AQUIND Limited

AQUIND INTERCONNECTOR

Applicant's Response to Local Impact Reports

The Planning Act 2008
Infrastructure Planning (Examination Procedure) Rules 2010 – Rule 8(1)©

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This document has been edited down so that after the Introduction section it only contains the comments from the applicant relating to the Winchester City Council Local Impact Report

Having reviewed the applicant's responses, the Council has decided to respond to those comment only where it is considered to help progress the Examination Process

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CONTENTS

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 WINCHESTER CITY COUNCIL LIR

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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.

NOTE: Deadline 3 comment

This document has been edited down so that it only contains the comments from the applicant relating to the Winchester City Council Local Impact Report

Having reviewed the applicant's responses, the Council has decided to respond to those comment only where it is considered to help progress the Examination Process

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	Winchester City Council Response for Deadline 3 (3 November 2020)	
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	The Council has made a detailed response to the Position paper at Deadline 2. All the Council is seeking is for the applicant to address the impacts that will fall on the local community. These are impacts that the ES readily acknowledges. Suggestions that local residents will share the benefits of potentially cheaper low carbon energy along with the rest of the South of England may be correct, but they miss the point that the local community alone will have to bear the physical impacts of the scheme which the wider south of England will not. This imbalance in the burden of impacts was recognised and was a driving force in the production of the document quoted by the Council relating to wind farms. It had been hoped that the applicant would recognise this factor and respond positively.	

Para No.	Local Impact Report Statement	Applicant's Response	Winchester City Council Response for Deadline 3 (3 November 2020)
	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.	. If the applicant approach the issue in a positive way then a legal agreement would be a perfectly legitimate mechanism to secure such remediation.

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	Winchester City Council Response for Deadline 3 (3 November 2020)

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	The Council still considers that in relation to the areas identified in the LIR the applicant is pushing the concept of the Rochdale envelope too far in certain instances. These situations are identified and in the Councils case.

Para No.	Local Impact Report Statement	Applicant's Response	Winchester City Council Response for Deadline 3 (3 November 2020)
		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	Despite some adjustment to the wording, the final decision is still left to the contractor. If the applicant has undertaken further utilities survey work in the highway as claimed, then it should be a simple matter to share that detail with everyone and refine the cable route. The Council is not suggesting that an absolute alignment is presented, simply that at the most sensitive locations the existing broad corridor is reduced to exclude impacting on the adjoining features. The continued threat to 250m of hedgerow and trees on the north side of Hambledon Road west of Soake Road cannot be justified. The applicant must be able to refine the impact to a narrower section of this frontage close to the junction.. At the detailed submission stage, a clearly reasoned written justification needs to be included on which features are to be removed and why there is no alternative. Given the importance of the landscape features identified, the presumption should be reversed and placed on retention unless a clear case can be made for removal.

		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'.	The Council has submitted a detailed response to the Supplementary Alternatives chapter at Deadline 2. For the reasons set out in that paper the applicant is not consider to have answered the questions satisfactorily and this matter still remains open

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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).	The Supplementary Alternatives Chapter lacks a clear time line setting out exactly when the applicant considered the countryside route.
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	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	Regarding the discussions with PINs it was the Councils view that the absence of the countryside route from any proposal left a hole in the consultation exercise. In the event this alternative was found to have merit then it could be a fundamental problem for the applicant at the Examination Stage.

	imposing all the dis-benefits on the local communities, road users and indeed the wider society.	the Environmental Impact Assessment Regulations, as well as considering other relevant matter such a compulsory purchase. 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	
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		

Para No.	Local Impact Report Statement	Applicant's Response	Winchester City Council Response for Deadline 3 (3 November 2020)
	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	The applicant makes general statements that the countryside route was considered but fails to identify the specific time in the optioneering process when this occurred.

		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.	Noted and accepted. Noted and welcomed providing the TPO tree and its root system are not impacted in any way. The dDCO should be amended to reflect this.

Para No.	Local Impact Report Statement	Applicant's Response	Winchester City Council Response for Deadline 3 (3 November 2020)
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)©(iv) of the dDCO (REP1-021). Please see Appendix 10 Tree Survey Schedule and Constraints Plans for refined tree retention detail (REP1-101).	Noted
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.	Noted
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	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)©(iv) of the dDCO (REP1-021). Please see Appendix 10 Tree Survey Schedule and Constraints Plans for refined tree retention detail (REP1-101).	The Arboricultural Method Statement only refer to protecting high value trees (TPO trees). This sets the bar too high and fails to consider other important factors The trees on the north side of the Hambledon Road and west of the Soake Road junction are not covered by a TPO but considered to have significant landscape value when viewed in the context of the trees on the south side of the road and their value as part of the Denmead Gap. Nothing has been seen to remove the threat to these trees

	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.	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.	The Access and Rights Plan quoted clearly indicates a new access is to be formed off Anmore Road into the land to the north The new access to Kings Pond Meadow is ref AC/2/b. Clarification required
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	Noted and closed

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 The choice of Lovedean over other possible connection points to the grid. 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.
	Conclusion 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	Winchester City Council Response for Deadline 3 (3 November 2020)
	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.	The Council has addressed the issue of the choice of Lovedean the proximity to the National Park in its response to the Supplementary Alternatives Chapter paper.
	Application Details 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.	
	Commentary 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	Winchester City Council Response for Deadline 3 (3

			November 2020)
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	The applicant's response is noted. It does raise the question what actions are proposed to mitigate the *significant* (*applicants word*) impacts on landscape character within the 1.2 km radius of the site.?

Para No.	Local Impact Report Statement	Applicant's Response	Winchester City Council Response for Deadline 3 (3 November 2020)
		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.	The Council has noted the further details relating to ground conditions and accepts the limitations on sinking the building further into the ground.
	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 Council is keen to resolve these principles so they can be locked into the dDCO.

	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	

Para No.	Local Impact Report Statement	Applicant's Response	Winchester City Council Response for Deadline 3 (3 November 2020)
	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.	The Council is seeking greater understanding of the use of this type of deed which includes a meeting with the applicant. The Council notes the clarification on the commitment to manage the landscaping for the operational life of the Converter Station. This closes that specific issue but not the more general concerns about the use of the Deed of Covenant.

	Application Details 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.	Is this correct that new planting will only take place on land that the applicant will own and only rights to management existing features will take place on other land? The Land Plans clearly show areas where New Landscape Rights are to be sought coloured green. The land to be permanently acquired is shown in pink. It is clear from the outline landscaping plan that new planting is clearly intended for green coloured areas

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	Winchester City Council Response for Deadline 3 (3 November 2020)
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.	The Council has submitted at Deadline 2 a detailed response on the FOC matter. Nothing has been added here by the applicant that needs a further response. The Council continues to hold the position as set out in its Deadline 2 submission.

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	192 glass fibres noted. It is becoming increasingly evident that the Applicant does not wish to answer the question of capacity directly. One strand of optical fibre can transmit the equivalent of 24,000 telephone calls at the same time. Are we therefore looking at a capacity that could be 192 x 24000 for each of the two circuit? That could be over 9 million lines?

Para No.	Local Impact Report Statement	Applicant's Response	Winchester City Council Response for Deadline 3 (3 Novembe
		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.	This does not answer the question of separate implementation
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	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.	The fact the applicant has sought Code Operator status would seem to indicate that they must have thought of the wider connections both locally alongside the cable route and to the wider UK network. If you are going to branch off how could you possibly offer service that does not go anywhere?

	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.		
	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	Winchester City Council Response for Deadline 3 (3 November 2020)
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	Winchester City Council Response for Deadline 3 (3 November 2020)
	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)©(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.	This comment is not understood as the original comment clearly states it does not reach the road. See comment now highlighted in bold.

	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 the applicants comments on the Council responses to ExQ1 there is reference to more survey work having been undertaken regarding services in the highway. The view prevails that a more refined corridor can be identified on Hambledon Road
	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.	Noted and closed

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	Winchester City Council Response for Deadline 3 (3 November 2020)
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.	The Council stands by its interpretation of the landscape character of the area
	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.	Noted and clarification is welcomed.
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.	The Council wishes to see this matter resolved asap and certainly before the end of the Examination, as it will help the focus of the assessment of the landscape and biodiversity impacts The Council asks if the ExA can encourage National Grid to draw the negotiations to a rapid conclusion by asking them in EXQ2 when they will be completed and any agreement signed

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*	The design group is meeting and it is the hope of the Council that the Design Principles can be established revised and agreed shortly.

Para No.	Local Impact Report Statement	Applicant's Response	Winchester City Council Response for Deadline 3 (3 November 2020)
		• *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.*	

Para No.	Local Impact Report Statement	Applicant's Response	Winchester City Council Response for Deadline 3 (3 November 2020)
		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	

Para No.	Local Impact Report Statement	Applicant's Response	Winchester City Council Response for Deadline 3 (3 November 2020)
		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.*

Para No.	Local Impact Report Statement	Applicant's Response	Winchester City Council Response for Deadline 3 (3 November 2020)
		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.	When this was first raised some time ago, the response was the applicant believed it to be a section of fencing and not a hedge. It is hard to see how this section is not as important to screening the site as those sections to the north and south along the lane.
	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.	Noted and welcomed. Does this commitment need to feature in the dDCO?
	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.	Noted we await the results of the survey. Noted

	Conclusion 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	Elsewhere in the comments to the Councils response to the ExAQ1 the applicant accepted the development will have significant effects on landscape character for a radius of 1,2km. However the mitigation is confined to well within this area. The figures are approximately as follows: 350m to the west 750m to the south and east 6550m to the north. What mitigation is being offered for the impact beyond these limits but within the 1.2km radius?

Para No.	Local Impact Report Statement	Applicant's Response	Winchester City Council Response for Deadline 3
		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.	

Para No.	Local Impact Report Statement	Applicant's Response	Winchester City Council Response for Deadline 3 (3 November 2020)
		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).	

Para No.	Local Impact Report Statement	Applicant's Response	Winchester City Council Response for Deadline 3 (3 Novem 2020)
	(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.	The Council welcomes this offer and will engage positively with the applicant to conclude an agreement.
APPENDIX N Landscape Comments			
	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	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	

	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?	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,	

Para No.	Local Impact Report Statement	Applicant's Response	Winchester City Council Response for Deadline 3 (3 November 2020)
	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	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	

	illustrative at the moment) bears little relationship to this analysis.	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.	

Para No.	Local Impact Report Statement	Applicant's Response	Winchester City Council Response for Deadline 3 (3 November 2020)
	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	Winchester City Council Response for Deadline 3 (3 November 2020)
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.	Whilst noting the movement, the Council still wishes to see A reduction in the broad corridor on the Hambledon Road where the route enters Soak Meadows.

	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)©(iv) of the dDCO (REP1-021). Please see Appendix 10 Tree Survey Schedule and Constraints Plans for refined tree retention detail (REP1- 101).	Noted

Para No.	Local Impact Report Statement	Applicant's Response	Winchester City Council Response for Deadline 3 (3 November 2020)
	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.	Noted
	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.	The Council still wishes to see a reduction in the broad corridor on the Hambledon Road where the route enters Soak Meadows.

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).

Para No.	Local Impact Report Statement	Applicant's Response	Winchester City Council Response for Deadline 3 (3 November 2020)
	<u>Lovedean</br></br>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.</br></br>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.	The additional/reinforcement planting suggested by the Council is still viewed as having merit for the reasons previously stated. Action at both locations is the Councils preferred response but if forced to express a preference, PH-2 is the logical choice as it represents the stronger east –west link to be enhanced in preference to PW-5.
	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.</br></br>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.</br></br>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.	I think the applicant is referring to EH-5 not EH-8. The Council continues to see merit in this addition even if an access needs to be left open for access purposes.</br></br>Noted and welcomed

	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)	Thickening PH-3 to form a more substantial linear feature is still regarded as holding merit for the reasons previously stated.

Para No.	Local Impact Report Statement	Applicant's Response	Winchester City Council Response for Deadline 3 (3 No 2020)
		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.	The sections in Chapter 16 recognise that the immature nature of the new planting will have a negative impact but propose no actions to mitigate for this as they claim the impacts are low or minor. There is also considered to be a negative impact on landscape as we l las biodiversity. The reinforcement was seen as a mechanism to mitigate for both impacts.
	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.	The Council hopes that this simple but effective action can be agreed
	<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).	The impact associated with the work in this location and The applicants proposed strategy are still under consideration

	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.	Noted and nolonger an issue
	Conclusion	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.	

Para No.	Local Impact Report Statement	Applicant's Response	Winchester City Council Response for Deadline 3 (3 November 2020)
	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.	The where practicable approach to avoiding tree loss is still the applicants position along the whole of the cable corridor. What is actually meant by the Cable route needs to be defined for clarity. Is it the corridor cut through a feature, the trench or the cable itself?
	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.	The Converter Station compound.
	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).	

Para No.	Local Impact Report Statement	Applicant's Response	Winchester City Council Response for Deadline 3 (3 November 2020)
	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		

Para No.	Local Impact Report Statement	Applicant's Response	Winchester City Council Response for Deadline 3 (3 November 2020)
	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).	

Para No.	Local Impact Report Statement	Applicant's Response	Winchester City Council Response for Deadline 3 (3 November 2020)
	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	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.	

	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.		
	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*	

Para No.	Local Impact Report Statement	Applicant's Response	Winchester City Council Response for Deadline 3 (3 N 2020)
		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).	

Para No.	Local Impact Report Statement	Applicant's Response	Winchester City Council Response for Deadline 3 (3 November 2020)
	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.	

Para No.	Local Impact Report Statement	Applicant's Response	Winchester City Council Response for Deadline 3 (3 November 2020)
		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	Winchester City Council Response for Deadline 3 (3 November 2020)
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).	This comment followed the community expression to support the Gap as a priority in the adopted Neighbourhood Plan

	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.	Please change "could" to "will"

Para No.	Local Impact Report Statement	Applicant's Response	Winchester City Council Response for Deadline 3 2020)
	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.	WCC did not raise the issue of Mill Rd and Martin Road in its LIR
	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.	Whilst putting forward similar sentiments to those shown On the LHS of this page the commentary outlined here was not that presented by WCC in its LIR. It is believed these sections may come from the WCC PEIR response of April 2019

	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	Winchester City Council Response for Deadline 3 (3 November 2020)
	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	Winchester City Council Response for Deadline 3
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.	If the projected life of the scheme is 40 years what guarantees are there that the energy will remain low carbon during that period?
	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. 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. 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	This response does not address the specific point made. The construction and operational stages should be kept Separate and assessed individually not as a combined Figure. The construction work leaves a residual amount of Carbon emissions and these should be mitigated by the

		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.	Applicant. The discounting of carbon emissions from construction Employee traffic does not make sense in the context of other factors that are taken into account
	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.		
	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.		
	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	Winchester City Council Response for Deadline 3 (3 November 2020)
	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.	The Council is still seeking mitigation for the residual amount of carbon.
	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	Winchester City Council Response for Deadline 3 (3 November 2020)

	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.	This response would seem to confirm the view that benefits are not clear. For the reasons set out in its original comments, the Council remains of the view that an ESP requirement should be imposed. Following previous discussions the Applicant knows what the Council is looking for but it will repeat this detail shortly.

Para No.	Local Impact Report Statement	Applicant's Response	Winchester City Council Response for Deadline 3 (3 November 2020)
	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	This is covered by the measure described above. The Applicant is willing to discuss this further with WCC.	The Council will discuss this detail with the applicant shortly.

	with education establishments whereby potential career opportunities can be highlighted to students without actual visits to the site.		
	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.	The Councils comments and position took this factor fully into account. It is considered to be the principle that is the same.
	<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	Winchester City Council Response for Deadline 3 (3 November 2020)
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	Winchester City Council Response for Deadline 3 (3 November 2020)
3.9 Mitigation			
	1. Para. 2. (1) © 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) © 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-	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	5.

	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);	post Consent. This approach is secured as part of Requirement 14 of the dDCO (APP-019).	

Para No.	Local Impact Report Statement	Applicant's Response	Winchester City Council Response for Deadline 3 (3 November 2020)
	• 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	Winchester City Council Response for Deadline 3 (3 November 2020)
	• 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.	

Para No.	Local Impact Report Statement	Applicant's Response	Winchester City Council Response for Deadline 3 (3 November 2020)
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	

Para No.	Local Impact Report Statement	Applicant's Response	Winchester City Council Response for Deadline 3 (3 November 2020)
	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	Winchester City Council Response for Deadline 3 (3 November 2020)

4.6.1	<u>Re-affirmation of Funding Statement</u> 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).	

Para No.	Local Impact Report Statement	Applicant's Response	Winchester City Council Response for Deadline 3 (3 November 2020)
	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.	The Council approach seems entirely sensible given the Circumstances. If there is some authorisation or signing off on this side of the Channel that is needed before work starts then the Council would accept a tie to that. Alternatively if the applicant wishes to identify a bond or having the necessary finances to undertake the whole scheme then these could be considered.

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

Para No.	Local Impact Report Statement	Applicant's Response	Winchester City Council Response for Deadline 3 (3 November 2020)
	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	Winchester City Council Response for Deadline 3 (3 November 2020)
	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).	The Council has a meeting with the applicant shortly that it is hoped will help clarify this matter.
	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	Given the magnitude of the documentation for this project, it is requested that the applicant provides references to the relevant documents and section they are referring to.

Para No.	Local Impact Report Statement	Applicant's Response	Winchester City Council Response for Deadline 3 (3 November 2020)
		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.	The question remains how can the applicant secure access to undertake work on features away from existing publicly accessible locations if there is any resistance by the relevant landowner.
	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	

Para No.	Local Impact Report Statement	Applicant's Response	Winchester City Council Response for Deadline 3 (3 November 2020)
	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	Winchester City Council Response for Deadline 3 (3 November 2020)
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.	This does not answer our question. Why does the applicant consider they need to exempt the development from the statutory nuisance regime if their own submitted assessments states the development will not result in a statutory nuisance occurring. This would suggest that the applicant has doubt in the conclusions of its own assessment. Implying the exemption required to ensure no "unreasonable impediment is in place" strongly implies that they consider a matter of statutory nuisance could occur (contrary to their assessment) and that such an action is unreasonable. This is not in the interest of Winchester's local residents whose normal right of redress through this regulatory regime will be prejudiced.

	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.	See Above

Para No.	Local Impact Report Statement	Applicant's Response	Winchester City Council Response for Deadline 3 (3 November 2020)
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.	Initial comment should have referred to table 5.2. If Section 1 includes the construction of the converter station building as now advised, why is this risk shown as medium when the Air quality Chapter 23 (Document 6.1.23) categorises this dust risk as high. It is particularly important to ensure suitable dust mitigation is in place during the construction phase of the converter station which is of a much longer duration than the works within the cable corridor sections

	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.	Satisfied this matter is now addressed by the updated draft DCO wording
	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	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	Satisfied this matter is now addressed by the updated draft DCO wording

	negligible. Specially in additional to the assumed embedded mitigation measures (section 24.6) additional mitigation measures are	mitigation measures ultimately used at the converter station will	

Para No.	Local Impact Report Statement	Applicant's Response	Winchester City Council Response for Deadline 3 (3 November 2020)
	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	Winchester City Council Response for Deadline 3 (3 November 2020)
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	Please share the data collected and explain why no further survey work trenches or radar was considered necessary.

		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.	See comment below
	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	The Council is pleased to see that some further work on the utilities with the road has been undertaken but it is vague exactly what this has entailed. A Desk top study or actual survey work on the ground or a combination of both? Why are the full details of this additional work and what it discovered not included in the response.? Trial pits should not have been discounted so easily. There is no substitute for locating a service exactly where it is located in the ground.

Para No.	Local Impact Report Statement	Applicant's Response	Winchester City Council Response for Deadline 3 (3 November 2020)
	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	Using the brief details provided does not allow any meaningful results in terms of the details of the schemes And what implications the work had on traffic movements