

From: SCornwell@winchester.gov.uk
To: [Aquind Interconnector](#)
Subject: Aquind Interconnector:
Date: 20 October 2020 15:18:16
Attachments: [WCC submission incl dDCO.pdf](#)

Your Ref reference EN020022

WCC identification No 20025191

**Aquind Interconnector Nationally
Significant Infrastructure Project Examination: Deadline 2**

Dear Sir,

Please find enclosed the response by Winchester City Council to
Deadline 2.

If you have any questions please do not hesitate to contact me.

Regards

Steve Cornwell
Lead Officer Aquind Interconnector

Winchester City Council
Colebrook Street
Winchester, SO23 9LJ

Tel:

Ext:



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Aquind Interconnector

Your Ref reference EN020022

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Deadline 2 response from Winchester City Council

Context.

Winchester City Council (the Council) is currently engaged with the applicant in a range of discussions on some of the core issues relating to the proposal.

Within the time available since the Deadline 1 submissions were published, the Council has not found it possible to review all the documents submitted by the applicant. The focus has therefore been on those documents that relate to matters not currently under discussion and the dDCO. Regarding the outstanding matters of Biodiversity, Air Quality and Noise, the Council expects to be in a position to formally respond to the latest submissions by Deadline 3 at the latest.

The following documents have been reviewed with comments:

- Design and Access Statement Revision 002
- Applicants response to the Ex Authority first set of Questions
- Statement in Relation to the FOC (fibre optic cable)
- Position Statement in relation to the Refinement of the Order Limits
- Position Statement on Planning Obligations in connection with Proposed Development
- ES Addendum Appendix 3 Supplementary Alternatives Chapter
- Draft Development Consent Order (6 October 2020 edition)

5.5 Design and Access Statement Revision 002 (REP1-032)

The Council notes the record of the Design Group meeting in section 4.3 and accepts the broad interpretation of the discussions. It is noted there have been more recent meetings that are not referred to

Section 5.2.3.14 contains further information on the lightning masts. There will be two types. The first 4m tall located on the top of the tallest building. The second type will be free standing 26-30m tall located in the switchyard within the compound. Plate 5.8 appears to show these as lattice towers. Whether they are triangular or square towers is not clear.

Considering the nature of these structures, the visualisation photos and assessment needs reviewing.

Section 5.2.4.3 indicates there are two design options that will influence whether the roof is at 22 or 26m in height. The Council wishes to see why the lower of the two cannot be committed to rather than leaving the final decision up to a contractor?

Section 5.7.2.3 refers to the choice of autumnal palette colours for the buildings. This is not yet agreed by the Council and is the subject of ongoing discussions.

Section 6 contains the groups of “principles” including those for the building and landscaping. Regarding the set for the building there is no agreement as yet on no. 3 colour range. Number 7 is rather vague on the height issue of the masts and no.9 needs checking before the Council signs up to it.

Concerning the landscape principles, the Council wishes to see “enhancement” added to number 7 as one of the objectives of the landscaping scheme.

7.4.1.3 Comments on Applicants response to the Ex Authority first set of Questions (REP1-091)

- MG1.1.2 The Council notes and welcomes the positive direction of the negotiations between Aquind and NGET. It considers that this matter must be resolved before the conclusion of the Examination.
- MG1.1.6 The Council noted the three reasons on the choice of the 85.1mAOD level. It has struggled to identify the thickness of the structureless chalk bed. The DAS (5.2.10.9) indicates this is quite thin at the northern end which may explain a reluctance to go deeper. A clear statement from Portsmouth Water or En Agency setting 85.1m as the lowest permissible FFL would clear up this matter. The ExAuthority is invited to ask this directly of the two parties.
- MG1.1.21 The Council notes and welcomes the clear intention to manage and retain the landscaping for the life of the Converter Station. The mechanism to accomplish this (Deed of Covenant) is still to be clarified and accepted.
- CA1.3.3 The Council notes that the FOC will not provide any revenue to support the overall project.
- LV1.9.25 The Council notes the reference to cranes of 84m in height.

It is now understood that the worst case scenario is that up to 10 cranes would be used at any one time and a maximum of two would be up to 84m in height. It is considered that the significance of construction stage effects would not change as a consequence of this information.

This needs clarifying. Is this height correct, are we talking about tower cranes with what type of reach and did they form part of visual assessment during construction phase?.

OW1.1.12.11 The Council notes that the applicant's comments that they are surmising on the hydrology at Kings Pond Meadow. Why have they not taken any cores so there is more certainty on the current situation?

TR1.17.2 The Council notes the reference to replacement tree planting 5m away from the cable route. However, it is not clear what this means. Is it the cable circuit or the edge of the cable corridor? It needs more clarification so the reference point is readily understood.

Doc 7.7.1 Statement in Relation to the FOC (fibre optic cable) REP1-127

The Council notes the proposition by Aquind within the above document that the Fibre Optic Cable is an accepted part of the proposal. The statement makes a case based on several issues:

That when the Secretary of State (SofS) agreed that the project should be considered under the NSIP regulations the FOC was part of the description and therefore the SofS has automatically accepted its status as part of the proposal and as associated development.

The Council does not accept that any reference to associated development within the description provided by the applicant, or in the S35 Direction has closed the need for closer examination of the FOC in terms of whether or not it complies with the requirements to be accepted as associated development.

The Applicant claims that whether the SofS have ruled on this matter or not, the FOC is associated development. The Council still does not consider that the applicant have provided the evidence to support this statement. The applicant cites the general framework that would need to be satisfied but does not provide clear and convincing evidence that the nature of the FOC and the associated elements meets them. Quite the reverse is true, as the FOC appears to fail each criteria listed.

The applicant acknowledges that there will be spare capacity within the FOC but fails to offer the specific numbers that will quantify this matter. The need for some back up is agreed, but it is noted that the applicant accepted that a smaller FOC could be installed to provide the necessary communications for the interconnectors to operate. The Council remains concerned that if the actual data was produced, it would show virtually all of the FOC (99%) was orientated towards commercial use.

The applicant acknowledges that two thirds of the capacity of the ORS at Eastney and both of the telecommunications buildings at Lovedean will be dedicated to the commercial use of the FOC. The Council considers that this clearly goes beyond the threshold for associated development.

The applicant has acknowledged that the FOC provides no financial support to the interconnector.

The applicant's admission that they have obtained the status of a Code Operator under the Communications Act 2003 raises the potential for them to add a subsidiary branch network of telecommunications links and apparatus using the DCO powers effectively avoiding the normal requirements to comply with the planning act.

Following the submission of this statement, the Council is becoming concerned that the ability to offer a commercial telecommunications facility to locations along the cable corridor has been a disproportionate force behind the choice of the road route for the cables.

In conclusion, the Council considers that the commercial element of the FOC should be considered in its totality. The Applicant acknowledges that the cable will be larger than it needs to be just to service the requirements of the interconnector alone. The majority of the ORS and the entirety of the Telecommunications buildings will be allocated to the commercial use. There is no need from a financial perspective for the FOC. Furthermore, the applicant may seek under its capacity as a Code Operator, to use the extensive powers granted under any DCO to install further telecommunications connections and apparatus. Finally, The Council notes the intention to allow third party access to the Telecommunication Building. The inference is that the Applicant will install the main FOC, the telecommunications network beyond the original cable with the necessary support facilities and then dispose of this element to some third party. This is considered to be an entirely commercial proposal with no clear link to the main proposal.

Whilst the questions raised by the Council in its LIR are still considered to be outstanding, the view taken from the information in the statement is considered so clear and compelling that the Ex Authority is invited to weigh up the evidence and requested to advise the applicant that the commercial aspect of the FOC should be stripped from the proposal and the FOC element restricted to one serving the Interconnector alone.

7.7.4 Position Statement in relation to the Refinement of the Order Limits REP1-133

The Council notes in 3.1.1.6 the adjustment to the land required for New Connection Work Rights at Soake Farm. However, the Council strongly objects to the retention of access rights as a haul route across this land as shown on plates 1 & 2. A section of this haul route would cross part of the SINC designation.

The Council welcomes the refinement to the Order Limit on Anmore Road as set out in 4.1 with the removal of the eastern cable route

option, providing it is perfectly clear that the TPO tree and its root system are not impacted

7.7.6 Position Statement on Planning Obligations in connection with Proposed Development REP1-135

The Council has read and noted the contents of this paper. The only comment it wishes to make is one of disappointment. The applicant is putting forward such a high test for any contribution that it is virtually impossible for one to be achieved. This application has the potential to be very profitable and it is a source of profound regret that the applicant is rejecting any request to share a relatively small element of that benefit with the local community that will accommodate the facility for nearly two generations.

7.8.13 ES Addendum Appendix 3 Supplementary Alternatives Chapter REP1-152

This additional document covers two issues that The Council has raised in its Local Impact Report (LIR).

Firstly, the degree to which the proximity of the National Park played in the decision by NGET to offer Lovedean as the connection point to the grid. Secondly, the questions around the degree to which the applicant considered a route for the cables through the countryside west of the A3 in reaching its decision to follow the A3 and B2150.

Regarding the weight given to the presence of the National Park in the choice of Lovedean, the addendum gives no clear assurance that this took place. Section 2.1.1.10 makes it quite clear that the applicant does not know the degree this issue played in the decision making by NGET.

The applicant does speculate on the factors that were likely to be under consideration between the three connection points and it is acknowledged that these do favour Lovedean. The Council's view is that the Ex Authority does need a clear audit trail on this matter. Consequently the Council would encourage the Ex Authority to issue a direct request to NGET for this information.

The secondly issue to be considered is under Section 8, the Countryside Route. The addendum sets out 5 specific considerations.

Ecological Constraints

As recognised by the applicant, the Council has sought to offer a possible route that avoids as much as possible ecological features. HDD could resolve some of the outstanding issues.

Sterilisation of Land

The claim that a Countryside Route would stop future housing development or minerals extraction is not accepted. The likelihood of this land being allocated for development is considered very remote. Even if such an option might arise then any layout could be adjusted to keep the cable corridor clear. If the applicants logic was followed, then no main gas or water pipe would be laid cross country.

The claim that the cable route would sterilise mineral deposits has been reviewed with colleagues at the Minerals and Waste Authority (HCC) and not found to hold substance.

Need to Acquire Rights over Land

The Council does not accept the applicant's use of the CPO guidance document as supporting the highway option for the cable route. When it talks of alternatives, it is considered this relates to trying to seek a resolution by negotiation to buy land or interests and not support to move the route to the line of least resistance.

Impact on Watercourses

The Councils notes the issues but also the fact these are capable of resolution.

Conclusion

The first and principle observation by the Council is that this addendum is completely devoid of any timeline that sets the consideration of the Countryside Route within the optioneering process undertaken by the applicant when they decided on the preferred cable route between Eastney and Lovedean. On the basis that the only cable routes under review in this addendum are those put forward by HBC and WCC and that all 5 considerations have the intention of directly addressing issues raised by the councils routes, Winchester City Council is drawn to the only conclusion that the applicant did not consider the Countryside Option in any meaningful way prior to it being raised by the two councils in April 2019.

Finally, within the most recent submission by Aquind (REP1-127) Statement in Relation to FOC they are now saying they will act as a Telecommunications Code Operator which gives them powers to run and install telecommunications equipment. The statement talks of them installing branches off the main route. Such an opportunity would not be possible if the cable went cross country as the main opportunities for further telecommunications installations would only really exist if the cable took the road route. This raises the question of the degree to which the potential commercial opportunities associated with the telecom element of the scheme have been a significant driver in the choice of the road route and conversely, resistance to the countryside route.

Comments by Winchester City Council on Draft Development Consent Order 6 October 2020 edition

The following is an amalgamation of the Councils original comments from the Local Impact Report (LIR) and further comments on the Applicants deadline 1 revised dDCO. The Council reserves the ability to comment further as discussions progress.

Part 1

General Provisions preliminary

(the following extracts are just copied for later use)

2 Interpretations

commence” means (a) in relation to any works seaward of MHWS, the first carrying out of any licensed marine activity authorised by the deemed marine licence save for preconstruction surveys approved by the deemed marine licence and (b) in respect of any other works comprised in the authorised development beginning to carry out any material operation, as defined in section 155 of the 2008 Act (when development begins), forming part, or carried out for the purposes, of the authorised development other than operations consisting of **onshore site preparation works** and the words “commencement” and “commenced” are to be construed accordingly;

“**onshore site preparation works**” means:

- (c) pre-construction archaeological investigations;
- (d) environmental surveys and monitoring;
- (e) site clearance;
- (f) removal of hedgerows, trees and shrubs;
- (g) investigations for the purpose of assessing ground conditions;
- (h) diversion or laying of services;
- (i) remedial work in respect of any contamination or adverse ground conditions;

- (j) receipt and erection of construction plant and equipment;
- (k) creation of site accesses;

- (l) the temporary display of site notices and advertisements; and
- (m) erection of temporary buildings, structures or enclosures,

Part 2

Principle Powers

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.

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).

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.

Part 3

Streets

Access to works

- 14(2) This clause sets 20 working days as the turnaround time for any request to a relevant planning authority (which is defined as the district councils) for an access not shown on the plans. This is too short a time for WCC to deal with any submission taking into account that WCC would wish to consult HCC and a number of internal consultees as part of the process.

A period of 40 working days is suggested which harmonises with the processing time to be allocated to requirement submissions.

It is noted that the 20 day period occurs elsewhere (para 16) so a common approach is needed.

18 **Protective work to buildings**

It is noted that this power only applies to works to buildings that are located within the Order limit 18(1). If the application is seeking consent that could result in development anywhere within the order limits which could be very close to the edge of the Order Limit, where is the protection for buildings outside the Order Limit but which lie very close to the actual work area?

Part 7

Miscellaneous and general

41 **Felling or lopping of trees and removal of hedgerows**

This would allow unrestrained rights to lop chop cut etc without any involvement of the local planning authority. The applicant needs to justify why such a wide ranging power is sought.

The ability to work close to trees or hedgerows is influenced by the size of machinery and a smaller digger or digging by hand could avoid the need to cut trees or remove hedgerows. More survey work should be carried out now to identify the cable circuit routes. Even in unexpected situations, details should be submitted to and agreed with the LPA before any tree work or hedge removal is undertaken.

42 **Trees subject to TPOs**

This clause gives the same wide ranging powers as 41(1) above without any involvement of the LPA. The same response is offered as set out above.

Schedule 2

Requirements

General comment:

GC1 The structural problem with the wording of the requirement that resulted from the broad range of activities that are allowed to take place before "commencement" is actually triggered, has been recognised and mostly corrected, but some areas where it is not qualified still exist and need resolution.

GC2 Because the set of Requirements is trying to cover such a broad scheme they lack clarity. A commentary section briefly outlining what each Requirement is intended to achieve and the period of time it would apply

could be very useful. Apologies if that is somewhere in the submission in which case a reference in the DCO would be useful.

Interpretations

1

- (4) This originally referred to mechanical plant or solar panels being placed on top of the building. Only the reference to solar panel has been removed. This would contradict the design and access statement about no plant or solar panels on the roof. The reference to roof top items should be removed in its entirety.

This would seem to give powers to place telecommunications infrastructure on the site of on the building that could be part of the associated development issue. No potential landscape impact has been considered. It should be removed.

- (6) (a) says length measured inside from abutment to abutment....why not outside edge of walls. The measurement point chosen is inconsistent with that nominated in (c) for measuring width. The two (a) & (c) should be the same whatever that is.

(b) When measuring height now says measurement from ground level. This is still too vague. GL before or after earthworks? Why not nominate the specific AOD height.

One solution would be a requirement that sought the creation of a fixed control point in a suitable location on the site that would act as a reference point for any calculations (see additional requirements list).

- 2 Last line, should it not be..... comes into force.

2(2) says notification to LPA at least 5 working days before authorised development is commenced. Are we not back with the issue here of pre commencement work that can take place? This does not allow any protective works to be checked. Notification should be given before **any** work associated with any approved phase is undertaken.

- 3 Phases of authorised development onshore

add”within that planning authorities administrative area” so it reads

3.—(1) No authorised development landwards of MHWS including the onshore site preparation works may commence until a written scheme setting out all the phases of the authorised development has been submitted to the relevant planning authority detailing the phases of the onshore works *within that planning authorities administrative area”*.

As discussions continue, it is becoming evident that the cable route is not a homogeneous corridor, specifically the northern section from Lovedean down to Waterlooville. The division of the cable route into phases needs to be based on its character differences and not on how a contractor views it.

This requirement should also require the submission of the order/sequence in which the phases will be implemented. It seems logical that ground will be broken at the access off Broadway Lane first and then the first part of the access road and the laydown area formed.

5 Converter Station and optical regeneration station parameters

In Table WN2, the Lightning mast height is given as 30m. Understood there are also some on top of the building at 4m tall. It needs to say that the 30m masts are positioned in the yard area.

The maximum overall height of the Converter Station of 111.1m AOD should be in here somewhere.

6 Detailed Design approval

6 (1) What is Works No. 2(a)?

Works No 2 includes the access road and the new access but does not ask for details of either.

(h) refers to drainage but does Requirement 12 not covers this?

The rural section of the cable route within WCC has distinct issues not experienced elsewhere relating to how much vegetation is removed to allow the passage of cables within the DCO limits and when crossing field boundaries.

Should this requirement insofar as it relates to the design of the Converter Station building not reference back to the agreed principles in the Design and Access Statement by actually naming the source document and the relevant section?

6(1) the following should be added to the list:

- (i) details of fencing, lighting and lightning masts
- (ii) details of existing and proposed ground levels

6(2) Would it not be simpler if the Work No 3 area that covers the laydown/compound area also covered the permanent access at Lovedean and the first section of the access road that serves that laydown area? After all these elements are going to get built first?

The new Work No 3 development (access, part access road & laydown area) should be established before work begins on Work No 2 other than internal earthworks. No dirt dragged out onto highway

6(3) Seems to allow site preparation work before any details submitted so we are back with the issue over clearance work before anything is approved.

6(3)(a) should be revised to say:

(a) Proposed layout and cable circuit positions within the DCO limits.

6(7) Not happy about use of word “substantially” they are either in accordance or not. Please change.

6(7) The life expectancy of the materials is noted at 20years. Taking into account the level of consideration given to materials it seems logical for them to be retained and replaced like for like. Please add onto the end of sentence.....and shall be retained in the same materials unless the prior written approval of the local planning authority is first obtained.

7 Provision of landscaping

This Requirement should just deal with new planting work and nothing else.

Should it include seeding of areas?

7(1) The use of the words “design principles relating to landscaping” needs a clear reference back to the actual document and the section 6.2.3 within the document).

7(2) Needs a more explicit reference to planting starting in those areas not to be disturbed as soon as work commences.

7(2)(b) Should refer to native planting

7(2)(c) needs to exclude use of nitrate fertilisers

7(2)(e) this seems to cover same area of protecting vegetation as R9(4) and does not really belong here.

7(g) & (h) not sure why these are in this Requirement.

9 Biodiversity Management Plan

It is not particularly clear exactly what this requirement is supposed to cover?

Problem here with use of term “commence”.

In light of discussion on Kings Pond Meadow/Soake Meadow there is an expectation that there will need to be a very specific Requirement that

addresses the establishment of the compounds at the Meadows, the HDD operation and the reinstatement of the ground.

Any actions should achieve nitrate neutrality regarding use of fertilisers for new landscaping establishment.

Fundamentally, this Requirement is trying to do too much. Should it be split into two?

The first dealing with “Biodiversity Protection Plan During Construction Work”. As the name implies this would cover identification of those features that would be lost to development and those that will be retained together with measures to protect them. It should also define any ground that is not to be disturbed and from which any work, storage, or use by vehicles and people will be excluded. It would work alongside the CEMP.

If considered more appropriate, this Requirement could have a separate section to reflect treatment of different phases.

The second new requirement would cover “Biodiversity Retention & Management Plan during Operational Phase”

The areas this needs to cover are self-evident given the title.
Proposals/Action/ Monitoring/Review/Revision/Reporting/Changes/Action

It should refer back to the landscape design principles in the 6.2.3 of the DAS

(I do not know if there is an intention to undertake long term management elsewhere other than Lovedean)

The trigger when this plan becomes operational could be commissioning of the Converter Station. I assume that is a clearly defined action.

The Council has a concern that any screen vegetation may be considerably weakened as a result of ash dieback. Ash removal and replanting with suitable native species needs to be part of any management plan.

This requirement needs to be clearly linked to whatever mechanism is agreed upon to be used to secure long terms interest in the landscape features.

10 Highway Accesses

Is this intended to cover both permanent and temporary access points?

I am unclear if there are any other permanent accesses proposed other than at Lovedean. If not, then it makes the following even more sensible. I would suggest stripping out of here the Lovedean permanent access details which

would sit better as part of R6(2). If that's the only new permanent access being formed then could change title of this requirement to Temporary Highway Accesses. If it is not the only permanent access then the points are still work considering.

- 10(1) Too late having commencement as trigger as according to the definitions, gaps (in hedges) may already have been cleared.

Question if agreement really should rest with HCC on access arrangements. Does this not contradict clause 14 above where WCC is to agree any additional access points....question what the difference in the two sets of circumstances is?

11 Fencing

- 11(3) Need detail of fencing to be installed as it does not show up under No.6 (Detail design approval) unless it is added to 6.

12 Surface and foul water drainage

So where does this detail sit relative to that required under 6(1) (f) and (h) are they not covering same issues?

14 Archaeology

Trigger is commencement which means ground could be disturbed before any survey work undertaken.

Needs 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.

15 Construction Environmental Management Plan (CEMP)

Again a problem with use of term commence.

This requirement seems to try to protect features from harm yet again refers to commencement as trigger.

This requirement should be re worded to say "No development of any kind shall be begun"and moved right up the list to position of R4

That the following change is made

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))

17 Construction Traffic Management Plan

Again a commencement trigger issue. Pre commencement work has associated traffic movements that will be occurring before plan agreed.

R17 references back to the framework CTMP which is 8.2 in appendix 22.2 but the list of items in that document excludes any monitoring and any remedial action that might be required to correct unforeseen problems. (I have not checked revised submissions so this may have been resolved)

If these plans are prepared by different contractors (section 8.2.1.2 Appendix 22.2) who ensures they all harmonise?

18 Construction Hours

Says construction work, but does that exclude preliminary site clearance and preparation activity? They should be governed by same hours. The first section may be trying to hint in a convoluted way at this but suggest apply that restriction here in plain English.....

No reference to exclusions to protect wildlife.

Reference to “no discernible activities” is too vague and subjective.

Not clear if the start up activity all takes place at the main laydown area or allows workers to get to the main site at Lovedean and if so, would that include workers and equipment moving down the access road

The 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.

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)?

19 Traffic Management Strategy

Why is this limited only to Works No 2 What about 3 and 4?

There are aspects to the strategy that are relevant to WCC such as the timing of the work.

Wish to see absolute commitment that two way traffic flow maintained on the Hambledon Road for all sizes of vehicles (with assistance of traffic lights) plus maintenance of combined pedestrian /cycle path.

20 Control of noise during the operational period

Should set maximum noise level

How does this reconcile with exemptions claimed elsewhere in the DCO?

There are 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).

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. Especially in addition to the assumed embedded mitigation measures (section 24.6) additional mitigation measures are 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).

21 Travel Plan

Suddenly trigger is..... will be begun.....Does this include site preparation and clearance?

It seems to exclude Work No 3. There may be fewer workers on that establishment work but not clear why they are not to be covered by the Travel Plan

22 Restoration of land used temporarily for construction

What is definition of completion of authorised development?

Suggest consider using the following: “no later than first handling or transmission of any power....”

23 Control of lights during the operational period

is *exceptional circumstance* defined anywhere?

Missing Requirements

It is considered that the following aspects should form the basis of additional requirements:

- Establishment and decommissioning of Works 3: the Laydown Compound (methodology approach to constructing the temporary construction compound and then its decommissioning)
- Noise control during construction
- Controls over use of temporary earth storage area.... weed control dampening; max height? (*postscript think may now be covered*)
- Decommissioning scheme to be submitted if Converter station does not transmit any power (import or export) for period of 2 years.
- Dust mitigation strategy: dampening site generally and access road; speed control on access road; first part tarmaced up to access to laydown compound.
- It is suggested a levels control point is established on ground that is not to be disturbed and which can then be used as a base reference point for any levels that need to be taken on site.
- An Employment and Skills Plan.

End.

20 October 2020