems this requirement is likely to be in force when the examination stage is reached following changes to regulations which are currently being reported in the press.	Mitigation sufficient to offset the likely effects of the Proposed Development has been included within ES Chapter 16 Onshore Ecology (APP-131). This has been updated by ES Addendum Chapter 10 (REP1-139). The recently submitted Biodiversity Position Paper (REP1-138) details the position with regard to local and national policy and the actions taken to avoid, minimise and remediate potential impacts on biodiversity. These actions result in bespoke management (at Denmead Meadows) and net gains for all habitats of principle importance (priority habitats).
Appendix P Ecology comment		
CATEGORY 2		
-Document Ref: 2.7 Application document reference 2.7 Indicative Converter Station Area Layout Plans Option B(i) Comments: Ancient woodland is directly adjacent to proposed development. NPPF 2018 supports a buffer of a minimum of 15m from ancient woodland.		Embedded mitigation commitments within ES Chapter 16 Onshore Ecology (APP-131), and secured through Requirement 15 of the dDCO (REP1-021), include a 15m buffer between works compound areas and Ancient Woodland.
CATEGORY 3		
Document Ref: 3.1 Draft Development Consent Order (DCO) Part 7 Miscellaneous and general Comments: Paragraph 41.1. states that "The undertaker may fell or lop any tree within or overhanging the order limits". Para 41.4.(a) states that the undertaker can "remove any hedgerows within the Order Limits" and 41.4. (b) "remove important hedgerows as are within the Order limits". These operations should be approved by WCC (or other relevant authority in that area) prior to undertaking.		All operations will be required to be approved; as no such works can be carried out until approved in accordance with the relevant requirements. The Articles are authorising powers. They are subject to the controls otherwise provided for in the DCO.
Paragraph 42.1 states that "The undertaker may fell or lop any tree described in column (1) of Schedule 11". Prior to any felling or work on trees and removal of hedgerow it shall be shown that no protected species will be impacted by the proposed works. Schedule 2. 23 States that "During the operational period there will be no external lighting of Works No.2 during the hours of darkness save for in exceptional circumstances, including in the case of emergency and where urgent maintenance is required". What is the definition of urgent maintenance?		No definition of urgent maintenance is considered to be required as it will be self-evident when matters are urgent rather than routine. It is also considered that it is not possible to draft a meaningful definition which is adequately inclusive of all such works which may be urgent maintenance works without unintended adverse consequences. The Requirement is considered to be clear and precise and adequate to control operational lighting during the hours of darkness.
CATEGORY 6		

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	Document Ref: 6.1.2 Environmental Statement Chapter 2 Consideration of Alternatives Comments: Table 2.1 states that "burying cables as opposed to building overhead lines ('OHLs') removes the associated visual impacts". It is likely that burying cables has the potential to cause more ecological impacts than OHLs. It also states "Highway installation reduces impacts on ecology, archaeology and associated designations" and this implies that the cross country route could lead to ecological impacts, and this is especially true when related to the Denmead Meadows King's Pond Meadow SINC.	The Applicant did not and does not consider it is appropriate for the cables to be overhead lines. It is not considered doing so would comply with national policy, or that the associated impacts would be in any way acceptable. The Applicant does not consider that this point warrants any serious consideration.
	Section 2.4.6.5 states "avoidance of environmental designations/constraints" in the positioning of the Lovedean station and connecting cable. The Denmead Meadows and King's Pond meadow SINC may not have appeared to be of high significance, but do include 8ha of Priority Habitat NVC classification MG5, plus MG6 and MG7. This area supports over 6,000 spikes of Green winged orchid (GWO – a Red Data List species – classified as vulnerable – considered to be facing a high risk of extinction in the wild) which is a notable species, and this is reputed to be the largest population in the region. This area also supports at least another six other neutral grassland indicator species including Adder's tongue.	The Applicant acknowledges that the unimproved grassland is a botanically diverse un-grazed hay meadow, and surveys by both WSP and wildlife groups identify this area to be botanically diverse, supporting important plants such as green-winged orchid and adders-tongue fern. See Appendix 16.4 (Non-Statutory Designated Sites Report) of the ES (APP-412). A pre-construction survey is currently scheduled for Spring 2021 to establish green winged orchid population in the lowland meadow habitat. Suitably qualified botanists shall carry out direct counts of green winged orchid plants present.
	Section 2.4.10.2 states "Environmental constraints in proximity to Lovedean Substation e.g. proximity to the SDNP, areas of residential development, heritage assets, presence of Ancient Woodland and SINCs" as key considerations in refining the siting of the converter station. Has this been undertaken satisfactorily, as SINCs seem to have been omitted in this consideration	SINCs were considered with respect to siting of the Converter Station. The substation site is surrounded by fragments of Priority Habitat in the form of deciduous woodland at Crabdens Copse, which is designated as semi-natural Ancient Woodland and a SINC. SINCs were also considered with respect to the cable route options, which is set out in further detail in the Supplementary Alternatives Chapter (REP1-152).
	Table 2.4- Environmental Effects with Converter Station Options A – D. These effects should be measured on a local scale, as opposed to a national scale.	These options were considered on a local scale, taking into account the local context and proximity to nearby sensitive receptors and natural features.
	Document Ref: 6.1.16 Environmental Statement – Volume 1 – Chapter 16 Onshore Ecology Comments: Section 16.1.2.1. states that dormouse, reptile and badger surveys were undertaken around the Converter Station Area and around the northern section of the Onshore Cable Corridor, does this mean that suitable habitat along the cable route has not been considered for impact on these protected species? Great crested newt – A Study Area of 250 m from the Order Limits has been used to search for waterbodies in the assessment of great crested newts. Natural England Guidance states that ponds up to 500m of a development should be considered as terrestrial habitat and connectivity of ponds are of importance to GCN.	Study areas for protected species including dormouse, reptiles, badger and great crested newt follow are defined in section 16.1.2 of ES Chapter 16 Onshore Ecology (APP-131) and reflect an appropriate level of survey to inform the baseline for assessment of impacts. Study areas have been defined based on the presence of suitable habitat within the zone of influence of the Order limits as a whole; they cover all 10 Sections of the Proposed Development and have been subject to consultation with relevant statutory consultees, particularly Natural England (see ES Chapter 16 Onshore Ecology (APP-131) paragraph 16.1.2.1). With respect to great crested newt specifically, the rationale for the Study Area chosen for survey is justified in ES Chapter 16 Onshore Ecology (APP-131) paragraph 16.1.2.4, complies with current Natural England guidance and has been subject to consultation with this statutory consultee.
	Has botanical survey been considered in certain areas such as Denmead Meadows where there is significant importance including the Kings Pond meadow SINC which hosts a regionally-important Green-winged orchid site (classified as Near Threatened on the Vascular Plant red Data List for Great Britain).	Detailed botanical surveys were undertaken at Denmead Meadows and results are reported by ES Appendix 16.4 Non-Statutory Designated Sites Report (APP-412). Data collected by the surveys informed the assessment of impacts within ES Chapter 16 Onshore Ecology (APP-131).

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	Section 16.8.2.3 relates to mitigation and enhancement measures for the Denmead meadows and states works areas will be securely fenced and procedures put in place to prevent damage to grassland habitats adjacent to them (e.g. by the use of Herras fencing). These areas will have to be mapped and the boundaries approved prior to works. It is also stated that surveys to inform the construction methodology for the works in this area may be carried out during the plant growing season/winter wet season to assist with the works being carried out outside of that period. Why have these surveys not been undertaken already? This information is required upfront.	Implementation of mitigation commitments for construction phase, such as the layout of boundary fencing and location of equipment within HDD compounds, will be detailed in the Biodiversity Management Plan which secured by Requirement 9 of the DCO. Mitigation commitments are contained within the Outline Onshore CEMP (REP1-087) as well as Outline Landscape and Biodiversity Strategy (REP1-034). Detailed botanical survey work comprising a National Vegetation Classification survey was undertaken at Denmead Meadows covering the HDD launch pit, with methods described and results shown in ES Appendix 16.4 Non-Statutory Designated Sites Report (APP-412). These data will be supported by pre-construction botanical surveys of areas affected by construction as agreed with Natural England through consultation.
	Section 16.8.4. states that seed harvesting will take place, but it is unknown whether this would be suitable for the specific habitat in question, with certain key indicator species being notably difficult to translocate. The survey work and methods are required in advance.	As seed harvesting will be used to collect seed from lowland meadow habitat within Denmead Meadows lost to the HDD launch pit compound. This seed will be stored and used to restore the footprint of the HDD launch pit compound following the completion of construction. As the seed used for lowland meadow restoration will be sourced from the lowland meadow habitat lost to construction, it will contain those plants originally present. Detailed botanical survey work comprising a National Vegetation Classification survey was undertaken at Denmead Meadows covering the HDD launch pit, with methods described and results shown in ES Appendix 16.4 Non-Statutory Designated Sites Report (APP-412). ES Chapter 16 Onshore Ecology (APP-131) outlines the seed harvesting and restoration methods that will be used to mitigate for lowland meadow habitat loss, with further detail on those methods within Chapter 10 of the ES Addendum (REP1-139).
	In relation to Broadleaved semi-natural Woodland, section 16.3.5.1. Table 16.1 states that no woodland will be felled or damaged to make way for the Proposed Development. Section 16.5.1.19. states that both Crabden's Copse and Crabden's Row are relatively small and encompass 12.2 ha and 12.1 ha respectively. Similar sized patches which represent relicts of more extensive woodland that would have been present historically, are present fairly widely within Hampshire, and contribute to the national ancient woodland resource. Crabden's Copse SINC & Crabden's Row SINC are considered important at the County scale. These fragmented relicts of more extensive woodland can offer opportunity for mitigation/enhancement in terms of connective planting to link the pockets of valuable habitat, potentially to offset some woodland loss.	Landscape planting commitments made within the Outline Landscape and Biodiversity Strategy (REP1-034) provide new hedgerow, woodland, grassland and scrub planting which will link habitats within the vicinity of the converter station. As noted in section 16.3.5.1 of ES Chapter 16 Onshore Ecology (APP-131), no woodland will be felled as part of the Proposed Development and therefore this planting does not offset woodland loss.
	16.5.1.26. other woodland has been scoped out of the assessment ??? Fragmentation and loss of connectivity of woodland around the converter station is a potential issue	Ancient woodland has been scoped into the assessment within ES Chapter 16 Onshore Ecology (APP-131) as an important ecological feature. Other woodland types present within the Study Area comprise broadleaved semi-natural woodland, which has been scoped out of the assessment using the rationale within Table 16.1: "*This habitat type, some of which is listed as HPI, has been avoided through scheme design, HDD and standard measures to be incorporated into the Proposed Development's Outline Onshore CEMP (REP1-087). No woodland will be felled or damaged to make way for the Proposed Development. The use of HDD will avoid stands of woodland along*

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		railway lines and at Kendall's Wharf located within Section 7. Therefore, broadleaved semi-natural woodland has been scoped out of the assessment as there would be no impact."
	Section 16.9.1.2. Residual Effects states that permanent loss of calcareous grassland underneath the footprint of the Converter Station will be mitigated by the improvement of remaining grassland soil horizon and ground protection measures will offset effects to remaining grasslands. How has this been calculated?	Post-submission botanical survey work undertaken at the converter station area has reclassified grassland there as species-poor semi-improved grassland. This revision is reflected in Chapter 10 of the ES Addendum (REP1-139) and has led to grassland at the converter station being scoped out of the assessment as was the case with other species-poor semi-improved grassland within ES Chapter 16 (APP-131).
	Section 16.6.1.1. states that hedgerow removed for the cable route will be re-planted. The hedgerow will need to be removed at a time and under certain methods where it will not impact protected species including nesting birds. Embedded mitigation during construction phase – approved.	Noted.
	Section 16.6.1.11. states that an unknown number of trees will be lost to the development and this will have to be reviewed with the tree officer. These category A trees will need to be assessed for their suitability to support protected species.	Updated Tree Constraints Plans were provided at Deadline 1 at Appendix 10 Tree Survey Schedule and Constraints Plans (REP1-101) which refined the number of trees at risk as a result of the Proposed Development. Tree protection measures will be secured through Arboriculture Method Statements as indicated in the updated Onshore Outline CEMP (REP1-087) and OLBS (REP1-034) provided at Deadline 1. As stated no phase of works shall commence prior to a Construction Environmental Management Plan being submitted and approved by the relevant planning authority.
	Section 16.6.1.19. states that Construction of the Converter Station will lead to the direct, permanent loss of 4.2 ha of semi-improved calcareous grassland, and further habitat will be converted from to other habitats for landscaping in this area. Trenching for the Onshore Cable Corridor, installation of access routes, laydown areas and compounds will lead to further direct, temporary loss and degradation of neutral and calcareous semi-improved grassland. This will lead to loss of vegetation and alterations to the soil structure, likely lowering its botanical diversity. How will this loss be mitigated/offset?	Post-submission botanical survey work undertaken at the converter station area has reclassified grassland there as species-poor semi-improved grassland. This revision is reflected in Chapter 10 of the ES Addendum (REP1-139) and has led to grassland at the converter station being scoped out of the assessment as was the case with other species-poor semi-improved grassland within ES Chapter 16 (APP-131). Landscape planting at the converter station will replace habitats temporarily lost to construction, as detailed in the Outline Landscape and Biodiversity Strategy (REP1-034 Rev002).
	Section 30.2.12.1. States that a negligible adverse effect is predicted for Denmead Meadows and Kings Pond Meadow SINC. As mentioned above, it is unclear how this has been concluded without in-depth survey and analysis of the site.	Detailed botanical survey work comprising a National Vegetation Classification survey was undertaken at Denmead Meadows (including Kings Pond Meadow SINC) covering the HDD launch pit, with methods described and results shown in ES Appendix 16.4 Non-Statutory Designated Sites Report (APP-412). This has informed the assessment within ES Chapter 16 Onshore Ecology (APP-131) and its conclusions.
	Section 5.3.1.1. states that where practicable, any mature trees and hedgerows which are within the site boundary will be retained. Measures are needed to ensure the protection of protected species utilising any trees or hedgerows which are to be removed.	Measures to safeguard protected species during construction, including during removal of hedgerows and trees, are included within the Outline Onshore Construction Environmental Management Plan (REP1-087).

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	Section 6.2.1.11. states that at Kings Pond Meadow SINC and Denmead Meadows, where vegetation has a wet meadow character, work will avoid the plant growing season and winter wet season as both these are important for maintaining the conditions within the habitat. Work in this area will be undertaken in late summer/autumn to facilitate this. How will the wet season be measured/monitored or characterised? Which months will the work take place, and which months will there be no works permitted?	Section 16.8.2.3 of ES Chapter 16 Onshore Ecology (APP-131) defines the months in which construction will take place as August to November, with the remainder of the months of the year avoided. This is further clarified and affirmed in Section 10.2.5.6 (sub-section "Timing of Work") of Chapter 10 of the ES Addendum (REP1-139) which states: "Avoid growing season and winter wet season as both these are important for maintaining the conditions within the habitat; undertake work in late summer/autumn (August to November)."
	Table 7.1. the onshore monitoring plan states that seed harvesting and botanical monitoring will take place subject to landowner permissions. What agreements are in place with the landowner to ensure the suitable long term management (& monitoring) of this land?	Permissions secured through the DCO process will secure land access for post-construction monitoring and maintenance for a period of 5 years. It is not expected that the operational phase of the Proposed Development would have any notable effects on Biodiversity features. Therefore, a 5 year aftercare period for the limited effects in the construction phase is considered appropriate and proportionate.
	Section 1.4.2.12. states that all land temporarily impacted upon through the installation of the cable route would be reinstated with a compatible grass mix. This would not be a suitable approach where you have complex and scarce habitats including certain wet grasslands as there is on Denmead Meadows.	Bespoke mitigation comprising restoration of lowland meadow habitat is proposed for Denmead Meadows within ES Chapter 16 Onshore Ecology (APP-131), with further detail provided in Chapter 10 of the ES Addendum (REP1-139). Additional management and monitoring provisions have been made for HDD compound areas within Denmead Meadows for years 1, 3 and 5 post-construction. These provisions are described in paragraphs 1.5.3.20 to 1.5.3.23 of the Outline Landscape and Biodiversity Strategy (REP1-034) as well as the Onshore Outline CEMP (REP1-087), and secured through Requirement 15 of the dDCO (REP1-021).
	Section 1.4.3.3. states that the construction of the converter station would lead to the direct permanent loss of semi-improved calcareous grassland and the access routes etc. would lead to temporary loss and degradation of neutral and calcareous semi-improved grassland. Where is this loss to be mitigated/offset?	Post-submission botanical survey work undertaken at the converter station area has reclassified grassland there as species-poor semi-improved grassland. This revision is reflected in Chapter 10 of the ES Addendum (REP1-139) and has led to grassland at the converter station being scoped out of the assessment as was the case with other species-poor semi-improved grassland within ES Chapter 16 (APP-131). Landscape planting at the converter station includes provision new semi-improved neutral grassland to replace that temporarily lost to construction, as detailed in the Outline Landscape and Biodiversity Strategy (REP1-034).
	Section 1.4.3.5. states that Denmead Meadows would receive direct impacts through open cut trenching. Mitigation for this would be to maintain soil horizons and preserve grassland turf. Method statements and the reasoning behind the proposed mitigation is required.	Mitigation commitments to offset effects on habitats at Denmead Meadows, including for trenching within Kings Pond Meadow SINC, have been made within ES Chapter 16 Onshore Ecology (APP-131), with further detail provided in Chapter 10 of the ES Addendum (REP1-139). This is secured through the OOCEMP (REP1-087) and the OLBS (REP1-034) as set out in Requirement 15 of the dDCO (REP1-021).
	Section 1.4.3.31. states that an Ecological Clerk of Works is required for delivery of environmental components of the proposals. Details of how the ECoW will be employed, where and when, are required to ascertain the suitability of this approach.	Implementation of mitigation commitments for construction phase, including definition of the role of the Ecological Clerk of Works, will be detailed in the Biodiversity Management Plan which will be prepared and approved pursuant to Requirement 9 of the DCO.

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		Mitigation commitments are made within the Outline Onshore Construction Environmental Management Plan (REP1-087) as well as Outline Landscape and Biodiversity Strategy (REP1-034).
	Section 1.4.3.33. mentions an Ecological Management Plan to be produced setting out mitigation measures on ecological receptors. What is this document and how does it fit in with the CEMP. This should be available now.	Implementation of mitigation commitments for construction phase will be detailed in the Biodiversity Management Plan which will be prepared and approved pursuant to Requirement 9 of the DCO. Mitigation commitments are within the Outline Onshore Code of Construction Practice (APP-505 Rev002) as well as Outline Landscape and Biodiversity Strategy (REP1-034 Rev002).
	Section 1.4.4.3. states that tree groups and hedges at the Lovedean Converter Station site, and the onshore cable corridor are at risk of removal. This is contrary to initial statements in the Environmental Statement where it states in section 16.3.5.1. (Table 16.1) that no woodland will be felled or damaged to make way for the Proposed Development. At this stage we should know where trees/hedges are to be removed.	The Applicant reaffirms that no woodland will be lost as a result of the Proposed Development, and a 15m buffer between the Proposed Scheme and Ancient Woodland will be maintained to protect these habitats. Schedule 11 and Schedule 12 of the dDCO detail trees with Tree Protection Orders and Important Hedgerows that could be subject to removal as a result of works. A review of trees subject to Tree Preservation Orders within the Order limits has been undertaken to identify those which may be affected and confirmation of those which are not. This review has extended to any trees within designated conservation areas and a suitable plan and schedule of trees provided. At Deadline 1 the Applicant submitted: • Updated Tree Constraints Plans (REP1-101); and • Updated Tree Survey Schedule which now also identifies the individual trees, areas of groups woodland and hedges that have been discounted from our impact as a result of updated Order Limits (document reference REP1-101).
	Section 1.4.5. relates to habitat enhancement, and no habitat enhancement measures are proposed on the onshore cable corridor. Denmead Meadows offer a significant opportunity for mitigation and enhancement in the form of management of the whole area to ensure it is under suitable management and this could offset some of the habitat loss felt from the proposals as a whole.	The Biodiversity Position paper (REP1-138) details the position with regard to local and national policy and the actions taken to avoid, minimise and remediate potential impacts on biodiversity. These actions result in bespoke mitigation (at Denmead Meadows) and net gains for all habitats of principle importance (priority habitats).
	Section 1.6.2.1. states that established woodland provides intrinsic ecological value and where practicable and protected during the construction stage and repaired where appropriate. How will woodland be repaired? Ancient and semi natural woodland is judged to be irreplaceable	No woodland will be lost as a result of the development, and a 15m buffer between the Proposed Scheme and Ancient Woodland will be maintained to protect these habitats. The Outline Landscape and Biodiversity Strategy has been updated and a revised version was submitted at Deadline 1 (REP1-034 and 035). Section 1.7.5.1 reads: "[existing woodland] provides intrinsic ecological value. Areas identified for retention must be retained and protected during Construction unless unforeseen technical constraints make this impracticable. Any areas damaged must be repaired." This makes reference to unplanned and unexpected damage to existing woodland, with 'repair' referring to making good of any unintentional or unforeseen impacts in keeping with the long term retention of the woodland and industry best practice.

Table 7.9 – Applicant's Comments on Winchester City Council Local Impact Report – Highways (including works in the Highways)

Para No.	Local Impact Report Statement	Applicant's Response
1.4.16	As might be expected with a linear site, the character changes over distance. The early part consists of a site focused on the highway as it passes through a built up area flanked by development. It then passes into an open section of Hambledon Road where the highway is flanked by hedgerows and trees. Here, it has a distinctly rural character. On the eastern edge of Denmead the cable route turns north through small fields defined by hedgerows. The local community has a strong desire to retain the open gap between the village and Waterlooville to the east. The Hambledon Road is an important communication corridor for the communities of Denmead, Hambledon and those in the south Meon Valley. Essentially, it is the only practical route towards the A3 and M3 corridor which offer links to the Southampton/Portsmouth/Chichester area to the south or northward towards Guilford and London. Local knowledge indicates that this road is used as part of a diversion route when problems occur on the M27/A27. The road is essential for commuters, the movement of freight, for students accessing the schools in the Waterlooville area and generally for local businesses and people shopping. The absence of any easily useable alternative is a critical consideration.	It is unclear what the foundation for the comment "*the local community has a strong desire to retain the open gap between the village and Waterlooville to the east"* is, though it is noted no planning policy is cited in relation to this comment. The Applicant notes there is emerging policy on this matter in the Denmead Neighbourhood Plan but it has not yet been adopted. The Transport Assessment (TA) (APP-448) and the Supplementary Transport Assessment (STA) (REP1-142) have both assessed Hambledon Road in detail, and in agreement with the highway authority Hampshire County Council (HCC). These assessments acknowledge the importance of Hambledon Road, which is why this route formed part of the highway network assessment cordon, using methodologies agreed with HCC, as stated at paragraph 5.4.2 of the STA. The Applicant acknowledges that there will be a level of disruption along Hambledon Road during the construction of the Proposed Development. However, as set out in the Framework Traffic Management Strategy (FTMS) and Framework Construction Traffic Management Plan (FCTMP) (REP1-068 and REP1-070) submitted at Deadline 1, suitable mitigation measures have been set out in order to best manage the flow of traffic and also provide a regime that will allow the contractor to respond to any changes that may arise in circumstances during the delivery of these works. Both the FTMS (REP1-068) and FCTMP (REP1-070) and the measures they propose are secured by suitable requirements of the dDCO (REP1-021).
	In addition to pressing for a more rigorous assessment of the cable laying, the Council is also seeking a commitment through the DCO that the applicant will give an unequivocal commitment to maintaining a free flow of traffic on the Hambledon Road accepting that this may be through the use of a traffic controlled system. In addition, that the dual use path is retained and available for use throughout the work	As detailed in the FTMS (REP1-068) and as assessed in the Transport Assessment (APP-448) and the Supplementary Transport (REP1-142), shuttle working will be used where needed to maintain traffic flow. The provision of these shuttle workings is required in order to ensure a suitable highway safety regime is provided during the delivery of the Proposed Development, both for the travelling public and the workers implementing the scheme. Regarding cycle paths and dual-use paths, the FTMS (REP1-068) details in Section 2.9.3 that where there are shared-use paths or cycleways impacted by the works these will be kept open if possible, or a suitable diversion route provided. Where full closure of cycle route is necessary and diversion routes are unsuitable, temporary cycle facilities of a suitable width will be provided where possible. Where suitable width cannot be achieved, 'Cyclists dismount and use footway' signs will be used as a last resort, noting that this would only be completed for one 100 m section at a time. Where road closures are required for construction of the Onshore Cable Route cycle access will be maintained at all times.
	There is also a concern that traffic may try to get around any roadworks by using the roads through the West Waterlooville Development Area and the applicant is requested to address this in any signage scheme that is put in place.	The FTMS (REP1-068) includes a signage strategy, the full details of which are to be agreed with each Highway Authority prior their implementation. The strategy could include "Access only" signs; the need for which will be determined at the detailed approval stage.

Para No.	Local Impact Report Statement	Applicant's Response
	The Hambledon Road B2510 is the main link into and out of Denmead from the east and the most direct route from Hambledon to the A3. No other practical alternative exists. The degree of disruption in the event that the road is excavated with traffic light controlled flow cannot be underestimated. It is surprising that Aquind do not have full data on projected traffic delays arising from shuttle working that could be extrapolated into how long a vehicle might be delayed.	A full assessment of the impact of the placement of temporary traffic signals on B2150 Hambledon Road has been undertaken, and is include with Table 163 and Table 164 of the Transport Assessment (APP-448), with further sensitivity test analysis on this topic included in Table 35 and Table 36 of the Supplementary Transport Assessment (REP1-142). It can be seen therefore that the Applicant has provided an assessment of the projected delays arising from the traffic management required to deliver the Proposed Development.
	The option of running a single circuit (one group of cables) down each of Mill Road and Martin Road with all the implications that has for residents is not favoured. Some practical alternative has to be found.	Both Mill Road and Martin Road were removed from the Order limits before the submission of the Application.
	Of greater concern is the presentation of the data relating to the level of disruption that will occur (worst case scenarios). The figures presented in Section 3.6 of the Consultation Document are inconsistent in their use of the terminology. In places they refer to all the work within the road but elsewhere they only refer to the installation of one circuit and in other sections carry no clarification. The full installation will involve two circuits. Consequently, the figures given should be doubled. On page 61 it states: The estimated worst case traffic disruption associated with the trenching of each circuit (my emphasis) on this route is approximately: • B2150 Hambledon Road between Soake Road and Milton Road - 66 days shuttle working. • B2150 Hambledon Road between Milton Road and Maurepas Way - 28 days single lane closure • A3 Maurepas Way - 17 days single lane closure • Forest End - 9 days full road closure • A3 London Road between Maurepas Way and Ladybridge Road - 44 days bus lane closure, 28 days shuttle working and 1 day full closure north of Ladybridge roundabout • A3 London Road between Ladybridge roundabout and Portsdown Hill Road - 61 days bus lane closure and 18 days shuttle working • Boundary Way slip road - 4 days shuttle working	Chapter 3 of the Environmental Statement (APP-118) sets out listed duration of impacts per circuit. It was necessary to provide the assessment of highway effects arisng from the delivery Proposed Development to ensure a consistent approach. Notwithstanding this, revised anticipated durations of impacts can be found in the Framework Traffic Management Strategy (FTMS) (REP1-068) for all links listed, with the exception of Forest End. Forest End was not included within the Order limits when the Application was submitted.
	All the above figures should be doubled to show the correct period of time when the roads are subject to some work (worst case). The consequence of a corrected assessment means that a regular traveller driving from the centre of Denmead to Waterlooville (worst case scenario) would encounter a delay at some point on that road over a period of 9.4 months. Not the 4.7months that is implied in the document. It is a concern that members of the public may not have understood the full implications of the duration of the work programme when they have been engaged in the most recent consultation exercise.	Revised durations of impacts can be found in the Framework Traffic Management Strategy (FTMS) (REP1-068). The assessment carried out has at all stages fully considered the duration of the impacts.

Para No.	Local Impact Report Statement	Applicant's Response
	As concerning as the above point is, there is a more fundamental issue that this data has been used in it uncorrected form in the PEIR to arrive at the information in Appendix 21.2 Traffic Delays on Cable Corridors. This analysis sets out the magnitude of the impacts arising from the installation work. Link 4.1 refers to the section of the Hambledon Road and uses the 66 day construction period that appears in the extract from the Consultation Document that is copied above. The impact for this section of road is rated as "Moderate Adverse". If the correct duration was displayed (132 days) the rating may have been greater.	Revised durations of impacts can be found in the Framework Traffic Management Strategy (FTMS) (REP1-068), and these revised anticpated durations have been assessed within Chapter 15 of the Envrionmental Statement Addendum (REP1-139). The assessment carried out has at all stages fully considered the duration of the impacts.
	There are other examples where only half the time period has been used in assessing the significance of the effect on road users. WCC has not reviewed any of the data in Table 21.2 south of the A3 and B2510 roundabout but the question must be asked whether other results are also based on the use of only half the true disruption period. If so, this is a significant flaw in the data which all interested bodies including members of the public have read and used to make up their view on this element of the scheme.	Revised durations of impacts can be found in the Framework Traffic Management Strategy (FTMS) (REP1-068), and these revised anticipated durations have been assessed within Chapter 15 of the Envrionmental Statement Addendum (REP1-139). The assessment carried out has at all stages fully considered the duration of the impacts.
	For some people the traffic implications may have been the most important consideration. This matter is not something which can be casually passed over and corrected at the next stage of the process. Whilst WCC and the other authorities will be in contact with Aquind, for the public the next opportunity to view and comment would be the examination stage. It is questioned if Aquind can reasonably present people with corrected figures at that stage in the process when no options or alternatives are available. Aquind does not know how many people may have viewed the details and not responded based on the incorrect figure. Had the true level of disruption been presented it is possible a higher number of people would have responded.	The traffic and transport implications of the propsals have been fully assessed within the Transport Assessment (APP-448), Supplementary Transport Assessment (REP1-142), Chapter 22 of the Environmental Statement (APP-137) and Chapter 15 of the Environmental Statement Addendum (REP1-139). It is noted this comment relates to the consultation undertaken, rather to the Application when submitted.
	The use of part of the site at Lovedean as one of the two temporary compounds (paragraph 21.4.12.11) to support the cable laying should be clarified in more detail specifically regarding the traffic implications of importing and then exporting the cable drums and the route that would be adopted to reach the northern edge of Denmead. The identification of an alternative temporary compound should be sought.	The Applicant has assessed the implications of construction vehicle movements associated with the cable drum delivery within Section 3.9 of the Supplementary Transport Assessment (STA) (REP1-142), which show that these deliveries can be satisfactorily provided. The indicative Joint Bay locations upon which the cable drum delivery assessment were based upon can be seen in Plate 7 of the STA (REP1-142).

Table 7.10 – Applicant's Comments on Winchester City Council Local Impact Report – Carbon

Para No.	Local Impact Report Statement	Applicant's Response
4.6.17	Issue When calculating the CO2 emissions resulting from the construction stage there appear to be a significant residual amount which is not mitigated in any way. The applicant needs to substantiate the statement that imported power will be low carbon in context of the source of that power.	The energy supplied via the Proposed Development to the UK would be sourced from the French energy network and is considered to be low carbon (see 28.6.2.6. of the in ES Chapter 28 (Carbon and Climate Change) (APP-143). For reference, in 2017 (the most recent data) the UK residual grid carbon intensity was 367 gCO2/kWh whereas the French residual grid carbon intensity was 57 gCO2/kWh. Therefore, on average, the Proposed Development will import lower carbon electricity to the UK network than the average of that domestically generated. Measures have been included in the Onshore Outline Construction Environmental Management Plan (REP1-087) at paragraph 5.15 to reduce carbon associated with construction. It is inevitable that constructing development of the type proposed will generate carbon emissions. It is however the case that by facilitating the importation of low carbon electricity, in addition to reducing the need for the generation of electricity in the UK that is to be supplied by the Interconnector when operational, that the Proposed Development provides a significant benefit in terms of reducing carbon emissions and assisting the achievement of legally binding net zero 2050 climate change targets.
	Aquind have set out the projected carbon emissions for the proposal at both the construction and operational stages. The construction figures are aggregate for the whole scheme but a figure for the Converter Station is available. It is considered that each stage (construction and operational) should be assessed completely separately from each other.	As reported in ES Chapter 28 (Carbon and Climate Change) (APP-143), there is no anticipated net increase in carbon emissions due to the Proposed Development, with the ES concluding that there will be a net reduction. The Applicant also refers to its response to ExA WQ PP1.13.5 (REP1-091) at Deadline 1.
	It is not clear why the emissions of the construction employees travelling to and from the site are not included in the figure. This omission is unusual especially when a figures does appear in the operational stage for those employees engaged in periodic maintenance visits.	Measures have been included in the Onshore Outline Construction Environmental Management Plan (REP1-087) at paragraph 5.15 to reduce carbon associated with construction. It is inevitable that constructing development of the type proposed will generate carbon emissions. It is however the case that by facilitating the importation of low carbon electricity, in addition to reducing the need for the generation of electricity in the UK that is to be supplied by the Interconnector when operational, that the Proposed Development provides a significant benefit in terms of reducing carbon emissions.
	The application does identify certain actions to keep emission as low as possible. However, beyond these actions the applicant is not offering any further measures to mitigate against the residual amount. Measures open to the applicant to mitigate in full for the carbon emissions include planting or contributing to local initiatives to reduce carbon.	With regard to the emissions from construction and the emissions reduction when taking into account the operation of the Proposed Development, the Applicant refers to the response to ExA WQ PP1.13.5 (REP1-091), which confirms the net emissions (emissions increases minus emissions reductions), due to the operation of the scheme over the lifespan of the Proposed Development, a reduction in emissions of approximately -1,529,000 tCO2e (net operational emissions) and that the estimated increase in emissions during the construction of the project is 256,563 tCO2e, therefore the Proposed Development is predicted to have a positive impact on climate over its lifespan. The effects of traffic movements of employees during construction were scoped out of the assessment, as is standard practice, since the emissions produced would not materially affect the results of the assessment in the context of the overall Proposed Development.
	Regarding the operational phase, the question arises if the overwhelming net carbon benefit figure is reliable. It appears to rely on two factors. Firstly continued generation of electricity in France from nuclear power and secondly the ongoing displacement of fossil fuel generation in the UK. The first figure cannot be guaranteed and the percentage of the	The energy supplied to the UK would be sourced from the French energy network and is considered to be low carbon, see 28.6.2.6 of the ES Chapter 28 (Carbon and Climate Change) (APP-143). The Needs and Benefits Report (AAP-115) submitted with the Application and the Addendum to the Report (REP1-136) demonstrates the needs case for the Proposed Development which includes the benefits in terms of carbon reductions. The standard methodology for assessing the Proposed Development (the

Para No.	Local Impact Report Statement	Applicant's Response
	renewable contribution to the UK energy generation sector is likely to increase.	European Network of Transmission System Operators for Electricity method), has been used for this assessment. As with any forecast there is some uncertainty, however the methods used are robust.
	Conclusion The application has considered carbon emissions resulting from the development but excluded those associated with employees travelling to and from the site. A series of actions are proposed to mitigate for the carbon emissions but this still leaves a significant residual amount. To arrive at the conclusion that this residual amount is of no consequence, it is set within the context of UK emissions. This is not considered an appropriate comparator. The residual amount should be mitigated by further specific actions such as offsetting. The Council is ready to engage with the applicant in exploring ways this can be achieved.	As stated above, the carbon emissions associated with employees travelling to and from site has not been excluded, but has been scoped out in line with best practice as it would not materially affect the results of the assessment. Table 28.28 in Chapter 28 of the ES (APP-143) concludes that the residual effects of greenhouse gases will be minor adverse during construction but will reduce during operation to result in moderate beneficial effects. This project on a net basis reduces emissions over its lifespan. This is in line with the Council's commitment to carbon neutrality in the district by 2030. The Applicant considers that offsetting is not required given the mitigation proposed in the Outline Onshore CEMP (REP1-087) and the carbon reduction benefits predicted to be achieved by the Proposed Development.
	Chapter 27 Carbon and Climate Change	
	Notwithstanding the mitigation measures set out in paragraph 27.7 there will still be a net increase in the carbon footprint resulting from the development. It is considered that the applicant should broaden the scope of the mitigation to include more innovative measures relating to works both within the red lined site and off site.	The Applicant refers to the responses above – Over the lifespan of the Proposed Development it is predicted that there will be a net decrease in emissions.

Table 7.11 – Applicant's Comments on Winchester City Council Local Impact Report – Socio-Economics

Para No.	Local Impact Report Statement	Applicant's Response
	The application expresses the view that the proposal will benefit both the local community in terms of accommodation and daily spend by workers and the wider area with job opportunities. The Council is concerned that the first benefit is not substantiated beyond the use of a general formula and the section on actions relating to employment is not secured in any way. Regarding the issue of additional spending in the local economy, the Council questions if this is likely to occur given the low level of accommodation around Denmead and the fact that it seems quite likely that contractors will be encouraged to avoid travel routes that take them through Denmead. The likelihood is that the Portsmouth area given its stock of accommodation, will benefit disproportionately in comparison to the Denmead area. The Council has sought to sign up with developers what are referred to as Employment and Skills Plans (ESP). These are sought on schemes relating to	The calculation of employment and associated benefits has been conservative to reflect the relatively specialist nature of some of the construction work (refer to para 25.4.3.2, Chapter 25 of the ES (APP-140)). Multiplier effects have been calculated at a Regional level (para 25.4.3.7) so will not differentiate between different local authorities crossed by the Proposed Development. Use of accommodation and local spending would not be limited to Denmead and would include other areas within Winchester City Council and the region. Given that predicted construction employment is not assessed as significant, the Applicant does not believe an ESP is required in this instance. The measures set out at Paragraph 25.9.2.1 of the ES also appear in section 5.12.1.1 of the OOCEMP (REP1-087). Flexibility to their application needs to remain as this will depend on whether the nature of the construction work allows these opportunities.

Para No.	Local Impact Report Statement	Applicant's Response
	major developments and above. The Council is following the Construction Industry Training Board client based approach in any plan.	
	Whilst Winchester district may not be considered a high unemployment area, the Council is conscious of the desire to retain existing skills and to broaden the skills base of the district when opportunities arise. Even within schemes such as this one, where there is specialist equipment and highly specialised fitters, there continues to be opportunities for people to be taken on for the duration of the scheme or as construction will span more than one year, apprentices. Some of the work may well be capable of being undertaken by local firms such as the groundworks, building works and landscaping. The important factor is to ensure this is highlighted at the earliest opportunity in any tendering process. If the concept is embedded in the project at the earliest opportunity then contractors will respond more positively to it.	Section 5.12.1.1 of the OOCEMP states that the Contractor will put in place measures to "*upskill people working the Proposed Development, where practicable, through experience, training and development programmes.*" The wording maintains flexibility as explained above, the OOCEMP is secured through Requirement 15 of the draft DCO [REP-021].
	A further element of the ESP that the Council is keen to promote is to highlight future career opportunities for young people in all aspects of the various trades required to complete the project. In normal circumstances this could be accomplished by offering organised visits to the site during the construction phase. The Council is aware that the applicant has expressed some concerns over health and safety of visitors but the Council does not think that with small groups under adequate supervision this concern could not be overcome. If the DCO is granted and should the coronavirus still be present in society when the project is implemented, there are still ways for the applicant to interact with education establishments whereby potential career opportunities can be highlighted to students without actual visits to the site.	This is covered by the measure described above. The Applicant is willing to discuss this further with WCC.
	Having reviewed this issue, the Council considers that the ESP can be achieved through a suitably worded requirement. The Council notes that such a requirement featured in the decision relating to the Cedar Hill Solar Farm (Requirement 16 Local skills, supply chain and employment). Winchester CC stands ready to engage with the applicant and produce a suitably worded requirement.	For the reasons set out above, the Applicant does not consider an ESP is necessary or appropriate. Further, as recognised in Chapter 25 of the ES, the construction of the Proposed Development is relatively specialised with elements of construction requiring specialist contractors. A large proportion of the total potential number of jobs created would be drawn from outside the region. Some aspects of construction can, however, be undertaken by local contractors and provide opportunities for local businesses – with the potential to generate around 90 regional jobs for the duration of the construction period. Considering the specialised workforce and opportunities that can realistically be provided, a requirement of this sort is not considered appropriate. The Cleve Hill Solar Farm example referred to is predicted to create 750 local jobs (including induced labour) per annum over a 24 month period, so much higher job creation than the Proposed Development.
	<u>Conclusion</u> The degree of spending which Denmead will benefit from relating to accommodation and catering is questioned when the it is considered that the village has limited accommodation and that contractors are likely to be discouraged from passing through the village. Although offering to consider	The Applicant refers to the responses above.

Para No.	Local Impact Report Statement	Applicant's Response
	supporting local employment and businesses, the applicant is not offering any actions that are formalised in any way. The Council wishes to see a suitably worded Requirement that would cover this area.	

Table 7.12 – Applicant's Comments on Winchester City Council Local Impact Report – Archaeology and Cultural Heritage

Para No.	Local Impact Report Statement	Applicant's Response
4.5.1	Subject to further discussion on the relevant Requirements there is general agreement on the following topics: • Archaeology (comments of Archaeology Officer attached as appendix I) • Heritage assets(comments of Historic Environment Officer attached as appendix J) • Environmental Protection (comments of the Chartered Environmental Health Practioner are attached as appendix K) • • Assuming the case can be made for the choice of Lovedean, then it is the view of WCC that considering the range of potential locations for the position of the Converter Station relative to the substation, the choice of the western location is on balance as good as it could be in terms of minimising the impact.	General agreement on Archaeology and Heritage topics is noted. Responses to queries within Appendix I and J are provided in the relevant section below. Further information regarding the consideration of alternatives undertaken by the Applicant is detailed in the Supplementary Alternatives Chapter - Appendix 3 of the ES Addendum (REP1-152), which includes further information in relation to the alternatives grid connection points studied, the balancing of relevant considerations undertaken by the Applicant and the reasons for the selection of Lovedean Substation. It is noted that WCC agree the choice of location in proximity to Lovedean is the best selection for minimising impacts.
Appendix I	Key Issues requiring clarification: Human remains Part 7 sections 48.(1) to 48.(18) of the draft Development Consent Order (Document ref. 3.1) covers procedures for dealing with human remains with the Order Limits. However these seem largely directed at more recent burials, rather than burials / human remains of archaeological interest. Human remains of archaeological interest are anticipated in Section 1 of the Order Limits, as identified in section 1.4.2 of the DBA (document ref. 6.3.21.2). Section 48.(16) states that "Section 25 of the Burial Act 1857(a) (bodies not to be removed from burial grounds, save under faculty, without licence of the Secretary of State) shall not apply to a removal carried out in accordance with this article". However this is the normal procedure for the archaeological excavation of human remains. Appropriate provisions should be made for the archaeological investigation, recording, analysis and publication of burials / human remains of archaeological interest within the Development Consent Order. The Development Consent Order should align with the mitigation measures and procedures set out in ES Vol. 1 Chapter 21, Para. 21.2.2.3 (document ref. 6.1.21) and Section 1.4.2 of the DBA (document ref. 6.3.21.2)	Please refer to the response to ExA WQ DCO1.5.56 (REP1-091) which provides further clarifications in relation Article 48. Article 48 is an authorising power which removes the requirement for the procedure required by Section 25 of the Burial Act 1857 to be followed to ensure the Proposed Development can be delivered without the need to do so, noting that adequate controls are otherwise provided for by the remainder of Article 48. This a standard approach to the inclusion of this Article in DCOs, The Articles of the DCO are authorising powers. The works which may be carried out pursuant to those authorising powers are subject to the various controls provided by the Requirements and other relevant provisions of the DCO. It is not necessary ad or appropriate to amend Articles to refer to documents as is suggested. The relevant measures in relation to archaeology are provided by Requirement 14. The geophysical survey carried out in support of ES Chapter 21 (Heritage and Archaeology) (APP-136) showed limited potential for extensive archaeological remains within the area of the proposed Converter Station, which would warrant preservation in situ. As such it is considered highly unlikely that such remains are present.

Para No.	Local Impact Report Statement	Applicant's Response
3.9 Mitigation		
	1. Para. 2. (1) (c) of Part 1 of the draft Development Consent Order (document ref. 3.1) confirms that "onshore site preparation works" meaning includes pre-construction archaeological investigations. Access to the land to undertake archaeological investigations within the Order Limits is secured by Part 4, 19.(1) (c) of the draft DCO. 2. SCHEDULE 2 Part 14.(1) of the draft DCO deals with Archaeological Requirements. Note, given the identified element of uncertainty regarding below ground heritage assets within the Order Limits (e.g. ES Vol.1 Chapter 21, para. 21.4.3.1 & 21.8.1.3, document ref. 6.1.21), all parts of Route Sections 1 and 2 that lie within the Winchester city council boundary should be considered to comprise "areas of archaeological interest" as set out herein. 3. Following the PEIR submission, a broad archaeological mitigation strategy was agreed with the applicant's archaeological consultant (ES Vol. 1Chapter 21, Section 21.3.4,document ref. 6.1.21). This broad strategy will be an iterative process, comprising an initial stage of evaluation trenching, to be followed by archaeological excavation ahead of construction / other enabling works or archaeological watching brief during construction, as required. Although the nature of which post evaluation mitigation measure might be required in particular areas within the Order Limits cannot as yet be identified, ES Vol.1 Chapter 21, para. 21.4.2.19 (document ref. 6.1.21) provides an indication of the circumstances in which different mitigation measures might be applied. At the post-PEIR stage, it was advised that the ES should contain a detailed, robust and flexible archaeological mitigation strategy, appropriately resourced and timetabled in relation to the overall construction programme, following the granting of any DCO. Although a detailed archaeological mitigation strategy (including elements such as post-fieldwork assessment, analysis, publication / dissemination and public outreach etc.), has not been undertaken (although some elements are briefly mentioned, e.g. in para. 21.8.1.7, ES Vol. 1 Chapter 21, document ref. 6.1.21), the agreed broad mitigation strategy has been further developed, based on anticipated survival, for example, whether a greenfield or a brownfield area and likely impacts, and is detailed in the following documents: • Doc. Ref. 5.4 Planning Statement (Para. 5.3.9.9); • Doc. Ref. 6.6 Mitigation Schedule (Chapter 21, MS ref. 21.3-9); • Doc. Ref. 6.9 Onshore Outline CEMP (Section 5.8);	1. Requirement 14 confirms that it applies in respect of the onshore site preparation works. The inclusion of pre-construction archaeological investigations ensures it is not necessary for all other pre-commencement requirements to be discharged before those works may commence, but they are subject to Requirement 14. 2. The geophysical survey carried out in support of ES Chapter 21 (Heritage and Archaeology) (APP-136) showed limited potential for extensive archaeological remains within the area of the proposed Converter Station, which would warrant preservation in situ. As such it is considered highly unlikely that such remains are present. 3. As acknowledged in the Local Impact Report, ES Chapter 21 (Heritage and Archaeology) (APP-136) and supporting appendices (Doc. Ref. 6.6 Mitigation Schedule (Chapter 21, MS ref. 21.3-9; Doc. Ref. 6.9 Onshore Outline CEMP (Section 5.8) provide a comprehensive iterative strategy for evaluation and where appropriate mitigation. The Onshore Outline CEMP (REP1-087) is secured by Requirement 15 of the dDCO (REP1-021). 4. It was agreed with the Winchester City Archaeologist during the ES Assessment stage (paragraph 21.3.4.1 of ES Chapter 21, (APP-136)) that a programme of archaeological strip, map and sample may be suitable and that any further intrusive archaeological investigation could be carried out post DCO consent. As stated in the Onshore Outline CEMP (REP1-088) paragraph 5.8.1.8, there is a very small chance that archaeological remains of very high (national) significance will be encountered. In the highly unlikely event that remains are uncovered which require preservation in situ, design changes could be considered but only where this is 'feasible or warranted'. With a scheme already consented at this stage, this could only be undertaken where this is feasible within the consented design. For example it may be possible to modify proposed formation levels or other means of avoidance. If it is not feasible and practicable in the design however, due to engineering or other reasons, preservation by record (e.g. targeted excavation and recording) would be necessary. In respect of whether preservation in situ is warranted, this would depend on the significance of the heritage assets affected, as revealed by the preliminary evaluation carried out post Consent. This approach is secured as part of Requirement 14 of the dDCO (APP-019).

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	• Doc. Ref. 6.1.21 - ES Vol.1 Chapter 21 (Section 21.8 & Table 21.6). 4. There are some concerns over the vagueness and looseness of some the language used in detailing the mitigation proposals within the various documents of the ES (for ease of reading references are largely limited to Chapter 21 of the ES, document ref. 6.1.21). For example, in ES Vol 1 Chapter 21, para. 21.8.1.1 (document ref. 6.1.21), refers to mitigation … "where feasible and warranted" (my emphasis). A further example is in para. 5.3.9.9 of the Planning Statement, where it is indicates that "Mitigation of these construction Impacts…. is proposed to include (my emphasis). It is also unclear as to what scope there would be to implement a preservation in situ strategy which "may be a requirement, where feasible…" (ES Vol.1 Chapter 21 21.8.1.6 Strategy 1, document ref. 6.1.21). Palaeoenvironmental sampling (ES Vol.1 Chapter 21 para. 21.8.1.16, document ref. 6.1.21) may be required elsewhere along the Order Route, for example in areas where colluvium is present	
Securing Mechanisms		
	ES document ref. 6.6 - Mitigation Schedule summaries the proposed archaeological mitigation strategy and sets out the Control Document/ Licence and Securing Mechanism for this; namely the Onshore Outline CEMP (document ref. 6.9) and the draft DCO (document ref. 3.1). With regard to the latter, attention is drawn to previous comments relating to human remains.	The Applicant refers to the response above.
	Within the Mitigation Schedule, it is questioned whether the securing mechanism for MS ref. 21.3 to 21.7 (inclusive) should refer to Draft DCO, Schedule 2, Requirement 14 (Archaeology) as for MS ref. 21.8 to 21.9 and not Requirement 15 (Onshore Outline CEMP)?	The Applicant will discuss requirement 14 with WCC to confirm they are happy with its form, as this comment raises questions in that regard.
	The provisions set out in the draft DCO Schedule 2, Requirement 14 do not fully accord with the proposed archaeological mitigation strategy detailed in the documents referenced above. In particular 14._(3) and (5) do not refer to the initial stage of archaeological evaluation (trial trenching) or possible preservation in situ, proposed in the mitigation strategy.	The requirement is not intended to reflect the wording in the control document, it is to secure that the measures in the control document are undertaken. The Applicant will discuss requirement 14 with WCC to confirm they are happy it's from.
Other Errors and Omissions:		
	Document ref. 6.6 Onshore Outline CEMP Section 5.8 Heritage and Archaeology.	Paragraph 5.8.1.3 omissions have been amended in Updated Outline Onshore CEMP submitted at Deadline 1 (REP1-087).

Para No.	Local Impact Report Statement	Applicant's Response
	• Para. 5.8.1.3 omits relevant text outlining the three proposed strategies compared to Section 21.8.1.1 of ES Vol. 1 Chapter 21).	
	Para. 5.8.1.4 further diverges from the text of ES Vol. 1 Chapter 21 para, 21.6.2.3 & 21.8.1.2 – the former identifying a working width of up to 19m, the latter, up to 23m.	With regard to the cable route working width, the assessment has been based on the approximate 23m width, as specified in ES Chapter 21 (APP-136). The error in paragraph 5.8.1.1 of the Updated Outline Onshore CEMP will be corrected.
	Document ref. 6..21 ES Vol 1 Chapter 21 Heritage and Archaeology: • Para. 21.2.3.6 – WCC Local Plan Policy – the old 2006 Local Plan is noted here, not the adopted Local Plan Part 2;	The date of the Local Plan Policy should read 2017 and is a typographical error, which does not change the conclusions of the assessment presented in ES Chapter 21 (Heritage and Archaeology) (APP-136).
	Section 21.4.1.1 – Although the archaeological monitoring of geotechnical test pits is considered in the ES, the report on this monitoring has not been included as previously agreed;	The results of the monitoring of Geotechnical test pits have been incorporated into the Geology section 4.2 of Appendix 21.3, Historic Environment Desk Based Assessment (APP-442). A plan showing the location of the investigations is included in Figure 5 of that report, which was submitted at Deadline 1 (Appendix 17, ref 7.8.1.17). The report itself provides no further information in support of the Application and the limited results found during the investigation. As such this report was not included in the suite of documents submitted as part of the DCO application. If required, the report will be provided to the Local Planning Authority for submission to the Winchester Historic Environment Record.
	Document ref. 6.3.21.2 ES Vol. 3 Appendix 21.2 Historic Environment Desk Based Assessment: • Formatting errors means that paragraph numbers are not easy to equate with the text; hence on occasion only section numbers are referenced;	Minor formatting errors noted. Corrected version submitted at Deadline 2.
	Figure 1-18 are missing;	Figures 1-18 were submitted at Deadline 1 (7.8.1.17 - Environmental Statement Addendum - Appendix 17 – Historic Environment Desk Based Assessment Figures and Appendices - Rev 001)
	Appendix 1 – Historic Environment Gazetteer is missing;	Historic Environment Gazetteer has been submitted at Deadline 1 (7.8.1.17 - Environmental Statement Addendum - Appendix 17 – Historic Environment Desk Based Assessment Figures and Appendices - Rev 001)
Requirements		
	The addition of further detail and strengthening of the proposed archaeological mitigation strategy, including for human remains, the submission of an appropriate WSI and its implementation in full would need to be adequately controlled and secured.	Each stage of archaeological work will be directed by a Written Scheme of Investigation (WSI) outlining the scope and methodology for site-based investigations will be submitted and approved by the relevant planning authority prior to undertaking the work, in accordance with Requirement 14 Archaeology, of the draft DCO. The Applicant will discuss requirement 14 with WCC to confirm they are happy it's from.

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Appendix J: Historic Environment		
	There are a number of references within the submitted information which presume or imply that a number of buildings of different size scattered across the site would be more harmful than the current proposal (that is, one large / conjoined structure) by virtue of creating visual clutter. This is contested as it has not been demonstrated or evidenced that this would be the case. These statements imply that the use of a number of smaller buildings would be practical from an operational perspective. No details of the potential opportunities to reduce the height, and thereby the impact of the building, that this alternative approach may offer have been included in the submission. Given the potential this alternative approach may offer to significantly reduce the impact on landscape (on which I defer to my landscape colleagues) and on the setting of the listed buildings closest to the site, all opportunities to mitigate harm as far as possible should be investigated and evidenced. This evidence and justification is currently lacking and as such brings into question the need for a building of the size and height proposed.	The basis of these comments is not understood. It has been confirmed that the size of the Converter Station buildings cannot be reduced. They are the size they are because of their operational requirements. For further information regarding the design of the Converter Station please see the Design and Access Statement (REP1-031) and the First Written Question Responses – Appendix 1 Converter Station Design Approach (REP1-092).
	It is unclear why there is a need for the large volumes of open space above the equipment as depicted in the submitted cross sections. It is assumed that there are sound operational requirements for this space but this is not explained in the submission and therefore raises the questions as to whether there is scope to significantly reduce the height and scale of the buildings.	The Applicant refers to the updated Design and Access Statement (REP1-031) which has been issued as a part of Deadline 1 submission which details the requirements for converter buildings and the equipment that is to be located within them. The Applicant confirms that all clearance distances are driven by operational requirements. The Applicant has no desire to build the building any taller than it needs to be and this is reflected in the design approach taken.
	Paragraph 3.2.1 discusses which alternative sites have been considered and discounted and justifies these. However, nowhere in the submission is there any discussion of alternative layouts which could potentially reduce the impact of the building by reducing its height. Much emphasis is made of operational constraints dictating built form but it is not explained what these constraints are. This lack of explanation and justification means that it has not been satisfactorily demonstrated that an alternative solution with a shorter building or buildings, which could have significantly less impact on the setting of heritage assets, could not be achieved.	The Applicant refers to the updated Design and Access Statement (REP1-031) issued as part of the Deadline 1 submission, which details the requirements for converter buildings. This provides further justification for the height and layout of the buildings. It is not possible to reduce the height of the buildings further whilst meeting the operational requirements for the Converter Station buildings. Further information regarding the design of the Converter Station is contained at First Written Question Responses – Appendix 1 Converter Station Design Approach (REP1-092).
	Paragraph 15.5.3.76 states that the Hambledon Conservation Area has not been included in the LVIA as it is considered that it would not experience potential views of the development. This statement needs to be justified and evidenced given the proximity of the Hambledon Conservation Area to the site and well within the ZTV. The impact on the setting of Catherington Conservation Area is assessed in ES Vol.1. Ch. 21 (Heritage and Archaeology) but the impact on Hambledon is not assessed. As above,	The rationale for exclusion of Hambledon Conservation Area is outlined in Table 4 of Appendix 21.2 of the ES (Historic Environment Desk Based Assessment, (APP-442)). The boundary of the Hambledon Conservation Area is located approximately 2.8km to the north-west of the Proposed Converter Station. The conservation area is located outside of the 2km radial study area and the ZTV showed limited views from the outer edge of the CA in views out towards the Site and was therefore scoped out. The Hambledon Conservation Area Appraisal (2009) was considered during the ES assessment which outlines important views in the conservation area in the Townscape Appraisal Map. These

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	justification as to why the impact on Hambledon has not been considered is lacking.	views highlight the importance of views within the CA, i.e. between listed buildings, across the village's streetscape and in some rural views to the south. None of these views which contribute to the areas significance are to the south-west towards the location of the Proposed Converter Station and therefore supported scoping out the conservation area from the ES assessment.
	Minor error; Paragraph 5.3.9.11 states that the Catherington Conservation Area lies to the west of the convertorconverter station site; Catherington lies to the east and Hambledon to the west.	This is a typographical error which does not change the conclusions of the assessment presented in ES Chapter 21 (Heritage and Archaeology) (APP-136).
	Design/further details required; The submitted elevations are all indicative and heavily caveated as such. There is therefore a need to control the final appearance of the converter station and its materials by condition. Similarly there are no details of the potential vehicular access, one of which would be in close proximity to the grade II listed barn at Shafter's Farm, and these would also need to be adequately controlled.	Requirement 6 of the dDCO (REP1-021) require the approval of the detailed designs of the Converter Station which must accord with the design principles and the parameters and be approved by the relevant planning authority in consultation with the South Downs National Park Authority before any works can commence. ES Chapter 21 (Heritage and Archaeology) (APP-136) provides a comprehensive and robust programme of mitigation has been which will offset or reduce any adverse environmental effects to negligible, which would include areas of proposed vehicular access roads within the Order limits. Potential accidental strike damage to nearby designated heritage assets outside of the Order limits are addressed in the Outline Onshore Construction Environmental Management Plan (OOCEMP), paragraph 5.8.1.2 (REP1-087), which states when undertaking construction works the contractor should take into account nearby Designated Heritage Assets, such as listed buildings, including curtilage structures (i.e. associated assets with the property extent such as boundary walls, which may not be mentioned specifically in the listing description).

Table 7.13 – Applicant's Comments on Winchester City Council Local Impact Report – Funding and French Consents

Para No.	Local Impact Report Statement	Applicant's Response
4.6.1	Re-affirmation of Funding Statement The requirement for the applicant to provide a certain level of financial information is noted (APP-023). This gives an outline of how the capital for the project will be raised. The need for this information is assumed to be for the applicant to either show they have sufficient resources themselves to undertake the project, or a reasonably robust plan to raise the capital. Following the recent turmoil on the financial markets, the question arises if the original plan to raise the capital remains sound? Accordingly, the applicant is invited to update the financial statement on this aspect of the scheme.	The Applicant refers to the Applicant's response to ExA WQ 1 CA1.3.1; CA1.3.95; CA1.3.96 (REP1-091) provided at Deadline 1.
4.2.1	The Council is conscious that the UK side is only half of the overall project and for it to function requires the approval and construction of the other half on the French side. The progress in getting that part of the scheme approved and in a position to be implemented is unclear at the present time. When	The position with regard to progress in respect of, and the anticipated timescales to obtain, the required consents to permit the elements of the Project located in France is explained in the Other Consents and Licences Document (REP1-029).

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	considering the bilateral nature of this project, it seem sensible to ensure that the French half of the scheme has approval and is ready to be implemented before work starts on any part of the scheme on the UK side. This avoids the potential situation of work commencing here, without the other half of the project getting consent. This concerns applies to both the cable installation and the construction of the buildings. At worst, any cable installation would result in the identified impacts being experienced by the local communities. Relating to the Converter Station, this might result in the Council being faced with a proposal to seek some alternative use for a building that would owe its presence to a totally different set of circumstances and have only gained approval based on a unique nationally proven need.	The Applicant notes the request to restrict any implementation until the building and environmental permits required in France for the French elements of the Project are obtained. The Applicant does not consider this to be necessary and that taking such an approach could have unforeseen consequences. It would be unusual to reference foreign consents and legislation in such a way, and how one would evidence the position in the UK in respect of consents from another jurisdiction satisfactorily is not clear. In any event it is confirmed that the Applicant would not be in a position to proceed with either side of the Project until the building and environmental permits in both countries are secured, as it would be financially imprudent to do so and it is expected that this would not be an approach acceptable to any investor.

Table 7.14 – Applicant's Comments on Winchester City Council Local Impact Report – Ground Levels

Para No.	Local Impact Report Statement	Applicant's Response
	The Council is aware of the ground water sensitivities and that the applicant has been in conversation with Portsmouth Water and the Environment Agency. However, to date the application does not contain the paper trail that shows that the 85.1AOD level is the lowest that can be achieved for the above reason, or any other technical consideration.	The Applicant refers to Appendix 3 - Proposed Site Level and Earthworks Methodology (REP1-094) submitted in response to ExA WQ 1 MG1.1.6 (REP1-091) provided at Deadline 1 which contains further information in this regard.
	It is acknowledged that there would be additional technical considerations to digging deeper into the surrounding ground, including the stability of the banks, the ability to dispose of surface water and the possible need to dispose of surplus spoil. However, to date no reason other than the apparent one to achieve a "balance" of excavated against fill material requirements appears to have been considered.	The Applicant refers to Appendix 3 - Proposed Site Level and Earthworks Methodology (REP1-094) submitted in response to ExA WQ 1 MG1.1.6 (REP1-091) provided at Deadline 1 which provides further information in relation to the technical constraints present in the Converter Station Area and he reasons for the approach to be taken to establishing the site level.
	The proposal as submitted does contain conflicting information on the point from which the height of the building will be calculated. The Interpretations to the Requirements Schedule 2 1 (6) (b) says the height of the building will be taken from existing ground level. The building parameter plan (doc 2.6) options contains the following note: HEIGHTS INDICATED ARE HEIGHTS ABOVE FINISHED GROUND FLOOR SLAB LEVEL (+85.100 AOD) IN COMPLIANCE WITH FLOOD RISK ASSESSMENT REQUIREMENT (+300mm ABOVE FINISHED (IE TOP OF GRAVEL CHIPPING) CONVERTER STATION SITE LEVEL (+84.800 AOD)).	The building parameter plan reflects the correct information in relation to the building height and how it is measured. Schedule 2 1(6)(b) of the dDCO (REP1-021) has been updated to remove reference to existing, acknowledging that this may cause confusion, despite referring to the height being measured from the ground level existing at the time at which it is measured. Revised Converter Station and Telecommunications Buildings Parameter Plans (REP1-017) were submitted at Deadline 1. These confirm that buildings within parameter zone 4, where the Converter Station Buildings are to be located, may not exceed +111.10m AOD, and in turn that maximum height assessed cannot be exceeded. This provides a level of flexibility in relation to the site level and the roof profile to reach a solution which is within the assessed parameter envelope.
	Since April 2019 WCC has been seeking clarification why the 81.5m AOD figure was adopted. In response, Aquind have indicated that this was fixed in recognition of the need to protect the Aquifer. WCC has asked for sight of the background discussions with the Environment Agency and Portsmouth Water	The Applicant understand that this is a typographical error and WCC refers to 85.1m AOD. The Applicant has explained to WCC on several occasions that the reasons for this are so that any potential for adverse impacts on the principal chalk aquifer are avoided. Despite this, it is noted WCC is not yet satisfied of the position. The Applicant refers to Appendix 3 - Proposed Site Level

	that support this approach. To date they have not been forthcoming. It is hoped that this evidence will be presented during the examination. The lack of the evidence base for the 81.5m AOD figure raises a question whether the excavation could in fact go deeper, setting the building into the ground to a greater degree. At the present time this matter remains unresolved between the two parties.	and Earthworks Methodology (REP1-094) submitted in response to ExA WQ 1 MG1.1.6 (REP1-091) provided at Deadline 1 which provides further information in this regard, and which it is hoped will satisfy WCC on this issue.

Table 7.15 – Applicant's Comments on Winchester City Council Local Impact Report – Land Acquisition

Para No.	Local Impact Report Statement	Applicant's Response
	In the ongoing discussions with Aquind, the approach of acquiring an easement to acquire rights and impose restrictions has been challenged on the grounds it lacks adequate control and security of the features in the long terms. Only those features that lie within the permanently acquired land can be subject of a suitably worded Requirement. At the present time, there does not appear to be any proposal for a link through the dDCO into the deed of covenant and to the landowner that would require specific actions.	The responses provided above confirm the position with regard to permanent acquisition and the acquisition of rights and restrictions by permanent easement. This approach reflects the Applicant taking a proportionate to the potential compulsory acquisition of land, which it must do so in accordance with the relevant guidance related to compulsory acquisition. Property easements are a long-standing manner in which rights and restrictions over land are secured. They provide legally enforceable property rights over land. The securing of rights and imposition of restrictions by way of an easement is wholly adequate to ensure the Applicant has the necessary control and as such the existing landscape features are able to be retained and maintained in accordance with the management prescriptions provided for in the Outline Landscape and Biodiversity Strategy (REP1-034).
	Why a distinction is to been drawn between those features on land that will be acquired and those on land that will not be acquired is unclear. All these features serve the same function to screen the proposed Converter Station. The Council has sought a copy of a model agreement of the type that would be signed between the applicant and the landowners. Without sight of the agreement there is a concern that any enforcement may not be possible. A failure to comply with a requirement is enforceable through Section 161 of the PA2008. This section also contains the associated penalty for any breach. If the controlling agreement is one step removed from the DCO then control has been lost.	The response above confirms the position, with permanent acquisition sought in relation to land where this is in closer proximity to the Converter Station and exclusive possession is necessary and easements sought in relation to existing landscape features which are a further distance away from the Converter Station, and which it would not have been proportionate to seek the freehold compulsory acquisition of. It is well established that easements over land are enforceable property rights. The rights to be required and restrictions to be imposed are very clear detailed in the Book of Reference (REP1-027) which WCC may wish to consider.
	In discussions with the applicant no model agreement has been presented. It is also unclear if the agreements will contain any "penalty" in the event of a breach. Without some form of penalty, the enforceability of the agreement seems weak.	It is not intended that the easements will include any penalty provisions, as would be highly unusual for any sort of property easement. It is well established that easements are legally enforceable property rights and any breach of the easement would be a legal matter where remedies could be appropriately sought through civil action.
	The applicant is invited to identify another DCO where a deed of covenant has been used this way to control features to screen a site. It is not clear what course of action the applicant will follow if an approach to complete a deed of covenant is rejected. Will CPO powers then be exercised? If so, to what will they be applied?	Whilst not a made DCO as it is currently yet to be determined, the Applicant notes that the same approach to acquiring the necessary rights and impose restrictions in relation to Landscaping is taken in the Hornsea Project Three Offshore Wind Farm DCO. It is confirmed that if a voluntary deed of covenant to impose an easement is not able to agreed, the Applicant will exercise powers to compulsorily acquire the necessary rights and restrictions. It is for this reason that these rights over the

Para No.	Local Impact Report Statement	Applicant's Response
		relevant land are included for within the Book of Reference (REP1-027) which WCC may wish to consider.
	It is not clear from sheet 1 of 10 (APP-008) if sufficient space has been allowed or should be shown within the red lined DCO limits to allow access to these features on the field side of the roadside hedgerows or the allow access across fields to those features that lie between fields. Without suitable access to carry out management duties then any agreement is not capable of being implemented.	The Applicant confirms that the Land Plans do not include the necessary areas for access to the landscaped areas where this is not already from the public highway. It is not necessary for the Applicant to also seek to acquire rights of access over the public highway.
	Without sufficient control over the screen features, their value in terms of their contribution to the screening of the site must fall under question. There are remedies to this matter through the provision of additional information or the use of other mechanisms to secure sufficient control over the necessary land to achieve the new planting and retention of existing features as well as their combined long term management. It is recognised that this action may have implications on other parts of the examination process. The Council raised this matter in its representation (PDB-006) and at the re-convened Preliminary Meeting. The Examining Authority acknowledged this issue and agreed that it could be consider at the Compulsory Acquisition Hearing	The Applicant is content that the securing of the necessary rights is provided for to allow for the future retention and maintenance of landscaping which provides a screening benefit in connection with the Proposed Development, and that the relevant controls are provided for by the DCO ensure the retention and management of those features. Should WCC still consider it is necessary for further information to be provided, the Applicant is willing to discuss this further.
	One further dimension is the concern that without sight of a model deed of covenant there is no way of knowing if the document is secure should the applicant seek to pass on the benefits of the consent to another party under Part 2 article 7 of the dDCO. Whilst the general requirements associated with a DCO are transferred, if the deed is completed outside the framework of the DCO then it may not be transferable. Confirmation that this is not an issue is requested.	It is a long established principle that covenants relating to property by way of an easement run with the land and it will therefore be the case that where the Converter Station is transferred to another entity it will be transferred with those rights. No person would seek the benefit of the operation without this, as they would then not be in a position to comply with the Requirements of the DCO and would be subject to enforcement actions. Should the Secretary of State require any confirmations in relation to such matters in the event any such transfer is proposed, the Applicant will be happy to provide this at the time.
	Whether the deed of covenant is judge to be an appropriate mechanism to be used to secure control over landscape features or not, there is a concern that the proposal is only seeking to secure landscape features for only 5 years (Article 32 (12) of the dDCO) (APP-019). This is considered far too short a timeframe. It should be noted that part of the submission includes photomontages of the buildings after 20 years. It therefore appears that the applicant will be relying on screen features over which they have no control. If the building has an indefinite life, then the Council considers that this is the benchmark for the control and retention of the identified landscape screening features.	The Applicant refers to the Applicant's Response to Ex A WQ 1 LV1.9.37 (REP1-091) which refers to replacement planting during the operational lifetime of the Converter station, as provided for in the updated Outline Landscape and Biodiversity Strategy (REP1-034) and revised dDCO (REP1-021) submitted at Deadline 1
	<u>Conclusion</u> There are concerns that the screen features that the landscape assessment is relying upon to soften or mitigate against the presence of the Converter Station cannot be relied upon to be retained. This concern also applies to the delivery and long term retention of the new planting that is also proposed to contribute to the screening. Without the confidence in the mechanism to achieve these objectives there is a real and significant risk that the conclusions of the landscape assessment cannot be delivered. This will result in the building being opened up to	The Applicant refers to paragraph 4.3.11 in the SoCG with WCC (REP1-118) which states that a deed of covenant is being sought with the appropriate landowners for the long-term maintenance and management of existing planting and retained hedgerows, and powers of compulsory purchase acquisition are sought to acquire the rights and impose restrictions to do so in the event a voluntary agreement is not reached with those persons. The approach being taken is very clearly set out in the Statement of Reasons (REP1-025) and the Book of Reference (REP1-027) which

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	more extensive views in the surrounding landscape. Such a degree of exposure would be unacceptable to the Council.	WCC may wish to consider. The Applicant has also addressed these matters in further detail above. The Applicant confirms that they will be responsible for the long term management during the operational life of the Converter Station and this is reflected in the Applicant's Response to ExA WQ 1 LV1.9.37 (REP1-091), the updated Outline Landscape and Biodiversity Strategy (REP1-034) and the revised dDCO (REP1-021) submitted at Deadline 1.
	Accordingly, without additional detail to provide the confidence in the use of the deed of covenant, or by the adoption of another mechanism to deliver the requirements, then the proposal is considered to be in conflict with the intentions of the local plan polices set out above. The time period that any management agreement covers must be included and that should be in perpetuity.	The Applicant has responded above to confirm how the necessary rights and restrictions required will be acquired on a permanent basis to ensure that the retention and management of landscape features is able to carried out in accordance with the relevant controls provided for through the DCO Requirements and in accordance with the supporting control documents, being the Outline Landscape and Biodiversity Strategy (REP1-034)

Table 7.16 – Applicant's Comments on Winchester City Council Local Impact Report – Comments on the Draft DCO

Para No.	Local Impact Report Statement	Applicant's Response
9. Defence to proceedings in respect of statutory nuisance		
	Both the statutory nuisance assessment and the environmental statement consider that the development will not result in a statutory nuisance. I fail to understand why it is appropriate to include additional defences to that already provided by Section 80(7) – Best Practical Means. I therefore see no need to introduce a new test of "cannot reasonably be avoided" I therefore suggest that section 9 is deleted if it is considered this increases the statutory nuisance threshold.	The Applicant refers to its response to ExA WQ MG1.1.9 and a N1.11.1 at Deadline 1 (REP1-091). The Applicant does not agree to the deletion of Article 9. It is necessary to ensure there is no unreasonable impediment to the delivery of the Proposed Development. The noise levels to be achieved in relation to the operation of the Converter Station are very clearly secured by Requirement 20 of the dDCO (REP1-021) and this ensures adequate protections are included for.
	If this section is to remain then it references paragraph (g) and (ga) of section 79(1) and then in brackets states (noise emitted from premises so as to be prejudicial to health or a nuisance). It should be noted that this relates to section (g) only as section g(a) relates to "noise that is prejudicial to health or a nuisance and is emitted or caused by a vehicle, machinery or equipment on a street". Section (g) will therefore mainly relate to noise relating to the installation and operation of the Converter station and section g(a) to the installing of the cabling (development stage).	Noted. The Applicant will correct this in the dDCO to be submitted at Deadline 3.
	As the construction phase is temporary and section g(a) will relate mainly to such activity, I would find a rewording of section 9 to refer purely to section g(a) less of an issue due to its temporary nature.	Please refer to the above responses. Article 9 will not be amended as requested.

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SCHEDULE 2 – Requirements 15. Construction environmental management plan (CEMP)		
	I welcome inclusion of this requirement but as this requires each detail phase CEMP to be substantially in accordance with the outline CEMP I request that the following change is made to the draft CEMP (Document 6.9 – Onshore Outline Construction Environmental Management Plan):	Cable Section 1 is the Converter Station area and the assessment has been undertaken on this basis. The calculated risk of dust impacts therefore already takes into account all of the activities involved in the construction of the converter station.
	Table 5.3 – This is titled "table of dust results per onshore cable corridor section". There is however no comparable assessment for construction activities of the converter station itself. There needs to be a comparable table/entry for the Converter station construction which should categorise this activity as high risk (in accordance with paragraph 23.6.2.7 of the Air Quality Chapter 23 (Document 6.1.23)	
	18 Construction Hours	
	Again this is welcome. However exemption 4(b) should be amended to remove the exemption for receipt of oversize deliveries to the site. Such activity can have significant noise impacts and should therefore be identified as necessary "out of hours work" within the requirements of section 18(3) and be included within the required specific phase CEMPs.	An updated Draft DCO was provided at Deadline 1 (REP1-021). The Applicant acknowledges that the receipt of oversized deliveries outside of core working hours has the potential to result in noise impact. However, the Applicant requires flexibility to deliver outside of core working hours, for instance on Sundays, when there is less traffic and consequently less effects on the road network. All oversized deliveries are subject to the controls provided for within the Framework Construction Traffic Management Plan (REP1-070) provided in relation to them and will be appropriately timed.
	Paragraph (5) states "core working hours" means the working hours stated in relation to the relevant operations at paragraphs (2) and (3)". Should this not read paragraphs 18(1)a and 18(1)(b)?	Noted. The Applicant will include this correction when it next submits an updated dDCO.
	20 Control of noise during the operation period.	
	I have serious concerns regarding the wording of this section as I do not consider this gives sufficient confidence in the level of noise mitigation that will be achieved for the Converter station will be as detailed in in Document 6.1.24 – Chapter 24 Noise and Vibration - Volume 1 (plus associated Volume 2 appendices).	An updated Draft DCO was provided at Deadline 1 (REP1-021). Requirement 20 of the draft DCO has been updated and requires compliance with the operational broadband and octave band noise criteria document (REP1-129), which will ensure that the operational impacts of the proposed development do not exceed those set-out in Chapter 24 of the ES (APP-139), as supplemented by section 17.2 of the ES Addendum (REP1-139). The broadband and octave band noise criteria document has been included as a certified document at Schedule 14 of the draft DCO. Please refer to section 1.1 of the operational broadband and octave band noise criteria document (REP1-129) for further information.
	Although it is appreciated that the final design and specific equipment has not been finalised there are significant assumptions made within the noise assessment to derive the conclusion that the impacts from the converter station are negligible. Specially in additional to the assumed embedded mitigation measures (section 24.6) additional mitigation measures are	Paragraph 24.6.1.10 of the ES (APP-139) explains why different mitigation measures may be appropriate at the design stage, and that the noise criteria must be achieved regardless of the mitigation measures ultimately used in the design. It is likely the type of mitigation measures ultimately used at the converter station will

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	identified in section 24.8(proposed mitigation and enhancement) with regards to one exposure location. It is therefore considered that this section needs to be reworded to ensure these specific requirements form part of the measures being proposed. This section needs to cross reference the measures identified within Documents 6.1.24 (sections 24.6 and 24.8) and this might also need to be added to Schedule 14 (Certified Documents).	be comparable with those included in the noise assessment (e.g. acoustic enclosures, attenuators and silencers). The updates to Requirement 20 of the draft DCO (REP1-021) robustly secure the noise criteria, which will ensure that the effects of operational converter station noise will be as presented in the noise and vibration assessment.

Table 7.17 – Applicant's Comments on Winchester City Council Local Impact Report – Utilities

Para No.	Local Impact Report Statement	Applicant's Response
4.6.15	The general character of the Hambledon Road section has been described in paragraphs 1.4.3-1.4.5 above. The concerns of the Council can be summarised quite simply as the following. Based on the level of detail that the applicant has submitted, the Council is concerned that the proposal to lay the two cable circuits in the highway have not been adequately explored in sufficient detail to provide an adequate level of confidence that the work can be undertaken with the ease and within the timetable put forward. A higher level of detail should be provided. Without this additional layer of detail, the applicant cannot justify the assertion that the impacts on road users will not be significantly adverse. The applicant's intention to rely on the contractor to decide on the precise route leaves too much uncertainty. That may be a suitable approach in other circumstances where the highway is wider and may include a bus lane, but not when negotiating a single carriageway which contains other services as evident by the presence of metal covers in Hambledon Road.	The duration of impacts is determined by the installation rate of the Onshore Cable Route based upon professional experience of similar projects. Additional work undertaken post-submission has further tested the 100m per week installation rate which used to calculate duration of impact. The refined installation rate assumptions are set out in paragraph 2.3.1.2 of the FTMS (REP1-068), and account for factors which may impact upon the speed at which ducts can be installed, including land use type and existing level of service congestion. Whilst there are amendments to the assumed rate of installation in certain locations, the overall timescales for the installation of the Onshore Cables remains as set out and assessed in the original ES. Further information in this regard is contained in the ES Addendum (REP1-139). All assessments of impacts are based upon a worst-case installation rate assumptions for robustness. Full utility searches have been conducted within the Order limits to identify existing utilities to the best available level possible without breaking open the surface of the highway (which is not appropriate or necessary at this time), identifying a single utility owner where there is potential for a diversion. All utility plans have been discussed with the relevant owners, with work ongoing with regards to protective provisions. The duration of works set out in the FTMS are realistic and achievable. The construction of the onshore cable route within the highway has been fully assessed within the Transport Assessment (APP-448), Chapter 22 of the ES (APP-137), the Supplementary Transport Assessment (REP1-142) and ES Addendum (REP1-139).
	It does not appear that the applicant has undertaken any survey work beyond trial holes in the verges. Exploratory work using a combination of trenching across the road to pick up services and then using radar to follow these services along the road would provide a higher level of confidence. It is hoped that the applicant has used the 5 month delay period to work on the collation of more data on this matter. It is noted that radar will not pick up all services such as those in clay pipes	Full utility searches have been conducted within the Order limits to identify existing utilities to the best available level possible without breaking open the surface of the highway (which is not appropriate or necessary at this time), identifying a single utility owner where there is potential for a diversion. All utility plans have been discussed with the relevant owners, with work ongoing with regards to protective provisions. The duration of works set out in the FTMS are realistic and achievable.
	The applicant has indicated that the two circuits need to be suitably separated from each other. The lack of detail on what services are already in the road raises the concern that it may not be technically possible to install	Full utility searches have been conducted within the Order limits to identify existing utilities to the best available level possible without breaking open the surface of the highway (which is not appropriate or necessary at this time), identifying a single utility owner where there is potential for a

Para No.	Local Impact Report Statement	Applicant's Response
	the cable circuits whilst maintaining the necessary separation distance, protecting workers and still maintaining traffic flow. Any extended delays to the movement of traffic will have implications not just on residents but also on emergency vehicles. The concern is that the circuit installation may become more complicated than anticipated which may result in a greater period of time when one of the lanes is closed resulting on longer delays or at worse, a proposal to close the road altogether.	diversion. All utility plans have been discussed with the relevant owners, with work ongoing with regards to protective provisions. On detailed review of the utility data the Applicant is satisfied that the necessary limited level of flexibility included for within the Order limits ensures that the Proposed Development is deliverable, and that it can be delivered within the indicative timescales outlined, which take into account areas of heavy service congestion and are based on the professional judgements of experienced cable engineers and contractors familiar with the works to be undertaken. The Applicant notes the reference to emergency services and refers to WCC to the Applicant's response to ExA WQ TT1.16.2 (REP1-091), which confirms that the Applicant has engaged with Hampshire Police alongside the Fire Service and NHS. Each emergency service has confirmed they are satisfied with the engagement to date and with the mitigations proposed in respect of traffic impacts If for any reason unforeseen impacts occur they will be addressed as detailed in the FTMS (REP1-068) and FCTMP (REP1-070) as secured by the dDCO (REP1-021).
	Confidence in the approach being adopted by Aquind may be enhanced if they could identify any similar utility proposal that took twin trenches along a similar distance of public highway.	The applicant refers the following schemes which are comparable in terms of utility congestion in an urban environment, trench dimensions and twin circuit installation. These schemes are: 1. Dewar Place 275kV – Scottish Power Energy Networks, Edinburgh 2. Nechells 132kV – Western Power Distribution, Birmingham 3. North Hyde to Hayes 66kV, Scottish and Southern Energy, Slough

8. APPLICANT'S COMMENTS ON SOUTH DOWNS NATIONAL PARK AUTHORITY LIR

8.1. INTRODUCTION

8.1.1.1. This section of the document contains the Applicants response to SDNPA's LIR (REP1-178).

8.1.1.2. The Applicant has structured their response in line with the LIR submitted by SDNPA.

8.1.1.3. The Applicant has provided responses to points where it is considered this will assist the ExA in considering the point raised in the LIR.

9. COMMENTS ON SOUTH DOWNS NATIONAL PARK AUTHORITY LOCAL IMPACT REPORT

9.1. APPLICANT'S COMMENTS ON LOCAL IMPACT REPORT

Table 9.1 - Applicant's Comments on South Downs National Park Authority Local Impact Report

Para No.	Local Impact Report Statement	Applicant's Response
The Proposal		
2.15 – 2.16	A temporary construction compound would be located within the Converter Station Area for the duration of the construction (approximately 3 years). It would have facilities for mess, welfare and approximately 150 car parking spaces. Temporary fencing will be used to secure the areas under construction during the construction works. The construction compound would have a total footprint of approximately 4 – 5 ha. Vegetation would be removed in some areas and earthworks may be required to create a level platform, which will be covered with crushed stone. At the peak of construction, up to 86 HGV movements per day are envisaged, with up to 20 telescopic cranes and approximately 150 personnel on site.	The Applicant refers to the updated Work Plans issued at Deadline 1 (REP1-014) which corrects the location of Work No.3 (to same areas previously shown on the indicative plans) and corrects the number of parking spaces to 206 vehicles. It is confirmed this is not an increase in the number of personnel involved in the Construction of the Converter Station, but accounts for vehicles of workers associated with the installation of the Onshore Cable Route. In addition, an Indicative Temporary Carpark and Compound Drainage Layout was issued as a part of Deadline 1 (Appendix 6 of the Outline Onshore Construction Environmental Management Plan (OOCEMP) (REP1-087).
The South Downs National Park		
3.8	SDNPA sets out the requirements of Section 62 of the Environment Act 1995: In addition, Section 62 of the Environment Act 1995 also requires all relevant authorities, including statutory undertakers and other public bodies (such as the Planning Inspectorate) to have regard to these purposes. This ensures that relevant authorities take account of these purposes when coming to decisions or carrying out their activities relating to or affecting land within these areas. It recognises that a wide range of bodies have a direct influence over the future of National Parks in terms of policy, project implementation, casework decisions, land ownership and management. It also acknowledges that the fulfilment of National Parks' statutory purposes rests not only with those bodies directly responsible for their management but that it also relies on effective collaborative working.	It is noted that relevant authorities when exercising or performing any functions in relation to, or so as to affect, land in any National Park, shall have regard to the two purposes of the National Park, further discussed below. The Applicant notes this duty is provided for at Section 11A of the National Parks and Access to the Countryside Act 1949 as amended by Section 62 of the Environment Act 1995, rather than being a duty imposed by Section 62 of the Environment Act 1995.
3.9	Where there is an irreconcilable conflict between the statutory purposes, statute (Section 11A(2) of the 1949 Act (inserted by section 62 of the 1995 Act)) requires any relevant authority, when exercising or performing functions which relate to or affect land in a National Park, to attach greater weight to the purpose of 'conserving and enhancing' if it appears that there is a conflict between the two National Park purposes. Giving priority to the first purpose of the National Park is known as the Sandford Principle.	Reference to the Sandford Principle is noted, and it is acknowledged this principle applies where there is a conflict between the purposes, rather than a conflict with the purposes. The two purposes are: (a) of conserving and enhancing the natural beauty, wildlife and cultural heritage of the areas specified in the next following subsection; and

Para No.	Local Impact Report Statement	Applicant's Response
		(b) of promoting opportunities for the understanding and enjoyment of the special qualities of those areas by the public. Section 65 of the Environment Act 1995 enshrined this principle in law at Section 11A of the National Parks and Access to the Countryside Act 1949.
3.10 – 3.11	National Parks have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty (Overarching National Policy Statement for Energy (EN-1), 2011, paragraph 5.9.9 and NPPF, 2019, paragraph 172). The Overarching National Policy Statement for Energy (EN-1) states at paragraph 5.9.12 that the duty to have regard to the purposes of nationally designated areas, such as National Parks, also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them. Paragraph 5.9.12 states that the aim should be to avoid compromising the purposes of the designation and that development proposals should be designed sensitively given the various siting, operational and other relevant constraints.	This policy requirement is noted. It is confirmed that the Applicant has had regard to the purposes of the National Park when considering alternatives in relation to the Proposed Development, and also when designing the Proposed Development in this location so as to avoid any potential to compromise the purposes of the designation of the National Park.
South Downs Local Plan and Other Relevant Local Policy		
4.5	The South Downs Integrated Landscape Character Assessment (SDILCA) (2011) helps inform the assessment of impacts on landscape character that would be caused by the development proposal. In the case of character area D2a, it specifically identifies that the strong rural, secluded character of the landscape may be threatened by expansion of settlements / development that abut the National Park's southern edge. In addition, it identifies key landscape management and development considerations, such as the diversification of land use leading to the degradation of landscape features (including poorly managed hedgerows) and monitoring the incremental changes on the edge of Horndean to prevent urban spill so as to maintain the tranquil, rural character.	The Applicant notes this response and refers to ES Chapter 15 Appendix 15.4 Landscape Character (APP-402) and the management strategy for Landscape Character Area D2Hambledon and Clanfield Downland Mosaic in the SDILCA and Landscape Character Area 3a Clanfield Downland Mosaic in the East Hampshire District Landscape Character Assessment. Both outline the need to "monitor incremental change on the edge of Horndean, consider opportunities to enhance integration of the urban edge to maintain the tranquil, rural character of the downs."
Planning Issues and Relevant Policies and Guidance		
5.4	The SDNPA consider that the development proposed (namely the Converter Station and associated above ground development) would cause significant harm to the setting of the National Park and views to and from the National Park.	The Applicant refers to the Applicant's Response to Relevant Representations - South Downs National Park Authority (RR- 049) submitted at Deadline 1 (REP1-160) which responds to SDNPA's concern that the location and scale of the Converter Station will cause significant harm to the setting of the SDNP. The conclusions in the ES Chapter 15 (APP-130) confirm that on completion and in the early years of operation there would be significant effects on the setting of the SDNPA as perceived within 3km of the Converter Station Area. However, the degree of effect would reduce over time as planting matures. , becoming non-significant by year 20. Some visual receptors within 3 km of the Converter Station would experience significant adverse visual effects including views experienced by recreational receptors from elevated positions within the SDNP.

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		The Proposed Development has been carefully designed taking account of impacts on landscape and visual amenity, having regard to siting, operational and other relevant constraints to minimise harm to the landscape and visual amenity, providing reasonable mitigation. With regard to the mitigation proposed, given the necessary size of the Converter Station taking into account its functional requirements it will always have a post mitigation residual impact. It is noted in this regard that NPS EN-1 acknowledges in relation to landscape impact and decision making at paragraph 5.9.8 that "*virtually all nationally significant energy infrastructure projects will have effects on the landscape*" and that "*Projects need to be designed carefully, taking account of the potential impact on the landscape… to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.*" This is the case with the Proposed Development. . .
5.4.1	The impact from siting buildings of the large size and scale proposed so close to the National Park. The proposed Converter station buildings are significant both in terms of footprint and height.	The Applicant refers to the Supplementary Alternatives Chapter (Appendix 3, REP1-152) submitted for Deadline 1 which sets out further information in relation to the assessment of alternatives carried out by the Applicant. Section 5 of the Supplementary Alternatives Chapter provides further information on the grid connect point and assessment of the shortlisted options, namely Chickerell, Bramley and Lovedean substations. The Applicant also refers to its response to ExA WQ MG1.1.1 (REP1-019) in relation to the rationale and justification for confining the siting search for the Converter Station to 2km from the existing Lovedean substation. Both are relevant for the purposes of understanding why the Converter Station is located in the location it is, and why it is considered this is the most appropriate location for the Converter Station forming part of the Proposed Development. The Applicant refers to the Applicant's Response to Relevant Representations – South Downs Naitonal Park Authority (RR- 049) and CPRE Hampshire (RR-028) submitted at Deadline 1 (REP1-160) which responds to comments regarding the location, scale, height and width of the Converter Station. The Applicant also refers in the Relevant Representations to the nature of effect of landscape and visual effects during construction and operation, and how these have been mitigated as far as practicable through the development or and adherence to the Design Principles in the updated DAS (REP1-031) and maintenance of existing vegetation within the Order limits during the operational lifetime of the Converter Station which serves an important visual screening function as referred to in the updated OLBS (REP1-034). The Applicant notes the Converter Station is located in close proximity to the existing industrial feature of the Lovedean Substation and the associated overhead line terminal towers, which are relevant in the context of the overall visual nature and landscape character of the location of the Converter Station.The response to 5.4.2 below is relevant

Para No.	Local Impact Report Statement	Applicant's Response
		in realtion to the understanding of the reasons for the Converter Station biuldings being the size they are, being driven by the need to meet their operational requirements.
5.4.2	The functional and utilitarian appearance of the buildings will be prominent and will have the effect of changing the character of the landscape and the perception of it when viewed from the SDNP from one with an essentially rural character to one which is far more industrial.	The Applicant refers to the Applicant's Response to Relevant Representations East Hampshire District Council (RR-162) and CPRE Hampshire (RR-181) (REP1-160) submitted for Deadline 1 which explain the nature of effects associated with the Converter Station and the design principles used to integrate the buildings. The landscape of the Converter Station Area immediately around the buildings will change as a result of the development. However, this change in character is very localised, and the local landscape is already partly characterised by the existing Lovedean Substation and, particularly the overhead terminal towers / pylons and lines which are of an undisguised industrial nature. The form of the buildings, of necessity, reflect their function, however the Applicant does not agree with the suggestion that they are 'utilitarian'. They have been carefully designed to be of interest to immediate visual receptors (ncluding users of Old Mill Lane, Monarch's Way, PRoW to the south and residential receptors) where they are visible at close range and less than one kilometre away from the buildings, whilst being visually recessive when viewed from further afield. Appendix 1 Converter Station Design Approach (MG1.1.3) (REP1-092) is relevant to explaining the design approach to the Converter Station alongside the updated Design and Access Statement REP1-031) submitted for Deadline 1 and supporting design principles within the document.
5.4.3	The Converter Station will be visible in both close range views and those from higher locations within the National Park looking towards Portsmouth and the South Coast. The Converter Station will harm local views out of the National Park, including from Monarchs Way (a long distance trail).	The Applicant refers to the Applicant's Response to Relevant Representations - South Downs National Park Authority (RR- 049) submitted at Deadline 1 (REP1-160) which refers to the significant adverse visual effects which would be experienced by some residents within a 1.2km radius and recreational effects on some users within a 3km radius, including on users of the Monarch's Way. It is acknowledged in the ES that the buildings will inevitably have a significant impact in close views, some of which, following mitigation, will remain significant in the long-term. Virtually all nationally significant energy projects will have an effect on landscape, as acknowledged by NPS EN-1. It is likewise acknowledged in the ES that the buildings will be visible from higher ground in the SDNP, particularly from some more distant viewpoints. However, there would not be a significant effect on any receptors beyond 3 km. Regarding Monarch's Way, this is most clearly illustrated by Viewpoint C which shows that locally there would be a significant impact in the short term but that this is fully mitigated over time by planting. It should also be borne in mind that this effect is seen over several hundred metres of an 87 km long-distance route.

Para No.	Local Impact Report Statement	Applicant's Response
		The primary purpose of the landscape mitigation screening directly around the Converter Station is to reduce substantially the visibility of the buildings in near and middle distance views. In addition, as stated in the updated OLBS (REP1-034), the landscape design has been revised to include a wider range of planting stock including a proportion of larger trees, to provide a greater degee of immediate mitigation.
5.4.4	The long access track (1.2km long and up to 7.3m wide) will widen the extent of the land impacted by the development beyond the immediate confines of the proposed buildings (including providing a further urbanising access to Broadway Lane, which is currently rural in character).	The Applicant refers to the Applicant's Response to Relevant Representations South Downs National Park Authority (RR-049) and East Hampshire District Council (RR-162) (REP1-160) submitted for Deadline 1 and how measures have sought to reduce the visual prominence of the access track through planting referred to in the updated OLBS (Rep-034) and design principles (REP1-031). The location and alignment of the access track is substantially determined by the engineering requirements of bringing large indivisible loads into the site, whilst avoiding the belt of ancient woodland directly south of the Converter Station, set back from PRoW along the south of the site and set back from Broadway Cottages. This has provided the opportunity to introduce new hedgerows to improve ecological connectivity and to create smaller fields which immitate those to the west of Stoneacre Copse. The permanent surfacing of the road and landscape will be subject to detailed design approvals as referred to in the dDCO (REP1-021).
5.4.5	Adverse impact of the Converter Stations on the tranquillity of the National Park (one of its special qualities)	The Applicant in ES Chapter 15 (APP-130) addressed the effects on tranquillity during construction in section 15.8.3 which states that noise and activity arising from construction activity traffic would affect tranquillity locally generating significant adverse effects. The Converter Station is enclosed and unmanned; there would be only very occasional visible activity during operation. The simple presence of the building would not disturb the calm and therefore could not affect tranquillity. As noted in Appendix 15.5 South Downs National Park (APP-403), the adjacent part of the SDNP is the "Dip Slope." The SDNPA Local Plan lists the Special Qualities that apply to each area of the Park. Special Quality 2 "Tranquil and unspoilt places" is not referred to in relation to the "Dip Slope," a judgement which must equally apply " and consequently into the context of the Converter Station Area. Appendix 15.5 Table 1 (APP-403) considers the relative tranquillity of the Converter Station Area and finds that it is mixed. "Positive factors which contribute to tranquillity include the relatively unmanaged woodland and hedgerows, native deciduous trees, sense of openness and panoramic views on higher ground, and peace and quiet in specific locations. This contrasts with the unsettled nature of some of the surrounding properties and land uses including those set aside for horsiculture and recreation, presence of overhead lines clustering around Lovedean Substation and an associated low 'hum'". The criteria used in this table were taken from the South Downs Landscape Background Paper which drew on factors defined by Natural England to assess natural beauty.

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		On the basis that the National Park boundaries as defined were informed by the "Special Qualities", that the Converter Station Area was not regarded worthy of inclusion within the boundary of the National Park is notable.
5.4.6	A lack of information about the design and appearance of the Converter Station, leaving much of this to post approval consideration.	The Applicant disagress with this response andrefers to the Applicant's Response to Relevant Representations (REP1-160) at section 5.24 Converter Station Location and Design which responds to a number of RR's and South Downs National Park Authority (RR-049) where the SDNPA states that they are broadly content with the design parameters, a separate Position Statement – Appendix 1 Converter Station Design Approach WQMG1.1.3 (REP1-092) submitted alongside ExA WQ MG1.1.3 (REP1-091) and the updated Design and Access Statement (REP1-031 and 032) submitted at Deadline 1. An entirely appropriate level of design information has been provided to confirm the principles for the approach to the design of the Converter Station for the purpose of providing a consent which secures the parameters and the principles with which it will be delivered. It is also noted the SDNPA will be consulted on the design approvals. Despite the comments made, the Applicant notes the SDNPA has not requested any further level of design information, and in fact in instances is seeking for less information to be secured (for instance in relation to the colour palette to be utilised) which is a position that is not supported by the Applicant.
5.4.7	Concerns about the landscaping strategy proposed, including that not all of the proposed mitigation areas appear to be in the applicant's control, the lack of a strategy to deal with Ash die back and the need to use a bigger range of planting sizes to help provide screening at an earlier stage.	The Applicant notes this response. All elements of the proposed landscape mitigation plan fall within the Order Limits. As referred to in the SoCG paragraph 4.3.10 submitted for Deadline 1 (REP1-121) the Applicant has explained that hedgerows within the Order Limits will be managed through the mechanisms set out in the updated OLBS (REP1-034) which are secured through the submission and approval of a detailed landscaping scheme as required by draft DCO Requirement 7. Requirement 8 secures the maintenance of landscaping. From an ownership perspective, compulsory acquisition of the land on which the existing hedgerows are located would not be justified and is not sought. The Applicant is seeking rights and restrictions through the Order over those existing hedgerows, which is a proportionate and appropriate approach. The Applicant has commissioned an ash dieback survey and will share the findings of the survey in due course and this is discussed in the SoCG paragraph 4.3.7 (REP1-121). The updated OLBS (REP1-034 and 035) at paragraph 1.6.7.1 recognises the need for a mix of plant stock (of local provenance where practicable) including larger trees in specific locations and native 'pioneer' species to create variations in the woodland structure and mix. This will provide the screening at an earlier stage referred to.

Para No.	Local Impact Report Statement	Applicant's Response
		Requirement 7 of the dDCO (REP1-021) which requires the submission and approval of a detailed landscaping scheme includes specific reference to the location, species, size, planting protection measures and planting density of any proposed planting. The discharging authority is required to consult with SDNPA as part of the approval process.
5.5	The SDNPA considers that an appropriate S106 planning obligation is required to mitigate and offset the harm the development would cause to landscape character by delivering agreed and significant landscape enhancements within the local area. In the current absence of such agreed obligations the proposal is considered to cause significant harm to the setting of the National Park.	The OLBS and the management and maintenance of the landscaping to be provided in accordance with that document and the Landscaping Rights to be sought over existing vegetation to ensure it is maintained and managed are adequate to mitigate the impacts of the Proposed Development. I t is not understood what the SDNPA consider any Section 106 planning obligation would be related to, or why this would be justified taking into account the relevant tests. The Applicant would be grateful for the SDNPA to provide further specificity on both points, so that it may meaningfully consider any proposal.
5.7	Although disappointing that the applicant has chosen not to deliver biodiversity net gain the SDNPA are broadly supportive of the approach taken by the applicant to biodiversity matters. However, the proposed development will result in the loss of trees and hedgerows, of which some of the hedgerows have been categorised as important under the Hedgerow Regulations and which are therefore also priority habitat under the Natural Environment and Rural Communities Act.	Please see the Biodiversity Position Paper (REP1-138) with regard to the post-development position in relation to hedgerows. All hedges are replaced with the same type of hedge or one of higher ecological value, resulting in a +4.25 units for Hedgerow Priority Habitats calculated in accordance with the Biodiversity Metric 2.0.
5.9	There are no high value heritage assets within the Order Limits but there are listed buildings within the National Park within 1km and 2km of the proposed Converter Station buildings. The applicant's Environmental Statement has described and assessed the impact of the proposed Converter station buildings on surrounding above ground heritage assets in the National Park as negligible or, in the case of Scotland Cottage to the north, minor adverse. However the SDNPA is currently undertaking site visits to a number of heritage assets in the National Park to see if it agrees with this analysis.	The Applicant notes SDNPA comments with regard to heritage assets. The Applicant has completed a robust assessment of the heritage assessts and awaits SDNPA comments following their review.
5.10	The SDNPA notes that Hampshire County Council, as Highways Authority, will be making representations regarding the highways impacts of the proposed pipeline through the examination process. The SDNPA wishes to make just two comments at this stage: i. The SDNPA is generally content with the construction traffic routing strategy put forward in the Framework Construction Traffic Management Plan (examination reference APP-450). This sees construction traffic accessing the site from the A3 to the east and largely avoiding the National Park. However, the SDNP should be identified in the Framework STMP (which it is not currently) as a sensitive receptor and it should be identified as a specific issue and constraint (e.g in table 5 of the Framework CTMP). This is because tranquillity is one of the special qualities of the South Downs National Park and it should be explicitly referenced and taken into account.	The Applicant assumes that the reference to "STMP" is a typographical error and is intended to say "CTMP". The Applicant notes that the SDNPA seeks the inclusion of the National Park as a sensitive receptor for the purposes of the Framework CTMP (REP1-070 and 071). The Applicant dos not agree with the view of the SDNPA that this is necessary and the reasoning for this is set out below. As noted in the Framework CTMP, at paragraph 3.4.1.1., the HGV routes will be communicated to all hauliers and managed/enforced by the contractor. These routes will avoid the National Park. HGVs will be using roads already permitted for HGV use, including Day Lane.

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	ii. The SDNPA supports the inclusion of proposed DCO Requirement number 17 that requires the submission and approval of a Construction Traffic Management Plan. The SDNPA does, however, respectfully request that this document be submitted to and approved by the relevant Local Planning Authority (after consultation with the SDNPA in respect of the Converter Station Area), rather than the relevant Highway Authority. Construction Traffic Management Plans give rise to local planning considerations (such as tranquillity and impacts on residents) and Local Planning Authorities are best placed and used to handling such documents, not least because they are ordinarily determined by them.	The area surrounding the proposed Converter Station is agricultural in character, including fields under crop which will generate movement by large vehicles such a tractors with implements and harvesters. HGV movements associated with the Converter Station Area will be time-restricted to between 09:00 and 17:00, as noted in the ES chapter 22 (APP-137) at paragraph 22.4.6.6. and as set out in paragraph 3.3.2.4. of the FCTMP (REP1-070 and 071). These are the only HGV movements associated with the proposed development that will pass the SDNP. Finally, HGV movements associated with the construction of the Converter Station will be limited and temporary. As set out in Table 10 of the Supplementary Transport Assessment (REP1-142), the maximum level of forecast HGV activity amounts to 43 arrivals and 43 departures per day. When spread across the 8 hour duration where HGV activity is permitted, this would equate to approximately five HGV arrivals and five HGV departures per hour. In terms of two way movements, this would equate to one HGV every six minutes during this time, which is not considered to be a significant. number, given the mitigation measures set out in the CTMP. It is the view of the Applicant that the formal approval of the final CTMP should be provided by the relevant highway authorities, and that in any event it is not necessary for the SDNPA to be involved in the approval process.
5.13	Whilst permanent lighting is proposed as part of the scheme the applicant has explained that this will only be used in exceptional circumstances as a result of security needs or for unplanned maintenance. Up to 40 lighting columns are proposed (page 37 of the draft DCO, examination library reference APP-019) for the finished converter station whilst lighting will also presumably be needed for its construction. Both the construction and operational lighting has the potential, unless appropriately mitigated, to harm Dark Night Skies and the SDNPA are currently in discussions with the applicant on this point.	The Applicant has provided further information on lighting at Deadline 1. The updated OOCEMP (REP1-087) states at paragraph 5.2.2.1 that the appointed contractor will develop a Lighting Scheme for the Construction and Operational Stages of the Converter Station Area in consultation with the South Downs National Park to be submitted for approval to the relevant Local Planning Authority. Requirement 16 (REP1-021) requires approvals in relation to external construction lighting, to be approved in consultation with SDNPA. The working hours at the Converter Station are also restricted to 0800 – 1800 (with an allowance for an hour either side for start up and shut down activities) (Requirement 18 (REP1-021)). External lighting associated with the operational stage will be included in the design approavals provided for by Requirement 6 (REP1-021). Requirement 23 confirms there will be no external lighting of Works No.2 during the hours of darkness save for in exceptional circumstances, including in the case of emergency and where urgent maintenance is required. The information submitted and the controls and approvals required are wholly adequate to address lighting effects and ensure there will not be harm to Dark Night Skies.
5.14	The SDNPA welcomes proposed DCO Requirement 16 which controls external construction lighting. Proposed DCO Requirement 23 is helpful but should also be expanded in a similar way to Requirement 16 to require written details of any external,	The Applicant refers to point 5.13 above.

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	permanent lighting to be installed in connection with the Converter Station to, after consultation with the SDNPA, be submitted and approved by the relevant local planning authority. This would enable the SDNPA to review and comment on both construction and operational lighting to ensure that it does not harm Dark Night Skies.	
5.17	The South Downs National Park Tranquillity Study (2017) sets out relative tranquillity across the National Park. The area of the proposed Converter Station and surroundings is in an area of generally moderate tranquillity, broadly increasing slightly as you pass into the National Park. This is to be expected given that this area is generally rural in character.	The Applicant refers to point 5.4.5 above.
5.19	Once the Converter Station has been constructed the presence of large, utilitarian buildings will detract from the tranquillity of this otherwise generally rural area.	The Applicant refers to point 5.4.5 above.
5.20	The SDNPA welcomes proposed DCO requirement 20 that requires submission of a Noise Management Plan in respect of the Converter Station building. This will be important to ensure that the ongoing operation of the proposed development is not audible within the National Park. However, the SDNPA request that this requirement is discharged, in respect of Work Area 2, after consultation with the SDNPA because of the potential tranquillity impacts. Such an approach and wording is already taken and used with proposed Requirements 6 (design), 7 (landscaping) and 16 (external construction lighting).	Revised wording for Requirement 20 of the Draft DCO (REP1-021 and 022) was submitted at Deadline 1, which requires compliance with the operational broadband and octave band noise criteria document (REP1-129), which will ensure that the operational impacts of the proposed development do not exceed those set-out in Chapter 24 of the ES (APP-139), as supplemented by section 17.2 of the ES Addendum (REP1-139). Audibility is not an appropriate noise criterion because it is subjective and therefore cannot be quantified. Given the noise requirements to be met are already clearly set out the operational broadband and octave band noise criteria document, it is not considered there is any need for the SDNPA to be consulted in relation to this Requirement. The level of compliance to be achieved is already secured.
5.21	During construction it is inevitable that the works will give rise to localised disturbance to amenity. This needs to be considered carefully, including any potential impacts on the pitches for Gypsies, Travellers and Travelling Showpeople to the north and west, some of which consist of mobile homes and caravans. It is likely that making any enhancements to the homes to reduce any impacts of noise will be harder to achieve successfully than in bricks and mortar properties and the impacts may be disproportionately larger on these residents as a result.	The Applicant notes the comments with regard to localised disturbances. The Applicant refers to the updated Outline Onshore CEMP (REP1-087 and 088). With respect to noise and vibration, the predicted impacts of construction in the converter station area are presented in section 24.6.2 of the ES (APP-139). In summary, the effects are expected to be no greater than minor adverse (not significant). The mitigation measures applicable to construction activities at the converter station are contained in section 5.12 of the Outline Onshore CEMP Rev 002 (REP1-087 and 088), and are focused at mitigating noise at source. The magnitude of construction noise levels predicted at the receptors surrounding the converter station are not expected to exceed the thresholds of potential eligibility for noise insulation contained in British Standard 5228-1:2009+A1:*2014 Code of practice for noise and vibration control on construction and open sites*.
5.30	The SDNPA note that should the proposal receive consent the converter station would, as stated in the applicant's Environmental Statement, have a lifetime of approximately 40 years. The SDNPA request that if the proposal ceased to be in use that the converter station associated with the Aquind Interconnector be removed and the land restored to its previous state within 12 months of the use ceasing. The SDNPA respectfully requests that a DCO requirement be imposed to ensure this.	Consent for decommissioning will be sought at the time and the requirements imposed in relation to the decommissioning will reflect the operations and timescales that are required to achieve this. The decommissioning of the Converter Station and the Onshore Cable Route would be a matter for a future consent.

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5.31	Comments on the proposed DCO Requirements (Schedule 2 of the DCO) have been made under the topic specific headings above. However, the SDNPA also wishes to make the following observations. The remarks are set out in table format for ease of reference. 1. A statutory nuisance by its very definition is harmful. We do not consider that a defence against this should be written into the DCO. Rather the emphasis should be on managing and controlling such matters so as to ensure that a statutory nuisance does not arise. 2. It is considered that all such references should be changed to 40 working days, as of course is the general situation with the discharge of planning conditions in England. This comment is particularly important to those where the details may have an impact on the setting of the National Park. It is our view that 20 days is insufficient in any case, but particularly as it does not allow the time, where needed, for the relevant Local Planning Authority to consult SDNPA and for us to review and formulate a response. 3. In relation to Article 30, these are rather arbitrary powers that conflict with the assurances and commitments given elsewhere in the development proposal (for example around the retention of vegetation). 4. In relation to Article 31, This gives the applicant the ability to lop or fell any tree within or overhanging the Order limits. It also gives the applicant the ability to remove any hedgerows within the Order limits (including important hedgerows). This is a blanket power without any real constraint on its use. 5. In relation to Schedule 1 Work No.2, it would be helpful if this list identified which pieces of equipment would be within the Convertor Station and which would be outside as this helps in any assessment of the likely landscape impact. The SDNPA's intention would be to minimise as far as it possible the sense of 'clutter' in the landscape caused by considerable amounts of equipment being present in the open air. As the terminology is necessarily technical and there are limited sites with which to compare this, clarity is essential in order to assess impact. 6. In relation to the lighting columns and the lightning columns, we are concerned about the number of such columns which do not appear on the indicative elevations and which could have a significant negative impact depending on design and location. The design strategy appears to be one of simplicity, but the addition of these columns will break up that appearance. They are a permanent feature which will only be used in emergencies and we question whether this approach is necessary.	1. Only nuisance associated with noise is relevant. The position in relation to noise is secured by Requirement 20, as set out at 5.20 above. The explanation of the reasons for this Article being included and why it is required is provided at paragraph 6.16 of the Explanatory Memorandum (REP1-024). 2. The position in the dDCO is that 20 Working Days are provided for approval. A 40 Working Days period would not allow the the Proposed Development to come forward in good time and an efficient manner. 20 Working Days is therefore considered to be appropriate. 3. Article 30 is an authorising power. It does not permit works which are not in accordance with the control documents and the approvals obtained in accordance with the relevant Requirements. 4. Article 31 is an authorising power. The statement made that this is a blanket power with no constraint on its use is not correct. All removals will be in accordance with the plans required to be produced in accordance with the OLBS (as per Requirements 7, 8 and 9), which provides controls in relation to the use of this power. 5. Internal equipment is not listed in Work No.2, as it is not necessary to do so, it is not development for the purposes of the Planning Act 2008. The design of the Converter Station Area is controlled through Requirement 6, with the approval sought to be consulted on with the SDNPA. Design principles are applicable to prevent visual clutter of the buildings and equipment across the Converter Station Area (building design principle 4 detailed in the Design and Access Statement (REP1-031)). 6. The maximum number of lightning and lighting columns has been included to meet operational requirements. Whilst lighting will only be used in emergency situations and for maintenance, it is absolutely required. Without this the Converter Station would not meet necessary operational and security requirements. The impacts of these have been fully taken into account in the LVIA, being slender structures discernible from short distances. 7. This matter is continuing to be discussed in the group design meetings with the relevant LPA's which the SDNPA attends to ensure there is sufficient comfort in the scope for the design without unnecessarily restricting how the Converter Station may be designed and which may have impacts on how it can be maintained during the operational period. 8. Please see the Applicant's response to ExA WQ DCO1.5.7 (REP1-091).

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	7. The SDNPA objects to external projections such as telecoms, plant, guttering. The parameters given by the applicant are already sizeable and should contain the entirety of the development proposal. To do otherwise would give the SDNPA and other LPAs no idea of what height and form such external projections may take. This is unacceptable in this rural area and adjacent to the setting of a National Park. 8. In relation to Table WN2, we query why various measurements are omitted from this table.	

10. APPLICANT'S COMMENTS ON EAST EAST HAMPSHIRE DISTRICT COUNCIL LIR

10.1. INTRODUCTION

10.1.1.1. This section of the document contains the Applicants response to EHDC LIR (REP1-161).

10.1.1.2. The Applicant has reviewed the contents of the LIR and has provided responses to points where it is considered this will assist the ExA in considering the point raised in the LIR.

11. COMMENTS ON EAST HAMPSHIRE DISTRICT COUNCIL LOCAL IMPACT REPORT

11.1. APPLICANT'S COMMENTS ON LOCAL IMPACT REPORT

Table 11.1 - Applicant's Comments on East Hampshire District Council Local Impact Report

Para No.	Local Impact Report Statement	Applicant's Response
Introduction		
1.1 - 1.4	The introductory section of the LIR sets out that East Hampshire District Council (EHDC) is a host authority for part of the Proposed development and is impacted by parts of the development that fall outside EHDC administrative area. EHDC acknowledge that engagement with the Applicant during pre-application. A SoCG has been prepared between the parties, and discussions are ongoing. Through the LIR EHDC wish to raise the following issues: • Landscape impacts incorporating the design parameters; • Ecological implications; • Construction traffic and impacts on local amenity; and • Noise The development has been considered against Local Plan policies and EHDC provide policy considerations and view on impacts.	The contents of the introductory section of EHDC's LIR is noted.
2 Site description		
2.2	The Converter Station area is a rural area comprising a mixture of arable fields, grazing paddocks, small woodlands and hedgerows and isolated and small groups of development. The Lovedean Substation is a dominant landscape feature, however, its visual impact in the local landscape is mitigated by mature trees that surround the majority of its sides.	The Applicant does not disagree with this statement but considers it misses a key point. The landscape whilst rural is characterised by the existing Lovedean Substation and, particularly the overhead terminal towers / pylons and lines which are undisguised and industrial in nature. As described in ES Chapter 15 (APP-130) paragraph 15.5.3.4 "the existing Lovedean Substation, associated pylons and overhead lines are dominant elements in the landscape of the Converter Station Area and immediate surrounding area"
2.4	There is a clear transition in the landscape westwards of Horndean as development becomes fragmented along Lovedean Lane towards the substation. There is a solar farm to the southern side of Day Lane and together with the substation and associated overhead power-lines, there is a hardening of the landscape with such forms of infrastructure. However, the area surrounding the substation retain a rural character, reinforced by the proximity of the South Downs National Park to three sides. The area is consistent with the Downland Mosaic character type as defined in the East Hampshire Landscape Character Assessment. Although the substation area is in relatively close proximity to built up areas at Horndean and	Whilst the Applicant agrees that development does become fragmented along Day Lane towards the substation, the Applicant does not consider that there is little or no visual connectivity between the built up edges of Horndean and Denmead and Lovedean substation. In winter, the existing Substation is partially visible and the overhead line terminal towers, some of which are over three times the height of the substation (paragraph 15.5.3.34, ES Chapter 15 (APP-130)), are clearly visible. The terminal towers and overhead lines visually connect the Substation to its surroundings.

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	Denmead, there is little or no visual connectivity between them, which again reinforces the rural quality of the site.	As referred to at point 2.2 above the "rural character" is compromised by these dominant elements in the landscape of the Converter Station Area and immediate surrounding area.
2.5	The Landscape and Visual Amenity chapter of the Environmental Statement provides a baseline environment description of the area (15.5), which captures the relevant local landscape features and considerations such as local rights of way, historic landscape assets and the designated landscape, the South Downs National Park.	Noted and agreed in the Statement of Common Ground (SoCG) with East Hants District Council (EHDC) paragraph 4.3.4 (REP1-120) submitted at Deadline 1.
3 Statutory Development Plan		
East Hampshire District Joint Core Strategy		
	The following Policies have been identified By EHDC as being relevant to the Proposed Development. **CP1 Presumption in favour of sustainable development** The policy reiterates the presumption in favour of sustainable development set out in the NPPF. It states planning applications that accord with the policies in the Local Plan will be approved without delay, unless material considerations indicate otherwise. **CP2 Spatial strategy** Directs development to the most sustainable locations in accordance with a settlement hierarchy. **CP19 Development in the countryside** The approach to development in the countryside is to operate a policy of general restraint in order to protect the countryside for its own sake and the only development allowed in the countryside is that with a genuine and proven need such as that necessary for farming, forestry or other rural enterprise. **CP20 Landscape** This policy sets out a number of criteria that seek to ensure the special characteristics of the District's natural environment are conserved and enhanced. These criteria include reference to protecting and enhancing local distinctiveness, sense of place and tranquillity by applying the principles of set out in the Landscape Character Assessment. Development proposals are also required to protect and enhance natural features which contribute to the distinctive character of the District's landscape, such as trees, woodlands, hedgerows, soils and open areas. There is a requirement that development proposals incorporate appropriate new planting to enhance the landscape setting of new development using native species and which enhance biodiversity. **CP21 Biodiversity**	The policies listed by EHDC have been taken into consideration by the Applicant in the development of the Proposed Development. The Applicant has provided a comprehensive review of National and Local Plan policiespolicies in the Planning Statement submitted in November 2019 (APP-108.).

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	New development is required to maintain, enhance and protect the District's biodiversity. New development is required to ensure wildlife enhancements are incorporated into the design to achieve a net gain in biodiversity and ensuring any adverse impacts are avoided or appropriately mitigated for. **CP26 Water resources / water quality** The part of the scheme within the EHDC area is a Groundwater Source Protection Zone so this policy is applicable. Requires new development to protect the water quality and quantity and make efficient use of water. **CP27 Pollution** This policy states development must not result in pollution which prejudices the health and safety of communities and their environments. Development that may cause pollution will only be permitted if they are appropriately separated and designed to remove the risk of unacceptable impacts. - CP28 Green infrastructure Requires new development to maintain and enhance the network of new and existing green infrastructure and requires new green infrastructure to be provided on-site or through a financial contribution. **CP29 Design** Includes a number of design based criteria development proposals are expected to accord with, including that it makes a positive contribution to the overall appearance of the area; takes particular regard to the setting of the South Downs National Park and is sympathetic in its relationship to landscape features. **CP30 Historic environment** Requires new development to conserve and, where possible, enhance the District's historic environment. **CP31 Transport** Sets out various criteria that promote sustainable modes of transport and that highway design meets the needs of all users of the highway. The volume of traffic generated must not harm the countryside or the rural character of local roads.	
East Hampshire Local Plan Second Review		
	4 Protection of footpaths States development will not be permitted where it would adversely affect the amenity of users of footpaths. **UI1 New utility infrastructure in the countryside** Permits new utility infrastructure in the countryside if the proposal is an environmentally acceptable way of achieving the purpose of development; the amenity of nearby occupiers is not harmed; measures to ameliorate the environmental impact of the development are incorporated and the traffic generated is appropriate to local roads.	The policies listed by EHDC have been taken into consideration by the Applicant in the development of the Proposed development.Development.

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3.3 Emerging East Hampshire Local Plan		
3.4	At the time of writing this LIR, the Local Plan remains at an early stage of preparation and the draft policies carry no weight. Public consultation has been carried out (Regulation 18), however, a draft plan is not expected until the end of 2021. The applicant has provided a list of the emerging policies in section 1.2.5 of Appendix 4 of the Planning Statement (Document ref: 5.4.4) and it is not intended to duplicate those here.	The status of EDHC'sEHDC's emerging Local Plan is noted. The Applicant notes that there are no Neighbourhood Plans within East Hampshire pertinent to the proposed development.
3.5	Moreover, in light of the White Paper, 'Planning for the Future' August 2020, there is further uncertainty about the progression of the Local Plan or what form it may take.	
3.6	There are no Neighbourhood Plans pertinent to the scheme within the EHDC area.	
4 Assessment of Impacts **4.1 Landscape impacts**		
4.6	The part of the site within the EHDC area comprises an agricultural field, enclosed to the north by trees and a copse that screen the Lovedean Electricity Sub-station. Whilst the sub-station is generally well-screened in the landscape, in terms of scale and associated pylons, it is nevertheless a significant feature within the landscape. The site is generally flat and occupies an elevated position. To the south there are expansive views and the landscape is generally open and, despite the proximity of urban areas to the south, there is a strong rural character.	The Applicant acknowledges that the substation is generally well-screened in summer but would add that it is partially visible in winter. However, the major part of the visual effect of the substation arises from the overhead line terminal towers some of which are over three times the height of the substation and are of an undisguised and industrial nature. As referred to at point 2.2 above, the rural character is compromised by these dominant elements. The Applicant notes that, in terms of topography, the site is gently undulating and the change in gradient has been used to partially screen the Converter Station from some angles.
4.7	The development would impact on the landscape of East Hampshire and this will be broken into two parts. Firstly, the impact of the proposed track and access arrangements that falls within the EHDC administrative area and secondly, the impact of the converter station insofar as it impacts on the landscape setting of the area.	The impacts of the access track and access arrangements, and the presence of the Converter Station in terms of intervisibility on LCA 3f Downland Mosaic are assessed to be of moderate adverse significance in year 0 decreasing to minor adverse and not significant by year 10.
4.8	The proposed access from Broadway Lane would result in the removal of a section of hedgerow and sections of hedgerow where access would be formed between Day Lane and Broadway Lane. The impact of forming an entrance on the western side of Broadway Lane would be the loss of a section of hedgerow that forms a linear feature of the landscape; the impact of this in isolation may be regarded as not having a significant adverse effect on the integrity of the hedgerow with appropriate mitigation planting, however, the impact would be accentuated by the replication of access between Broadway Lane and Day Lane, resulting in two further sections of hedgerow being removed. Cumulatively, these gaps formed in the	The Applicant notes this response and is in discussions with EHDC over the proposed entranceway and landcape mitigation measures around Broadway Lane / Day Lane

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	hedgerows and the associated tracks, break up the continuity of the hedgerows as linear landscape features and appears over engineered.	
4.9	The track from Broadway Lane dissects the field between Broadway Cottages and the public footpath to the south and the trees and substation to the north. It does not follow any existing landscape features and would be an exposed and isolated feature. Hedgerow planting either side of the track would mitigate the impacts, but nevertheless, the position of the track would be a negative change to the local landscape as it does not relate to existing landscape features.	The Applicant refers to the Applicant's Response to Relevant Representations RR-162 (REP1-160) submitted at Deadline 1. The location and alignment of the access track is substantially determined by the engineering requirements of bringing abnormal indivisible loads into the site, whilst avoiding the belt of ancient woodland directly south of the Converter Station, set back from PRoW along the south of the site and set back from Broadway Cottages. This has provided the opportunity to introduce new hedgerows to improve ecological connectivity, and create smaller fields which imitate those to the west of Stoneacre Copse. A summary of the construction and operational stage impacts in respect of the access track can be found at paragraphs 15.8.3.6 and 15.8.4.14 of Chapter 15 of the the ES (APP-130). Whilst significant impacts are identified during the construction stage, by Year 10 of the operational stage, the surfacing and planting would have softened the access road both west and east of Broadway Lane and the entranceway, resulting in a minor adverse localised (not significant) effect.
4.10	As outlined in the above appraisal of the sites' context, the Lovedean Substation and associated pylons in the area are prominent infrastructure features of the local landscape. Nevertheless, the local landscape is predominantly rural in character with a landscape character consistent with the landscape character assessments referred to above. Into this landscape, the Converter Station would impose a significant building(s) of a utilitarian form that are out of keeping in scale and form to this rural setting.	The Applicant refers to the Applicant's Response to Relevant Representations RR-049 162 (REP1-160) submitted at Deadline 1. The scale and form of the buildings, of necessity, reflect their function, however the Applicant rebuts the suggestion that they are 'utilitarian'. They have been carefully designed to be of interest where they are visible at closer range, whilst being visually recessive when viewed from further afield. Appendix 1 Converter Station Design Approach (MG1.1.3) (REP1-092) is relevant to explaining the design approach to the Converter Station alongside the updated Design and Access Statement (REP1-031) submitted for Deadline 1 and supporting design principles within the document. The ES acknowledges that there will be some significant landscape and visual impacts local to the Converter Station, some of which cannot be fully mitigated. However, as acknowledged by NPS EN-1, virtually all nationally significant energy projects will have an effect on landscape.
4.11	In terms of site selection, options A, B, C and D (Plate 3.3 Design and Access Statement) were discussed with the Applicant and EHDC concurs that Option B (subject of this DCO) is the preferred option as the others are more isolated/exposed in the landscape, whereas option B is located in close proximity to the Substation and Crabdens Copse offers some established screening. There remain, however, some reservations that the initial siting exercise was limited to a 2km radius of Lovedean Substation. The reasons for this are understood (transmission losses along HVAC cables, wider cable easements etc) however, given the rural setting and the proximity of the South Downs National Park, there is concern that the setting of this designated landscape has not weighed appropriately in that process.	The Applicant refers to the updated Design and Access Statement (REP1-031) submitted at Deadline 1 which provides at section 3 further details on site context and selection. In addition, the Applicant refers tothe Alternatives Chapter (APP-117) and Supplementary Alternatives Chapter Addendum – Appendix 3 – Supplementary Alternatives Chapter (REP1-152) submitted at Deadline 1 which set out further information. The Applicant also refers to the response to ExA WQ MG.1.1.1 (REP1-091) regarding the requirement for the 2km search area.

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	EHDC supports the comments of the South Downs National Park Authority regarding the National Grid's duties under section 62 of the Environment Act 1995 and are not aware of any further information demonstrating that that duty has been met.	The Applicant confirms that, as is required in accordance with policy 5.9.12 of NPS EN-1, the Applicant had regard to the purposes of the National Park when considering the alternatives, and when designing the Converter Station Area in this location, taking into account the the various operational and other relevant constraints. This is evidenced in relation to the assessment of alternatives carried out by the Applicant, the significant work that has gone into designing the mitigation planting and the extent to which information provided by National Gridon the cut and fill was used in the selection of the connection point. The sloping landscape to was taken into account bythe Applicant in its assessmentof the alternatives design for the Converter Station buildings in so far as is possible, noting their form and mass is dictated by their function.
4.12	In an endeavour to seek assurances over the design of the Converter Station and to engage with the applicant over the parameters and design quality to mitigate its impact in the landscape, a number of design meetings were held (set out in the Design and Access Statement). Notwithstanding final design details and particularly the colour scheme for cladding of the buildings, these have been beneficial in fleshing out the impacts of the development in this location.	Noted and agreed. The Applicant refers to the Applicant's Response to Relevant Representations RR-162 (REP1-160) submitted at Deadline 1. Design group meetings between the Applicant, South Downs National Park Authority (SDNPA), Winchester City Council (WCC) and EHDC resumed in August 2020 to progress discussions on the proposed colour scheme. The Applicant agrees that it is necessary for a colour palette to be agreed at this stage so that sufficient clarity is included for how the detailed design will be progressed and this matter will not be left unresolved until post consent, which would not be appropriate as this can be determined now. Further work is being undertaken to progress discussions for the next design team meeting.
4.13	In views within the immediate East Hampshire area, the buildings would be visible from sections of Broadway Lane to the south-east and north-east, public footpath running east-west to the south of the Substation and a section of the Monarchs Way long distance footpath to the north-east.	The Applicant refers to ES Chapter 15 Landscape and Visual Amenity (APP-130). The Applicant refers to the Applicant's Response to Relevant Representations RR-049 (REP1-160) submitted at Deadline 1 which acknowledges that "Significant adverse visual effects would be experienced by some residents within a 1.2 km radius and there would be localised effects on users of the Monarch's Way, some users of PRoWs, Horndean Technology College cycle route and Broadway Lane (south), Broadway Lane (east) and Day Lane within a 3 km radius. Effects would reduce over time, remain unchanged or alter to neutral as mitigation planting matures such that by 20 years from completion significant effects would only be experienced by some residential receptors in the immediate vicinity of the Converter Station." Further details are covered under points 4.14 and 4.15 below.
4.14	During the construction period, visual impacts will be most significant in views from Broadway Lane and the public footpath to the south as well as from private properties on Broadway Lane. Although temporary and short term, the impacts would be significant adverse impact from the current visual amenity of the area and the degree of tranquillity in the landscape. The appearance of security/construction fencing, compounds, plant, vehicles ,welfare/office facilities etc would result in a significant change in the appearance of the area. The visual impacts would be localised however and more minor when viewed from receptor points in the wider EHDC area when the site appears a smaller part of the wider landscape and noting vegetation, topography or existing development. Nevertheless, the impact on recreational	The Applicant refers to ES Chapter 15 Landscape and Visual Amenity (APP-130) and SoCG with EHDC paragraph 4.3.5a (REP1-120). As stated in Table 15.11 of the ES Chapter 15, effects would be of moderate-major adverse significance for residents of Receptors No 17 and 18 and moderate to minor- moderate adverse significance for users of PRoW DC 16/ HC04 and PRoW DC19/HC28 respectively during construction. However, the effects on Receptor No 17 and on the two PRoW would fall to non-significant over time as the mitigation planting matures.

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	users of the footpath west from Broadway Cottages and the immediate area west of the site on Broadway Lane, would be highly visually intrusive in this landscape.	
4.15	During the operational stage, the most notable views of the Converter Station from within the EHDC area would be similar to those identified above. Roadside vegetation on Broadway Lane together with intervening trees, development or topography would act to screen the majority of the built form of the Converter Station. mitigating planting to infill gaps/weak sections of roadside hedging would take time to mature and take effect, but would further ameliorate views. From the south-east, Crabdens Copse provides established screening and is reasonably dense, however during winter months, views of the building would be more apparent and more so from the public footpath south of the Substation where there is no other intervening vegetation to obscure views. From here, the access track would appear a visually arbitrary landscape feature, unrelated to established landscape features. There would be some improvements however as a result of the landscaping to form the calcareous grassland and mitigating planting/hedgerow features.	The Applicant refers to Table 15.11 of the ES Chapter 15 (APP-130) which states that effects would be of moderate-major adverse significance for immediate residents of No 17 and 18 in year 1. By year 10 effects would reduce to not significant for users of PRoW DC 16/ HC04 and by year 20 for residents of No 17 and users of PRoW DC19/HC28. Residents of No 18 would continue to experience a significant effect. As referred to in Point 4.9 above, the location and alignment of the access track is substantially determined by the engineering requirements of bringing abnormal indivisible loads into the site, whilst avoiding the belt of ancient woodland directly south of the Converter Station, set back from PRoW along the south of the site and set back from Broadway Cottages. This has provided the opportunity to introduce new hedgerows to improve ecological connectivity and creation of smaller fields which imitate those to the west of Stoneacre Copse. As referred to in the Applicant's Response to Relevant Representations RR-162 (REP1-160) submitted at Deadline 1 aside from hedgerow trees and hedgerows to reduce the visual prominence of the access track from local public vantage points, the nature of the permanent surface of the road and landscaping will be agreed as part of the detailed design approvals, maintaining some flexibility at the current stage to integrate it into its immediate surroundings. Alternative options to the siting of Access Road were explored (paragraphs 2.6.5.8 -2.6.5.13 of Chapter 2 (Consideration of Alternatives) (APP-117) in this regard. However, due to the size of the vehicles required during construction and (occasional) replacement of equipment during operation access across Broadway Lane just north of Broadway Cottages is considered the most appropriate solution.
4.16	From a section of the Monarchs Way long-distance footpath to the northeast, there would be views of the Converter Station buildings. Such views would be transient but visually intrusive in this rural landscape. It would be seen in combination with pylons, resulting in a combination effect of infrastructure/industrial forms of development in the countryside, but at a distance of approximately 600m with some intervening tree/hedge cover means the degree of harm to the experience of walking the footpath would be moderated.	The Applicant refers to the Applicant's Response to Relevant Representations RR-162 (REP1-160) submitted at Deadline 1 and point 4.13 above. As referred to above, the indicative landscape mitigation plans Figure 15.48 and 15.49 (REP1-036 and 037 respectively) Option B(i) and indicative landscape mitigation plans for Option B(ii) (REP1-137) submitted for Deadline 1 seek to mitigate the visual impact on the Monarch's Way through the retention of existing hedgerows / hedgerow trees and new woodland planting to the north and north east of the Converter Station. The updated OLBS (REP1-034) refers to replacement planting for both existing and new planting within the Order limits to maintain a visual screening function.
4.17	It is important that the roof remains clear of plant or any visible equipment that may be visible, including from higher ground to the north to ensure the building has clean lines and not	As referred to in the Applicant's Responses to Relevant Representations (-(RR-162) (REP1-091) submitted at Deadline 1 and the Applicant's Comments to

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	cluttered that would be visually distracting and draw the eye. The number of lighting columns is considered excessive given the Converter Station would not be manned and access needed only for infrequent maintenance or emergencies.	Responses to ExA Questions (LV1.9.5) (document reference 7.4.2) submitted at Deadline 2 the Applicant confirms that there will not be any plant or machinery on the roof of the Converter Station and associated Telecommunications Bbuildings referred to in paragraph 5.3.1.5 and building design principle 8 of the updated DAS (REP1-031 and 032) submitted at Deadline 1. The maximum number of lighting columns has been included to meet operational requirements. Whilst lighting will only be used in emergency situations and for maintenance, it is absolutely required. Without this the Converter Station would not meet operational and security requirements, necessary for critical infrastructure. The impacts of these have been fully taken into account in the LVIA, being slender structures discernible from short distances. The dDCO secures "up to 40 lighting columns" – the exact number of columns will be subject to detailed design post consent and approval by the relevant discharging authority in consultation with the SDNPA.
4.18	From a landscape perspective, there is a preference for Option B(ii) as it groups the Converter Station closer to the Substation and retains a hedgerow. Decommissioning should ensure the removal of the buildings and removal of hardsurfacing and fencing etc	The Applicant refers to the Applicant's Response to Relevant Representations (RR-162) (REP1-160) submitted at Deadline 1. Option B(i) represents the worst case scenario in terms of landscape and visual effects and the Applicant agrees that from a landscape and visual perspective Option B(ii) is the more favourable option. Option B(ii) is dependent on securing the agreement of National Grid to use Plot 1-27 for the siting of part of the Converter Station.
4.19	To summarise landscape matters, the Converter Station would have a harmful impact on both the local landscape character and the visual experience of the local landscape. These impacts would be mitigated by the infrastructure already in place at the Lovedean Substation and associated pylons and also by the presence of trees and intervening hedgerows from receptors points within the EHDC area. The effect of this screening needs substantiating through further mitigating planting which would take several years to take meaningful effect.	The Applicant notes EHDC's acknowledgement that the effects would be local and mitigated by the presence of trees and hedgerows in the intervening landscape. The ES acknowledges that there will be significant landscape and visual effects local to the Converter Station, some of which cannot be fully mitigated. However, as noted in NPS EN-1 virtually all nationally significant energy projects will have an effect on landscapeand this should not be the basis for refusal when the applicant has provided reasonable mitigation. The Applicant refers to the Applicant's Response to Relevant Representations (RR-049 and 162) (REP1-160) which outlines the nature and extent of landscape and visual effects and the extent of mitigation planting, and revisions to the indicative landscape mitigation plans Figure 15.48 and 15.49 (REP1-036 and 037 respectively) Option B(i) and indicative landscape mitigation plans for Option B(ii)(REP1-137) submitted for Deadline 1 which include additional areas of planting. As referred to in the Applicant's Comments on Responses to Ex A Questions (LV1.9.35)(document reference 7.4.2) the updated OLBS recognises the need for a mix of plant stock including larger trees in specific locations to reduce the time taken for the mitigation planting to take meaningful effect.

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4.20	The Needs Benefits Report and Chapter 25 of the ES addresses the socioeconomics of the development. It correctly identifies policy CP5 of the East Hampshire Joint Core Strategy, which concerns employment and workforce skills. It states planning permission will be granted for development that improves workforce skills and employability; secures local skills and training provision and employment on significant development, particularly with regard to construction skills. For such a scale of development, we would look to enter a legal obligation to secure such measures.	As recognised in Chapter 25 of the ES, (APP-140), the construction of the Proposed Development is relatively specialised with elements of construction requiring specialist contractors. A large proportion of the total potential number of jobs created would be drawn from outside the region. Some aspects of construction can, however, be undertaken by local contractors and provide opportunities for local businesses – with the potential to generate around 90 regional jobs for the duration of the construction period. The Applicant is willing to discuss local employment matters further with the authority and the other relevant authorities, noting proposals need to be realistic in the context of the specialist workforce and opportunities that can realistically be provided.
4.21	There are not considered to be any benefits to the East Hampshire local economy during the operational stage.	The Applicant notes this response and refers to the Needs and Benefits Report (APP-115) and the Needs and Benefits Addendum (REP1-136) which outlines in chapter 4 the local and regional benefits of the Proposed Development.
4.22	During the construction phase, paragraph 25.4.3.2 & 3 of Chapter 25 of the ES state that specialist contractor workers are required and that 'the majority of employment will not be local'. It adds though that local workforce will be used where possible. Whilst understanding of the need for specialist contractors, greater endeavours should be made to source and secure local employment for at least operations where specialist work is not needed. Otherwise, there is little or no local economic benefit to the local economy during the construction phase. There would likely be some local spend from construction workers, though local convenience stores in Lovedean Lane/Milton Road are multiple-stores with low residual benefits to the local economy. Horndean may provide some accommodation for construction workers, but there is limited availability to suggest there would be any meaningful local benefit.	Noted.
4.23	Economically, there are few business or recreational or community facilities that would be harmed during the construction phase in view of the cable routing and location of the Converter Station; however, there would be negligible economic benefits to the local area/District, hence the need for a mechanism to secure local training/construction jobs. The local area, would, however, suffer significantly socially from disturbance during the construction phase.	The Applicant refers to the Needs and Benefits Report (APP-115) and the Needs and Benefits addendum (REP1-136) submitted at Deadline 1 which provides further information in relation to these matters. The Applicant's reponse to RR – 052 (Socio-economic/ Needs and Benefits) REP1-160 provides further detail on this matter. Section 25.9.2.1 of Chapter 25 (Socio-economics) of the ES (APP- 140) sets out measures, where possible, to maximise the potential for the workforce and supply chain to be sourced locally. These measures include working with local people and businesses, engaging with the Jobcentre Plus, and upskilling through experience and training and are included in section 5.12.1 and 5.12.2 of the OOCEMP (REP1-087) and secured as part of Requirement 15 of the dDCO. (REP1-021).
4.24	EHDC defer to Hampshire County Highway Authority on highway matters resulting from traffic during the construction phase. But there would also be a social impact arising in terms of noise, disruption, pollution and fear/perceptions arising from the additional traffic generation. The areas within the EHDC area critically effected are residential properties on Boundary	The Applicant notes the response on social impacts and refers to the Outline Onshore Construction Environment Management Plan (REP1-087). With regard to the properties affected the Applicant refers to Appendix 1 of the updated Framework Traffic Management Strategy (REP1-068), which states in paragraph

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	Lane, Day Lane, Lovedean Lane. In this regard the contents of the Framework Traffic Management Strategy (FTMS) and the Construction Traffic Management Plan are noted and read in conjunction with Chapters 22, 23 and 24 of the ES.	5.7.1.1 that within section 1 and 2 of the Onshore Cable Corridor, access arrangements to residential properties and businesses or public car parking will not be impacted by construction of the Onshore Cable Route. With respect to construction traffic noise, the predicted impacts are presented in section 24.6.13 of the ES (APP-139), and in summary, the roads listed are expected to experience negligible (not significant) effects.
4.25	The Community Strategy (2.8 of the FTMS) is important in raising awareness and good communication with affected residents/communities and also to minimise demands on the Council's monitoring and enforcement team. The construction phase is anticipated at three years and Lovedean would see not just construction traffic associated with the Converter Station, but work parties heading out to sections of the cable route. This is a not insignificant period of time where residents would be subject to construction traffic, with traffic likely arriving from 7am to start-up in advance of works commencing from 8am. The Council has resolved to grant outline planning permission for a development of 56 dwellings on land west of Lovedean Lane (ref: 54139/001), which would likely result in significant cumulative impacts on residents of Lovedean Lane..	The Applicant notes the response in relation to the Community Strategy and refers to Appendix 1 of the updated Framework Traffic Management Strategy (REP1-068) which provides in section 9 a working plan outlining how the Applicant seeks to communicate with local residents/ business and stakeholder groups, prior to the start of construction and throughout the various phases of construction. With respect to the cumulative impacts of the committed development at the land west of Lovedean Lane, this development was not included in the committed development sites included as a specific site in the SRTM run as set out in Appendix 22.5 of the Environmental Statement (APP-453) since it is not of a sufficient size to require specific assessment.). However, given the limited size of the committed development and land it is considered that any vehicular trips generated by its implementation would be accounted for in the background traffic growth included in the SRTM modelling, details of which can be found in Section 1.10.2. of the Transport Assessment (TA) (APP-448). Therefore, the Applicant's assessment of the transport effects on Lovedean Lane has taken account of this scheme.
Summary		
4.26	There remains some concern at the lack of evidence regarding the consideration of the South Downs National Park in the selection of Lovedean as the location for the Converter Station. The buildings would impact harmfully on the rural landscape character and harm the visual amenity of the local area, although it is recognised that existing infrastructure and mitigating planting (existing and proposed) would mitigate the impact in both character and visual terms.	Selection of Lovedean is addressed above in response to paragraph 4.11. The Applicant refers to the updated Design and Access Statement (REP1-031) which provides at section 3 further details on site context and selection and ES Addendum – Appendix 3 – Supplementary Alternatives Chapter (REP1-152) submitted at Deadline 1. The Applicant refers EHDC to the Applicant's Response to Relevant Representations (REP1-160) in terms of impacts on landscape character and visual amenity submitted at Deadline 1.

12. APPLICANT'S COMMENTS ON HAVANT BOROUGH COUNCIL LIR

12.1. INTRODUCTION

12.1.1.1. This section of the document contains the Applicants response to HBC's LIR (REP1-169).

12.1.1.2. The Applicant has structured their response in line with the LIR submitted by HBC.

12.1.1.3. The Applicant has provided responses to points where it is considered this will assist the ExA in considering the point raised in the LIR.

13. COMMENTS ON HAVANT BOROUGH COUNCIL LOCAL IMPACT REPORT

13.1. APPLICANT'S COMMENTS ON LOCAL IMPACT REPORT

Table 13.1 - Applicant's Comments on Havant Borough Council Local Impact Report

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Introduction		
1-3	Introductory section setting out the purpouse of the LIR and outlining Havant Borough Council's (HBC) position as an "interested party", noting that Hampshire County Council (HCC) operate a two-tier local government system and therefore are responsible for the provision of highways and is also the minerals and waste planning authority. HBC acknowledges that the Applicant has been in discussions with the Council and a Statement of Common Ground (SoCG) is being progressed. Whilst the LIR has been prepared to provide a general overview of the key impacts with HBC, more detailed can be found within the SoCG. The LIR is to be read alongside other LIR's produced with specific reference to HCC's LIR. HBC have worked closely with HCC, Portsmouth City Council (PCC) and Highways England (HE) with regard to the areas affected by the proposed Development Consent Order (DCO), in respect of the highway implactions of the application.	Comments within the introductory paragraphs of the LIR are noted.
2 Details of the proposal		
1 - 3	Section 2 provides an overview of the proposal which is to provide an electricity interconnector between France and the UK, providing a net transmission capacity of 2,000 megawatts. The LIR goes on to outline the components of the proposed development. HBC outline the element of the proposed development which falls within the administrative area of HBC relates only to cabling under the highways.	The description of the proposed development and elements that fall within the administrative area of HBC is noted.
5. Impacts: Highways and Transportation		
2	High level description of the highway characteristics - The A3 connects Portsmouth to London, albeit that A3(M) has replaced its function as part of the strategic road network on the route from Farlington to Horndean. The section affected by this DCO from Portsmouth to Waterlooville, within the administrative county of Hampshire, and borough of Havant is a largely single carriageway road with varying speed limits between 30mph and 40mph. Peak hour flows range from 1519 to 1611 vehicles per hour in the AM peak and 1285 to 1773 vehicles per hour in the PM peak. The A3 is primarily characterised by its alignment through areas of 'urban edge', providing direct frontage access to a number of individual residential properties and other uses such as shops and businesses. The carriageway widths range from 6m to 14m (including bus lanes). Bus priority measures, in the form of sections of bus	The description of the highway characteristics are noted.

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	lanes and high-quality bus stops, are a significant feature along this section of the A3 providing a high-quality bus link between Waterlooville and Porstmouth. It has a number of accesses and key junctions along it including Ladybridge Roundabout, Maurepas Way Roundabout and Hambledon Road Roundabout. The road is also a recognised diversion route if the A3(M) has to be closed for planned or emergency activities.	
3	The B2150 Hambledon Road, where it meets the A3 London Road, adjoins Waterlooville town centre and provides one of the main entrances to the West of Waterlooville urban extension. Nearby, access is also provided, via the Aston Road signal junction with the B2150, to Wellington Retail Park. The B2150 is also subject a number of direct residential and business vehicular access points and other key junctions such as the Milton Road roundabout and the Darnel Road signalised junction (providing access to the northern parcel of the West of Waterlooville urban extension). The B2150 is subject to a 30mph limit along its length from the Hambledon Road Roundabout to Forest Road Roundabout. Peak hour traffic flows along the route vary between the southern and northern end of the route with 1399 and 874 vehicles per hour respectively in the AM peak and 1474 and 907 vehicles per hour respectively in the PM peak.	The description of the highway characteristics are noted.
6	The Applicant and Highway Authority held further discussions prior to the submission of the DCO application to discuss the scoping of the Transport Assessment and the use of the Sub-Regional Transport Model. The use of the model offers the potential to understand the redistribution of traffic on the road network as a result of the temporary traffic management measures in place during the construction of the cable route. Future potential disruption to the network arising from ongoing maintenance of the cable route, and its eventual decommissioning, is expected to be appraised on a case-by-case basis.	As shown by the Scoping Note provided with the Transport Assessment (APP-448) submitted in support of the DCO Application, Hampshire County Council (HCC) had accepted the use of the Sub-Regional Transport Model (SRTM) as the means to assess the traffic implications of the introduction of the works. In terms of decommissioning activity, the traffic impacts would be the same, or lesser than as that associated with the construction of the works.The decommissioning of the Converter Station and the Onshore Cable Route would be a matter for a future consent.
9	The proposed route is already constrained to further improvement in general capacity due to the available highway land and frontages of private properties. The ongoing ability for the Highway Authority to be able to maximise the use of the highway land therefore remains paramount on this key connection to Portsmouth and the A27/M27 corridor and therefore should not be constrained by the provision of non-highway infrastructure within the Highway Boundary.	Noted. The proposed development will be no more constraining to any improvements than other existing infrastructure in the highway. The presence of Aquind assets will not have an impact on any futuredevelopments of the highway in this area.
10	The road is also subject to a significant number of private accesses which during the construction period will be subject to access issues, night-time working and additional delay along the corridor as a result of the extensive construction programme. The route also importantly provides access to key retail areas such Asda Waterlooville store, Sainsburys and Wellington Retail Park along with local centres within Purbrook and Hambledon Parade which would all be affected by the works. The western side of the northern section of A3 London Road is also the Waterlooville Major Development Area which is under construction and seen delays previously as a result of the 2008 recession. This site is providing vital housing supply for Havant Borough Council and access works and improvement works secured through the S106 for this site are programmed to conflict with the proposed	Appendix 1 of the Framework Traffic Management Strategy (FTMS) (REP1-068) is the Access to Properties and Car Parking and Communication Strategy. This document sets out the approach to be taken by the Applicant in relation to providing access to residential properties and buisnesss which are to be impacted by the construction of the Cable Route. Discussions have been held between the Applicant and Grainger Plc; the developers of the West of Waterlooville site. A draft Statement of Common Ground (SoCG) has been agreed between the Applicant and Grainger Plc (REP1-115) submitted at Deadline 1. Included within Section 4.1.3 of this SoCG is an agreed

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	construction programme for the cable laying along this corridor. Additional delays to construction of the supporting highway works and knock on implications for construction access could lead to delays in buildout of the site and therefore have a negative impact on the surrounding community as a result of increased congestion and delayed delivery of new housing supply.	statement regarding the liason which shall occur between the Applicant and Grainger Plc with reference to the phasing of highway works required to serve the West of Waterlooville development siteThe Applicant will seek to work collaboratively with HCC with regard to the delivery of the Proposed Development and the delivery of the improvement works secured by s106 contributions associated with the Waterlooville Major Development Area. It will also seek to work with the Grainger Plc of the Waterlooville site in respect of their access works such that disruption to the travelling public are minimised and efficiencies in terms of construction activities are realised.
11	Whilst the Environmental Assessment provides some consideration of an alternative non-highway focussed route, Havant Borough Council is yet to be convinced that the conclusions that the ES reached on this matter are fully justified. In particular, little understanding, and weight, appears to be given to temporal disturbance to the highway during construction, subsequent longer term impacts of this disruption and the impact on future planned highway schemes including: 1. Ladybridge Roundabout Capacity Improvements as a s106 obligation of the Waterlooville MDA planning permission and potential TCF works; 2. Stakes Road/Stakeshill Road capacity improvements as a s106 obligation of the Waterlooville MDA planning permission; 3. Milton Road/Lovedean Lane junction improvements as a result of permitted development at Woodcroft Farm secured within the s106 agreement for the development; and 4. Resurfacing works at the A3 corridor. There is also the ongoing potential for future transport works with long term aspirations to improve the bus provision along the A3 corridor to further support the bus 'Star' routes and improve the sustainable transport offer within the area.	Further justification of the route for the Onshore Cable Corridor is provided in the Supplmentary Alterantives Chapter within Appendix 3 of the ES Addendum (REP1-139) submitted at Deadline 1. The Applicant will seek to work collaboratively with HCC in order to ensure that the delivery of the Proposed Development in relation to the Transforming Cities Fund (TCF) works and the schemes referred to such that disruption to the travelling public is minimised and efficiencies in terms of construction activities are realised.
12	The Transport Assessment does not provide any justification as to why the cable must take this route, or the alternatives that have been explored and as previously noted this should be provided for clarity to all parties. There may be opportunities along the route to take the cable off the highway or at least off the main A3/B2150 corridor in either part of whole such as: 1. Fields running parallel with the A3 from B2177 Portsdown Hill Road to Purbrook Heath Road. 2. West of Waterloovile urban extension site from Purbrook Heath Road to Hambledon Road/Darnel Road junction 3. Fields on the south western boundary Hambledon Road to Forest Road roundabout.	Further justification of the route for the Onshore Cable Corridor is provided in the Supplmentary Alterantives Chapter within Appendix 3 of the ES Addendum (REP1-139) submitted at Deadline 1.

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	4. Service road provisions along the main A3 and B2150 corridor which would take the route off the mainline.	
13	These opportunities should be considered by the applicant and justification will be needed should it be considered unfeasible e.g. landscape impact. It is accepted that utilising the public highway may be considered less complicated than negotiating with individual private landowners and will likely be more contained within the existing urban landscape. However, this route will inevitably cause prolonged delay on key areas of the network and has potential ongoing implications for the Highway Authority, private developers where planning permissions rely on delivering improvements to the affected highway and other utility companies. Havant Borough Council therefore requires clear justification as to why the highway is the preferred option. This is especially pertinent for the southern section of Hambledon Road and northern end of London Road (north of Ladybridge roundabout) within the development red line given that these areas are particularly heavily trafficked and there are several planned improvement schemes, making cable installation particularly challenging.	Further justification of the route for the Onshore Cable Corridor is provided in the Supplmentary Alterantives Chapter within Appendix 3 of the ES Addendum (REP1-139). The submitted Supplementary Transport Assessment (REP1-142) has demonstrated the implications of the delivery of the works on the sections of the highway network HCC refer. The Framework Construction Traffic Management Plan (REP1-070 and 071) and Framework Traffic Management Strategy (FTMS) (REP1-068 and 069) sets out details of the mitigation approach during construction. These updated documents were all submitted at Deadline 1. The Applicant will seek to work collaboratively with HCC in order to ensure that the delivery of the Proposed Development in relation to the works referred to and the schemes referred to are delivered in a way that disruption to the travelling public is minimised and efficiencies in terms of construction activities are realised.
14	There are significant works to the highway planned in the area and the applicant will need to coordinate with these works. Some schemes may have secured funding, or planning triggers, which if delayed due to unavailable road space could have wider impacts on securing sustainable development objectives. Discussions regarding programming should be proactively held with the Highway Authority, and other stakeholders, to ensure that road space conflicts are managed effectively.	Please see the Applicant's response at Deadline 1 to the Relevant Representation made by HCC (RR-093) (REP1-160). The Applicant will seek to work collaboratively with both Havant Borough Council (HBC) and HCC in order to ensure that the delivery of the Proposed Development in relation to the works referred to is delivered in a way that disruption to the travelling public is minimised and efficiencies in terms of construction activities are realised.
15	On a general note, Havant Borough Council, together with the Highway Authority have sought confirmation during the PEIR consultation that access to individual properties along the A3 London Road would be retained during construction of the cable route. However, the Transport Assessment does not provide details regarding access to these individual properties. This information should therefore be provided, especially considering the unknown presence of those with mobility issues and likely absence of alternative appropriate on or offroad parking.	Included in Appendix 1 of the Framework Traffic Management Strategy (FTMS) (REP1-068 and 069) is the Onshore Cable Route Construction Impacts on Access to Properties and Car Parking and Communication Strategy. This addresses the the impacts of construction of the Onshore Cable Route upon parking and driveway access for residential properties, businesses and car parks located within of immediately adjacent to the Onshore Cable Corridor and sets out the proposals to manage these impacts.
16	A plan showing the highway boundary overlaying the order limit should be provided to enable a clear understanding of the highway land affected. This can be obtained from HCC's Asset Information Team assetinformation@hants.gov.uk	Where the Onshore Cable Corridor follows the public highway, the Order limits (APP-154) have been aligned with highway boundary information obtained from HCC prior to submission of the DCO application in 2019. The Applicant believes this information should be sufficient to provide the clarity required by HCC..
17	There are several planned highway works within the area, primarily as a result of the ongoing build out of the West of Waterlooville urban extension site, along with other traffic management and safety engineering programmes. This includes a significant improvement	The Applicant will seek to work collaboratively with both HBC and HCC in order to ensure that the delivery of the Proposed Development is delivered in a way that

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	scheme planned at Ladybridge Roundabout. In addition, Portsmouth Water and Southern Water are planning to create a new reservoir at Havant Thicket with significant associated construction traffic movements arising. The programme dates for these works are broadly consistent with those proposed for project subject of this proposed DCO. Consideration must be given to committed schemes and the requirements under the relevant planning permissions (and/or Local Plan allocations) for the works to be delivered within specified timescales.	disruption to the travelling public is minimised and efficiencies in terms of construction activities are realised. Please see the Applicant's response to Relevant Representation made by HCC (RR-093) (REP1-160).
18	The proposed development must be coordinated with the other planned works on the network in order to avoid undue disruption for users of the network, and to ensure that the planning requirements of local developments are complied with. There is an increasing importance being placed at a national and local level on improving the operation of the local road network and reducing congestion, thereby improving air quality and supporting non-car based sustainable modes of travel.	The mitigation measures from the OOCEMP (REP1-087 and 088) include that communication should be maintained with all major developments within 500 m of the Proposed Development in order to coordinate activities and reduce dust impacts. The overall temporary air quality impacts from traffic management during construction were assessed to be negligible in the Air Quality Assessment (Chapter 23, Table 23.116 (REP1-033)). There are no permanent air quality impacts from traffic emissions.
	Havant Borough Council require additional information in order to fully assess the application, which should be covered through a specific Transport Assessment and Construction Traffic Management Plans. Fundamentally the Highway Authority require further clarification and justification within the submitted material as to the discounting of suitable alternatives to the utilisation of the A3 and B2150 for cable laying. This is in order to demonstrate clearly that the likely prolonged delay and disruption to the general public arising from utilising this route can be considered a necessity for delivery of this project. Havant Borough Council together with the Highway Authority will require appropriate mitigation measures to offset the impacts of the development. This includes ensuring all highway users, residents, nearby development sites, future highway improvement schemes and businesses are not unduly affected by the proposed works.	Further justification of the route for the Onshore Cable Corridor is provided in the Supplmentary Alterantives Chapter within Appendix 3 of the ES Addendum (REP1-139) submitted at Deadline 1.
6. Impact on amenity of area		
1	The A3 and Hambledon Road have a significant number of both residential properties and business, as such the impact on these proprieties and business needs to be fully considered. The submitted Environmental Statement and Onshore Outline Construction Environmental Management Plan provides a helpful starting point for considering matters relating to noise, vibration, air quality and socioeconomic matters. HBC are in dialogue with the applicant regarding these matters and progress is being made, although areas of clarification are required.	The Applicant has prepared a specific document dealing with access to properties and businesses during construction of the Proposed Development. The Access to Properties Note is provided at Appendix 1 of the Framework Construction Traffic Management Plan (REP1-068 and 069). The Access to Properties Note includes location-specific assessments of the expected impacts on properties and car parking; as well as details of mitigation measures; and the methods of communication with local residents, businesses and other stakeholders in the areas directly affected during the construction period.

Para No.	Local Impact Report Statement	Applicant's Response
2	HBC are content with the approach and methodology used for undertaking construction and noise assessments. However, with regards to ES tables 24.4 and 24.6 (APP-139) additional clarity is required, in particular to confirm what a period is, and also, we would agree that the approach currently in place could lead to some receptors "experience" being underrepresented, because there are "breaks" in between noisy periods. HBC will be asking for clarity on this matter from the applicant.	The term 'period' in table 24.4 and 24.6 of the ES Addendum (APP-139) refers to a either day, evening/weekend or night. The reason for using the word period is that all three time periods are presented in the table. Please refer to Paragraph 17.3.2.3 of the ES Addendum (REP1-139) for an explanation of the use consecutive periods in the 2019 ES. The optionality for successive (consecutive) or non-successive (non-consecutive) installation of the two cable circuits has been accounted for in the revised construction noise assessment contained in section 17.3 of the ES Addendum. As there is the potential for successive (i.e. one after the other) installation of both cable circuits, the revised assessment has, by dentition, considered the total duration that any individual receptor would be exposed to adverse effects from a construction activity such as cable duct installation. As explained in Paragraph 17.3.2.4 of the ES Addendum, as successive or non-successive cable circuit installation will not alter the total duration that any receptor is exposed to a given noise or vibration impact, the programme of works adopted (successive or non-successive installation of each circuit) will not alter the conclusions of the noise and vibration assessment.
3	The definitions of magnitude of impact to the noise environment as set out in Table 24.13 of the ES (REP1-139) further clarity is required and this might lead to a requirement for the assessment to be rerun. HBC will be asking for clarity on this matter from the applicant	This question was raised by the Examining Authority and the Applicant provided a response at Deadline 1. Please refer to the response to question N1.11.7 in the Applicants Response to Written Questions (ExQ1) (REP1-091).
7. Conclusion		
1 - 2	Havant Borough Council notes the potential benefits that could arise from the proposed development, including the potential for improved resilience of energy supply for the United Kingdom and France, increased competition within the energy market and the scope to continue to reduce the reliance on non-renewable/carbon-intensive sources of energy supply. However, the LIR raises a number of concerns as outlined in the LIR with regard to impact on the highway network, whether alternative locations for the cabling have been adequately considered and the impact on the amenity of the area.	The concluding points in the LIR are noted. Please refer to the Applicant's response to Sections 5 and 6 for further details.