



AQUIND Limited

AQUIND INTERCONNECTOR

Statement of Common Ground Between
AQUIND Limited and Winchester City Council
Agreed Draft

The Planning Act 2008

Document Ref: 7.5.4

PINS Ref.: EN020022

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DOCUMENT: 7.5.4

DATE: 17 NOVEMBER 2020

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DOCUMENT

Document	7.5.4 Statement of Common Ground with Winchester City Council
Revision	002
Document Owner	WSP UK Limited
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Date	November 2020
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Date	November 2020

CONTENTS

1.	INTRODUCTION AND PURPOSE	1-1
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1.1.	PURPOSE OF THE STATEMENT OF COMMON GROUND	1-1
1.2.	DESCRIPTION OF THE PROPOSED DEVELOPMENT	1-1
1.3.	THIS STATEMENT OF COMMON GROUND AND THE ROLE OF WCC	1-2
2.	RECORD OF ENGAGEMENT UNDERTAKEN TO DATE	2-3
3.	SUMMARY OF TOPICS COVERED BY THE STATEMENT OF COMMON GROUND	3-9
<hr/>		
3.1.	TOPICS COVERED IN THE STATEMENT OF COMMON GROUND	3-9
4.	CURRENT POSITION	4-10
<hr/>		
4.1.	PLANNING POLICY	4-10
4.2.	NEED FOR THE PROPOSED DEVELOPMENT	4-10
4.3.	LANDSCAPE AND VISUAL AMENITY	4-12
4.4.	ONSHORE ECOLOGY (INCLUDING ARBORICULTURE)	4-16
4.5.	HERITAGE AND ARCHAEOLOGY	4-21
4.6.	TRAFFIC AND TRANSPORT	4-21
4.7.	AIR QUALITY	4-23
4.8.	NOISE AND VIBRATION	4-23
4.9.	SOCIO-ECONOMICS	4-26
4.10.	CUMULATIVE EFFECTS	4-26
4.11.	ONSHORE OUTLINE CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN	4-27
4.12.	DRAFT DEVELOPMENT CONSENT ORDER	4-28
4.13.	ALTERNATIVES	4-33
4.14.	CARBON AND CLIMATE CHANGE	4-34
4.15.	FLOOD RISK AND GROUND WATER	4-35

TABLES

Table 2-1 – Consultation with Winchester City Council	2-3
Table 4-1 – Planning Policy	4-10
Table 4-2 – Need for the Proposed Development	4-10
Table 4-3 – Landscape and Visual Amenity	4-12
Table 4-4 – Onshore Ecology (including Arboriculture)	4-16
Table 4-5 – Heritage and Archaeology	4-21
Table 4-6 – Traffic and Transport	4-21
Table 4-7 – Air Quality	4-23
Table 4-8 – Noise and Vibration	4-23
Table 4-9 – Socio-economics	4-26
Table 4-10 – Cumulative Effects	4-26
Table 4-11 – Onshore Outline Construction Environmental Management Plan	4-27
Table 4-12 – Draft Development Consent Order	4-28
Table 4-13 – Alternatives	4-33
Table 4-14 – Carbon and Climate Change	4-34
Table 4-15 – Flood Risk and Ground Water	4-35

1. INTRODUCTION AND PURPOSE

1.1. PURPOSE OF THE STATEMENT OF COMMON GROUND

- 1.1.1.1. A Statement of Common Ground ('SoCG') is a written statement produced as part of the application process for an application for a Development Consent Order ('DCO') and is prepared jointly by the applicant and another party. A SoCG sets out the matters of agreement between both parties, matters where there is not agreement and matters which are under discussion.
- 1.1.1.2. In this regard paragraph 58 of the Department for Communities and Local Government's guidance entitled "Planning Act 2008: examination of applications for development consent" (26 March 2015) hereafter referred to as DCLG Guidance describes a SoCG as follows:
"A statement of common ground is a written statement prepared jointly by the applicant and another party or parties, setting out any matters on which they agree. As well as identifying matters which are not in real dispute, it is also useful if a statement identifies those areas where agreement has not been reached. The statement should include references to show where those matters are dealt with in the written representations or other documentary evidence."
- 1.1.1.3. The aim of a SoCG is to assist the Examining Authority to manage the examination of an application for a DCO by providing an understanding of the status of matters at hand and allowing the Examining Authority to focus their questioning. The effective use of SoCG is expected to lead to a more efficient examination process.
- 1.1.1.4. A SoCG may be submitted prior to the start or during an Examination and updated as necessary or as requested during an Examination.

1.2. DESCRIPTION OF THE PROPOSED DEVELOPMENT

- 1.2.1.1. AQUIND Limited ('the Applicant') submitted an application for the AQUIND Interconnector Order (the 'Order') pursuant to Section 37 of the Planning Act 2008 (as amended) (the 'PA2008') to the Secretary of State ('SoS') on 14 November 2019 (the 'Application').
- 1.2.1.2. The Application seeks development consent for those elements of AQUIND Interconnector (the 'Project') located in the UK and the UK Marine Area (the 'Proposed Development').
- 1.2.1.3. The Project is a new 2,000 MW subsea and underground High Voltage Direct Current ('HVDC') bi-directional electric power transmission link between the South Coast of England and Normandy in France. By linking the British and French electric power grids it will make energy markets more efficient, improve security of supply and enable greater flexibility as power grids evolve to adapt to

different sources of renewable energy and changes in demand trends such as the development of electric vehicles. The Project will have the capacity to transmit up to 16,000,000 MWh of electricity per annum, which equates to approximately 5 % and 3 % of the total consumption of the UK and France respectively.

1.2.1.4. The Proposed Development includes:

- HVDC Marine Cables from the boundary of the UK Exclusive Economic Zone ('EEZ') to the UK at Eastney in Portsmouth;
- Jointing of the HVDC Marine Cables and HVDC Onshore Cables;
- HVDC onshore cables;
- A Converter Station and associated electrical and telecommunications infrastructure;
- High Voltage Alternating Current ('HVAC') Onshore Cables and associated infrastructure connecting the Converter Station to the Great Britain electrical transmission network, the National Grid, at Lovedean Substation; and
- Smaller diameter Fibre Optic Cables to be installed together with the HVDC and HVAC Cables and associated infrastructure.

1.3. THIS STATEMENT OF COMMON GROUND AND THE ROLE OF WCC

1.3.1.1. This draft SoCG has been prepared jointly by the Applicant and Winchester City Council ('WCC') to reflect the positions of of the Parties at Deadline 1. It has been prepared in accordance with the DCLG Guidance and precedent examples of SoCG available on the Planning Inspectorate's website.

1.3.1.2. WCC is interested in the Proposed Development as a Local Planning Authority ('LPA') in respect of the parts of the Proposed Development located within their administrative boundary.

1.3.1.3. WCC would be responsible for discharging some of the requirements of the Order associated with development in their administrative area should development consent be granted for the Proposed Development. WCC would also be responsible for monitoring and enforcing some of the DCO provisions and requirements.

1.3.1.4. For the purpose of this SoCG the Applicant and WCC will be jointly referred to as the 'Parties'.

1.3.1.5. Where matters are recorded as 'ongoing' the Parties will continue to progress discussions and provide a further updated draft of this SoCG in due course.

2. RECORD OF ENGAGEMENT UNDERTAKEN TO DATE

2.1.1.1. The table below sets out a summary of the key meetings and correspondence between the Parties in relation to the Proposed Development.

Table 2-1 – Consultation with Winchester City Council

Date	Form of Contact	Summary
Pre-submission		
31/08/2017	Telecon (Acoustics)	Initial discussion with Environmental Health Officer ('EHO') at WCC to introduce proposed development, discuss noise criteria and identify point of contact for future discussion.
18/07/2018	Meeting (Acoustics)	Meeting jointly with WCC and East Hampshire District Council ('EHDC') EHOs to discuss and agree methodologies for modelling and assessment of the Converter Station.
27/11/2018	Telecon (Planning and Highways, including WCC, EHDC, Havant Borough Council ('HBC'), Portsmouth City Council ('PCC') and South Downs National Park Authority ('SDNPA'))	Conference call to discuss EIA scoping exercise; consultation and DCO process; Cable routing update; Converter Station location update; land referencing exercise; points of contact with LPAs; external activity (engagement with stakeholders) for awareness of authorities.
04/12/2018	Meeting (WCC and EHDC)	Converter Station optioneering; reporting of progress toward site selection.
11/12/2018	Meeting (Planning and Highways, including WCC, EHDC, HBC, PCC and HCC)	PINS scoping update; Statement of Community Consultation ('SoCC') consultation process and questions; design optioneering and GI works /

Date	Form of Contact	Summary
		propose for Cable Routes and Converter Station location; Converter Station location update; major land owners and land referencing; Planning Performance Agreement ('PPA') progression of work packages.
08/01/2019	Telecon (WCC and EHDC)	Notification of the Applicant's decision to progress with Option B and preferred site for Converter Station location.
10/01/2019	Meeting (Planning and Highways, including WCC, EHDC, HBC, HCC and SDNPA)	Preferred Converter Station location; Preliminary Environmental Information Report ('PEIR') for forthcoming statutory consultation; update on Cable Route options; land referencing (including Land Interest Questionnaire ('LIQ')); future engagement; SoCC.
14/01/2019	Meeting (Converter Station Design Meeting – WCC, EHDC and SDNPA)	Specific focus group to progress discussion on landscape mitigation and indicative design options; discussed site constraints; 3 design options.
22/01/2019	Meeting (Planning and Highways, including WCC, EHDC, HBC, HCC, SDNPA)	PEIR and forthcoming statutory consultation / process; Cable Route options and rationale; alternatives to limit impact of Cable Route on highway.
31/01/2019	Meeting (Converter Station Design Meeting – WCC, EHDC)	Presentation of operational need, constraints to Converter Station siting; approach to consultation.
05/02/2019	Telecon (Planning and Highways, including WCC, EHDC, HBC, HCC, SDNPA)	Deposit locations for Consultation Documents; Converter Station design and level of information in PEIR.
19/02/2019	Email	WCC Archaeologist Tracy Matthews contacted to agree the rationale and scope of the Geophysical Survey.

Date	Form of Contact	Summary
01/05/2019	Email	Written Scheme of Investigation ('WSI') for Geophysical Survey approved by WCC Archaeologist.
13/06/2019	Meeting (WCC Planning)	Discussion of issues raised by WCC as part of consultation; Converter Station design, landscaping and optioneering; community fund.
17/06/2019	Meeting (Acoustics)	Meeting with WCC and EHDC EHOs to provide update on the noise assessment with particular focus on the Converter Station.
21/06/2019	Meeting (Converter Station Design Meeting – WCC, EHDC, SDNPA)	Known site constraints discussed; built form responses to consultation.
10/07/2019	Meeting (Converter Station Design Meeting – WCC, SDNPA)	Updates on progress of landscape mitigation proposals; design evolutions following consultation feedback.
13/08/2019	Meeting (WCC Planning and Ecology)	Discussion of Cable Route refinement and assessment of previous option including a countryside option; ecology update with discussion on mitigation, connectivity, survey work undertaken and importance of Denmead Meadows; Converter Station micro-siting and parameter approach; Order Limits refinements; targeted consultation; committed schemes and SoCG.
20/08/2019	Meeting (Converter Station Design Meeting – WCC, EHDC, SDNPA)	Focus on Design Principles, explored examples from other projects and discussed the important elements that needed securing in the proposed Design Principles.

Date	Form of Contact	Summary
06/09/2019	Telephone meeting with WCC Archaeologist	<p>Meeting with WCC archaeologist. Discussed results of the geophysical survey along with proposed strategy for further evaluation and mitigation.</p> <p>Discussed timing of the Stage 2 trial trenching and agreed further archaeological surveys can be carried out following a DCO being granted, and that mitigation could take the form of archaeological monitoring during construction.</p> <p>Agreed that in some areas of the Proposed Development, a programme of strip, map and sample may be more suitable, subject to results of further archaeological trial trenching agreed to be undertaken post DCO being granted.</p>
17/09/2019	Meeting	<p>Meeting with WCC Leadership and planning officers to discuss Converter Station location and design; traffic management; terrorism and security; employment and skills; legacy for the community; and landscape and biodiversity.</p>
08/10/2019	Meeting	<p>Meeting with WCC Leadership and planning officers to respond to questions raised by WCC in project team meeting on 17/09/2019.</p>
22/10/2019	Telecon (Acoustics)	<p>Discussion and agreement of octave band assessment methodology for Converter Station with Phil Tidridge (EHO at WCC).</p>
23/10/2019	Meeting (Converter Station Design Meeting – WCC, EHDC)	<p>Draft Design Principles were shared and discussed with comments noted and helping shape the Design Principles that</p>

Date	Form of Contact	Summary
		were inserted within the submitted Design and Access Statement.
24/10/2019	Meeting	Meeting with WCC Leadership and planning officers.
Post-submission		
24/01/2020	Meeting with WCC	Key application submission documents; Examination process; structure of the SoCG; PPA; key provisions in the draft DCO.
02/04/2020	Email	Draft SoCG issued to WCC by Applicant.
07/04/2020	Call with WCC Planning Officers	Discussion of structure and topics covered in the draft SoCG.
08/04/2020	Call with planning officers and EHOs from WCC and EHDC	Call to discuss noise and vibration sections in the first draft of the SoCG with regard to the Converter Station Area.
20/04/2020	Call with planning officers and EHOs from WCC, HBC, PCC	Call to discuss noise and vibration sections in the first draft of the SoCG with regard to the Onshore Cable Corridor.
02/06/2020	Email	'List of issues' received from WCC planning officers.
26/06/2020	Email	AQUIND response to 'list of issues' issued to WCC planning officers.
10/07/2020	Email	WCC responses to AQUIND responses to 'list of issues' received by AQUIND.
24/07/2020	Call with WCC planning officers	Call to discuss next steps on SoCG progression.

Date	Form of Contact	Summary
30/07/2020	Call with planning officers, landscape officer and ecologist from WCC	Call to discuss Converter Station design, Access Road, landscaping, and ecology matters in relation to Kings Pond/Denmead Meadows.
18/08/2020	Email	Issue of draft Biodiversity Position Paper to WCC officers.
25/08/2020	Call with planning, landscape and design officers from WCC, SDNPA and EHDC	Design group call to discuss Converter Station and Access Road design and Design Principles.
10/09/2020	Call with planning and ecology officers from WCC	Call to discuss matters around biodiversity and cable installation methods at Kings Pond / Denmead Meadows and associated impacts on habitats.
02/10/2020	Via email exchange	Draft of this SoCG agreed between WCC and the Applicant for submission into the Examination at Deadline 1.
21/10/2020	Design group call with officers from WCC, the SDNPA and EHDC	Design group call to discuss progress on Converter Station and Access Road design and Design Principles.
04/11/2020	Call with planning officers	Call to discuss carbon, climate change and transport matters.
10/11/2020	Call with planning officers, WCC's solicitor and Cllr Porter	Call to discuss latest draft of the DCO, deed of covenant and PPA.
11/11/2020	Call with planning and environmental health officers from WCC and EHDC	Call to discuss noise and air quality.

3. SUMMARY OF TOPICS COVERED BY THE STATEMENT OF COMMON GROUND

3.1. TOPICS COVERED IN THE STATEMENT OF COMMON GROUND

3.1.1.1. The following topics discussed between the Applicant and WCC are discussed within this SoCG:

- Planning policy
- Need for the Proposed Development including Fibre Optic Cable, issue of associated development, and legacy benefits
- Landscape and visual amenity
- Ecology (including arboriculture)
- Heritage and archaeology
- Traffic and transport
- Air quality
- Noise and vibration
- Socio-economics
- Cumulative effects
- Onshore Outline Construction Environmental Management Plan ('Onshore Outline CEMP')
- Draft DCO (including requirements to the draft DCO)
- Consideration of alternatives
- Carbon and climate change
- Flood risk and ground water

3.1.1.2. For the avoidance of doubt, matters not covered in this SoCG have not been discussed between the Parties as they have not been raised by WCC during the consultation undertaken to date between the Parties.

4. CURRENT POSITION

4.1. PLANNING POLICY

Table 4-1 – Planning Policy

Ref.	Description of matter	Current Position	RAG
Planning Policy			
WCC 4.1.1	Role of NPS EN-1	It is agreed that the relevant National Policy Statement ('NPS') for the Proposed Development is the Overarching National Policy Statement for Energy (EN-1) (2011) and represents the primary policy basis for the determination of the Application (as set out in the Planning Statement, Examination Library reference APP-108).	Agreed
WCC 4.1.2	WCC Development Plan	Local planning policies from the relevant authorities can be 'important and relevant' considerations for the Secretary of State ('SoS') in determining the Application. The Development Plan for PCC comprises (as set out at Appendix 4 of the Planning Statement, Examination Library reference APP-112): <ul style="list-style-type: none"> Local Plan Part 1: WCC and SDNPA Joint Core Strategy adopted March 2013; Local Plan Part 2: Development Management and Allocations adopted April 2017; Denmead Neighbourhood Plan 2011-2031 adopted April 2015; Denmead Village Design Statement Supplementary Planning Document adopted February 2016; Draft Traveller Development Plan Document, pre-submission version published January 2018. 	Agreed

4.2. NEED FOR THE PROPOSED DEVELOPMENT

Table 4-2 – Need for the Proposed Development

Ref.	Description of matter	Current Position	RAG
Need for the Proposed Development			
WCC 4.2.1	Need for the Proposed Development	The overarching need for the Proposed Development as set out in the Needs and Benefits Report (Examination Library reference APP-115) is a matter for consideration by the SoS as decision maker in considering applications for development consent under the PA2008.	Agreed
WCC 4.2.2	Wider benefits	WCC considers that, as raised in their Relevant Representation ('RR'), the Proposed Development offers no legacy benefits to the wider community. The Needs and Benefits Report sets out the long-term contribution that the Project will deliver in terms of decarbonisation, affordability and security of supply which will be of local (including for residents of Winchester) as well as national benefit. The Applicant welcomes WCC's agreement of this point.	Ongoing
WCC 4.2.3	Benefits to the local economy	The wider beneficial benefits of the Project in terms of job creation and economic activity are set out in the Needs and Benefits Report at section 2.4 where they relate to the local area, specifically:	Ongoing

Ref.	Description of matter	Current Position	RAG
		<ul style="list-style-type: none"> • New employment opportunities (section 2.4.4.); and • Wider economic activity (section 2.4.5). <p>Given the specialised nature of much of the construction a relatively high proportion of workers will come from outside the local area (with potential benefits from patronage of local services). Some aspects of construction can be undertaken by local contractors and will deliver some jobs in the local area. The Applicant considers that the overall temporary effect on the local economy through local labour and supporting local businesses would be beneficial but not significant (as concluded at paragraph 25.7.2.12 of Chapter 25 of the Environmental Statement).</p> <p>The Applicant welcomes confirmation from WCC that this assessment of the potential benefits from workers on local businesses during construction (i.e. beneficial but not significant) is accurate and agreed (also see section on socio-economics in 4.9 below).</p>	
WCC 4.2.4	Other economic benefits	<p>WCC considers that the claimed benefits to the local economy of Denmead and its immediate area from expenditure and overnight stays are unrealistic due to limited accommodation and that employees will be discouraged from using the road through the village.</p> <p>The Applicant considers that calculations for employment generation and benefits are realistic and were based on a conservative assessment as it was recognised that despite the scale of the Project, the nature of the construction work would largely require small specialist crews, likely to be sourced from outside the area. Using the Homes and Communities Agency Additionality Guide (2014), a multiplier of 1.5 was used for additional regional benefits above the relatively conservative number of jobs created. The approach to these calculations is set out in the methodology Section 25.4.3 of Chapter 25 (Examination Library reference APP-140) of the ES. Further, the Applicant notes that such benefits would include revenue from business rates during the Operational Phase.</p> <p>The Applicant agrees that the beneficial effects in the local economy are temporary and welcomes WCC's agreement to this.</p>	Ongoing
WCC 4.2.5	Employment and Skills Plan	<p>WCC would like to see an Employment and Skills Plan secured through a the DCO, offering work to local firms, recruiting via job centres and offering apprenticeships.</p> <p>An Employment and Skills Plan has been considered by the Applicant, but it is felt that due to the specialist nature of the majority of the work, it would be difficult to apply this in a meaningful way to the Proposed Development. However, measures will be put in place, where possible, to maximise the potential for the workforce and Proposed Development's supply chain to be sourced locally (paragraph 5.12.1.1 of the Onshore Outline CEMP (Examination Library reference APP-505)) and Section 25.9.2 of Chapter 25.</p> <p>The Applicant will be amenable to discussing this matter further to determine what may be further secured in this regard but noting that any such proposals need to be realistic in the context of the Proposed Development.</p> <p>WCC considers that the specialist nature of some of the work is not a reason to not sign up to an Employment and Skills Plan. Offers to put in place measures where possible to maximise the potential for the workforce and proposed developers supply chain to be sourced locally are considered to be meaningless without some clearly established framework to assess them against and if necessary, enforce. In WCC's opinion, there are two elements here: firstly, the workforce/trainee and supply issues and secondly, the educational dimension.</p> <p>This point remains under discussion.</p>	Ongoing

Ref.	Description of matter	Current Position	RAG
WCC 4.2.6	Site visits for students / pupils	In addition, WCC wants the Applicant to offer visits to the site during construction to students / pupils of local educational establishments with the idea of outlining the range of job opportunities that such a scheme highlights and promoting general safety regarding electricity infrastructure. The Applicant does not consider it is appropriate to invite school children to an active worksite for electricity infrastructure in light of health and safety requirements.	Ongoing
WCC 4.2.7	Community benefits – planning contributions	WCC considers that the proposal offers no legacy benefits to the local or wider community. The Applicant notes that the benefits at the national level will also provide benefits at the local level. However, the Applicant is willing to engage in discussions regarding planning obligations, though to date not contributions which satisfy the relevant legal tests have been outlined by WCC despite requests for this.	Ongoing
WCC 4.2.8	Community benefits – business rates	The Applicant notes that there will be local benefits arising from business rates being paid during the Operational Phases. A suitable time to discuss this in detail with WCC will be arranged.	Ongoing
WCC 4.2.9	Need for extra capacity of the Fibre Optic Cable	WCC has sought clarification over how much of the capacity of the Fibre Optic Cable ('FOC') will be available for commercial use and whether this element of the development is "associated development" The Applicant has explained that a communication link is integral to any HVDC interconnector and is essential for control, protection and telecoms purposes between the two converter station sites. The installation of FOC infrastructure as part of the HVDC scheme is common for such projects and is essential to supports its safe operation. The single FOC has 192 glass fibres, . Although the number of fibres required for Cable protection purposes is less, the FOC is required to have some overcapacity to accommodate levels of redundancy for failures. The outer diameter of the cable is required to be of a sufficient diameter to provide adequate protection for the fibres within, to withstand impacts associated with its transportation, installation and operation, and as such the Cable itself does not change if the number of fibres within it is reduced. Further, fibre optic cables are manufactured to include standard multiples of glass fibres rather than on a bespoke basis, and whilst a lesser multiple of glass fibres could be included, there is no benefit to such an approach being taken and the proposed use of spare fibres within the FOC for commercial purposes will represent a benefit of the Project (by helping to meet the future UK demand for fibre capacity in a cost and environmentally efficient way by avoiding the need for additional future fibre cables) fully realising its design capacity. The Applicant welcomes further discussions with WCC on this matter. Regarding WCC's query on whether the commercial use of the spare capacity within the FOC is associated development, the Applicant considers that the commercial use of the spare fibres within the FOC is associated development in accordance with how that term is defined at section 115(2) of the PA2008 and taking into account the relevant guidance issued by DCLG which identifies the characteristics of what may constitute associated development, and that development consent may therefore be lawfully granted for this use in accordance with Section 115 of the PA2008.	Ongoing

4.3. LANDSCAPE AND VISUAL AMENITY

Table 4-3 – Landscape and Visual Amenity

Ref.	Description of matter	Current Position	RAG
Landscape and Visual Amenity			

Ref.	Description of matter	Current Position	RAG
WCC 4.3.1	Area of study relevant to WCC	It is agreed that the parts of the Landscape and Visual Amenity assessment set out in Chapter 15 of the ES (Landscape and Visual Amenity) (Examination Library reference APP-130) relevant to WCC are Sections 1 (Lovedean (Converter Station Area)) to Section 4 (Hambledon Road (north)) which fall within WCC's administrative boundary.	Agreed
WCC 4.3.2	ES Methodology – Study area	It is agreed that the 8 km, 3 km and 1.2 km study areas for Section 1 (Lovedean – Converter Station Area) as set out in paragraphs 15.1.2.3 – 15.1.2.5 of ES Chapter 15 are appropriate. It is agreed that the 120 m study area on either side of the Onshore Cable Corridor, as set out in paragraph 15.1.2.6 of ES Chapter 15, is appropriate.	Agreed
WCC 4.3.3	ES Methodology – Viewpoints	The viewpoint selection for the Converter Station as set out in section 15.4.4 of ES Chapter 15 is agreed.	Agreed
4.3.4	ES Methodology – General	The Applicant welcomes WCC's review and agreement of the remaining aspects of the LVIA methodology set out in section 15.4 of Chapter 15, as it relates to the areas within WCC's administrative boundary (i.e. parts of Sections 1 – 4).	Ongoing
WCC 4.3.5	ES Baseline	The landscape and visual baseline environment is set out at section 15.5.3 of Chapter 15. The Applicant welcomes WCC's review and agreement of this baseline for the relevant sections.	Ongoing
WCC 4.3.6	Predicted impacts	The impacts considered to have the potential to give rise to temporary and / or permanent significant effects during construction and operation of the Proposed Development in relation to the Converter Station and Onshore Cable Corridor are identified at section 15.3.6 of ES Chapter 15. The Applicant welcomes WCC's review and agreement that section 15.3.6 of the ES contains an accurate assessment of the predicted impacts.	Ongoing
WCC 4.3.7	Embedded Mitigation – Converter Station	Section 15.7.1 of Chapter 15 sets out the embedded mitigation measures which would be implemented during the Construction Stage. The Applicant seeks WCC's review and agreement of these measures and are subject to ongoing discussion. As shown on Figure 15.48 and Figure 15.49 of the ES (Examination Library reference APP-281 and APP-282), measures have been taken to extend the existing ancient woodland further south and west of the Converter Station, and new hedgerows are proposed linking new areas of woodland and scrub. WCC considers that the visual screening would be more effective if it was reinforced and in doing so also provide stronger connectivity between features and for east-west movement of wildlife (which is covered in the ecology section 4.4.15 below). The Applicant welcomes further discussions on this point.	Ongoing
WCC 4.3.8	Embedded Mitigation – Access Road	The Applicant seeks agreement from WCC that the Applicant has considered the siting and landscape design of the Access Road and has sought to avoid its visual prominence from local public vantage points by providing screening in the form of hedgerows and trees along the edge of the road. The nature of the permanent surface of the Access Road and landscaping will be agreed at detailed design stage, maintaining some flexibility to integrate it into its immediate surroundings. WCC wishes to see the hedgerow along the south side of the Access Road thickened up into a belt providing a stronger feature. The Applicant considers that the mitigation as secured in the Outline OLBS is sufficient and acceptable. Discussions on this point are ongoing.	Ongoing
WCC 4.3.9	Embedded Mitigation – Onshore Cable Corridor	Section 15.8.8 of Chapter 15 sets out the embedded mitigation measures for section 3 (Denmead / Kings Pond) (see also section 4.4.21 below on ecology-related mitigation measures). Section 15.8.9 sets out the embedded mitigation measures for section 4 (Hambledon Road to Farlington Avenue). The Applicant seeks WCC's agreement of these measures in relation to the parts of the sections within WCC's administrative boundary.	Ongoing

Ref.	Description of matter	Current Position	RAG
WCC 4.3.10	Mitigation – Outline Landscape and Biodiversity Strategy	<p>WCC questions if sufficient mitigation or enhancements are being proposed in relation to the Converter Station Area to adequately mitigate both landscape and biodiversity impacts (see section 4.4 for biodiversity).</p> <p>It is the Applicant’s position that adequate measures are proposed to mitigate the likely significant impacts associated with the Converter Station Area, however the Applicant welcomes further discussions with WCC to seek to address any continuing concerns WCC may have regarding the landscaping proposed. Ongoing discussions will have regard to:</p> <ul style="list-style-type: none"> • The Outline Landscape and Biodiversity Strategy (‘OLBS’) (Examination Library reference APP-506) submitted with the Application, and the extent of the mitigation in that Strategy; • Requirements 7 and 8 of the dDCO which require the provision and approval of a written detailed landscaping scheme, which is to accord with the OLBS, prior to the commencement of Works No. 2 (relating to the Converter Station Area) and the implementation and maintenance of the landscaping in accordance with the approved written detailed landscaping scheme respectively. <p>The written detailed landscaping scheme is required to include detailed landscape mitigation plans together with management, maintenance and monitoring plans (paragraph 1.1.3.5 of the OLBS). It is also required to include management responsibilities in accordance with paragraphs 1.7.1.3 to 1.7.2.2 of the OLBS.</p>	Ongoing
WCC 4.3.11	Mitigation – Long-term management of landscaping	<p>WCC considers that the method of securing suitable control over the long-term retention of landscape features on land not intended to be purchased is currently unclear. This concern relates to the remote hedgerows that are identified as contributing to the screening of the building. WCC has queried why Applicant does not seek to acquire them to secure their future rather than entering into agreements with their respective landowners. WCC is concerned that there has been no disclosure of the contents of the deed of covenant and this mechanism offers less security than if the Applicant owned them. A further concern relates to the length of time any future management might apply in the context that the Project has a 40 year life.</p> <p>The Applicant notes that agreement, by way of 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 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 (Document Reference 4.1) and the Book of Reference (Document Reference 4.3) which WCC may wish to consider. The approach ensures the existing planting which provides a screening mitigation function is retained and can be managed for this purpose. The Applicant considers this to be an appropriate mechanism to secure control over the long-term retention of landscape features. The Applicant does not consider permanent voluntary acquisition of the land would be justified in the circumstances or would satisfy the legal tests for permanent compulsory acquisition where the retention and maintenance of landscaping may be achieved by the acquisition of rights and the imposition of restrictions only. It is not clear on what basis WCC assert this mechanism, which grants a legal interest in land for the benefit of the undertaker, offers less security than if the Applicant owned the land on which the existing vegetation is located.</p> <p>With regard to the long-term management, the Applicant confirms that they will be responsible for this during the operational life of the Converter Station.</p>	Ongoing
WCC 4.3.12	Mitigation – Design Principles – Converter Station Design	Six design meetings have been held with WCC, SDNPA and EHBC following the Section 42 Consultation to inform the development of the Design Principles.	Ongoing

Ref.	Description of matter	Current Position	RAG
		<p>The Design and Access Statement ('DAS') (Examination Library reference APP-114) includes General Design Principle 2 which requires the design to seek <i>"to integrate the proposed Converter Station and associated infrastructure into the surrounding topography, as far as practicable within operational requirements and environmental constraints"</i>. Discussions on the finished floor level and General Design Principle 2 are ongoing (see section 4.15.1 below above).</p> <p>Building Design Principle 3 contained in the DAS provides a range of colour gradings from a palette of autumnal colours to complement the surrounding landscape and include a colour grading across the building from dark to light. WCC considers that the building design principles need further refinement and that the cladding needs to be a darker recessive colour. The Applicant notes WCC's wish for darker colour than any shown on the colour palette. Following a design meeting with WCC, SDNPA and EHDC in August 2020, the Applicant has agreed to further review Building Design Principle 3. This point remains under discussion.</p> <p>The Applicant will continue to work with WCC, along with the other interested authorities, to seek agreement of the Converter Station Design Principles.</p>	
WCC 4.3.13	Mitigation – Design Principles – Access Road	<p>The Design Principles outlined in the DAS include a specific principle relating to the Access Road. General design principle 7 states that in terms of the access road <i>"[p]ermanent surfacing and landscaping will take account of the local context and be detailed in accordance with the Landscape Design Principles"</i> and <i>Landscape Design Principle 7 states "detailed landscaping proposals will include appropriate measures to maintain wildlife habitats and corridors wherever feasible"</i>.</p> <p>This point remains under discussion between the Parties.</p>	Ongoing
WCC 4.3.14	Mitigation – Onshore Outline CEMP – General Environmental Control Measures	<p>The Onshore Outline CEMP (Examination Library reference APP-506) section 5.2 (Landscape and Visual Amenity) sets out measures that may be considered during the Construction Phase to ensure protection of the existing landscape setting and views to the construction site. This section also sets out the proposals for headings around the Converter Station to visually contain many of the construction activities.</p> <p>The Applicant welcomes WCC's views on these proposed measures.</p>	Ongoing
WCC 4.3.15	Mitigation - Onshore Outline CEMP – Location Specific Construction Environmental Control Measures	<p>The Applicant also welcomes WCC's views and agreement on other measures set out in the Onshore Outline CEMP, including:</p> <ul style="list-style-type: none"> • Section 6.2.3 (Landscape and Visual Amenity); • Section 6.3.2 (Section 1 – Lovedean (Converter Station Area) – Landscape and Visual Amenity); • Section 6.4.2 (Section 2 – Anmore and Section 3 – Denmead / Kings Pond Meadow – Arboriculture and Landscape); • Section 6.5.1 (Section 4 – Hambledon Road (north) – Arboriculture and Landscape). 	Ongoing
WCC 4.3.16	Mitigation – Onshore Outline CEMP – Onshore Monitoring Plan	<p>The responsibilities and procedures for monitoring set out in set out in the Onshore Outline CEMP section 7.1 (Onshore Monitoring Plan – Landscape and Visual Amenity – Management of Vegetation) are yet to be discussed and agreed between the Parties</p>	Ongoing
WCC 4.3.17	Residual effects	<p>WCC's interests relate primarily to the residual visual and landscape effects on the Converter Station and Access Road.</p> <p>WCC has a concern over the residual effects on Stoneacre Copse (ancient woodland). WCC acknowledge that the 15 m standoff relating to any development conforms to the general approach to development in the proximity of an ancient woodland but WCC queried whether there was</p>	Ongoing

Ref.	Description of matter	Current Position	RAG
		<p>consideration given to the implications of severing the link of the woodland to the other landscape features to the south and west, as Stoneacre Copse will become isolated from its surroundings.</p> <p>The Applicant accepts that the proposed Access Road will separate Stoneacre Copse (ancient woodland) from other pockets of woodland through the severance of existing hedgerows. The mitigation that has been considered is set out above.</p> <p>Subject to further discussion in relation to predicted impacts and mitigation measures (as listed at to 4.3.7 - 4.3.16) the Applicant seeks WCC's review and agreement of the assessment of residual effects set out at Tables 15.10 and 15.11 of Chapter 15 of the ES.</p>	

4.4. ONSHORE ECOLOGY (INCLUDING ARBORICULTURE)

Table 4-4 – Onshore Ecology (including Arboriculture)

Ref.	Description of matter	Current Position	RAG
Onshore Ecology (including Arboriculture)			
WCC 4.4.1	Area of study relevant to WCC	It is agreed that the parts of the Onshore Ecology assessment set out in Chapter 16 of the ES (Onshore Ecology) (Examination Library reference APP-131) relevant to WCC are Sections 1 (Lovedean (Converter Station Area)) to Section 4 (Hambledon Road (north)) which fall within WCC's administrative boundary.	Agreed
WCC 4.4.2	ES Methodology – Study area	It is agreed (as noted in section 16.1.2 of Chapter 16) that the study areas for ecological features are appropriate.	Agreed
WCC 4.4.3	ES Methodology – Biodiversity assessment	<p>WCC have requested further information on the Applicant's approach to assessing biodiversity impacts.</p> <p>The Applicant has prepared a 'Biodiversity Position Paper' which has been provided in draft to WCC on 18 August 2020. This paper will be submitted into the Examination in due course.</p> <p>The Applicant is currently in discussion with WCC over the contents of this paper.</p>	Ongoing
WCC 4.4.4	ES Baseline	The ecological baseline is set out at section 16.5 of Chapter 16. The Applicant welcomes WCC's review and agreement of this baseline for Sections 1 – 4 (where Section 4 is located within the administrative boundaries of WCC).	Ongoing
WCC 4.4.5	Predicted impacts	<p>The impacts with regard to ecological / environmental designations and species in relation to the Converter Station Area and Onshore Cable Corridor are identified (including mitigation) at sections 16.6.1 and 16.6.2 of Chapter 16 of the ES. The Applicant welcomes WCC's review and agreement that these represent an accurate reflection of the predicted impacts.</p> <p>WCC is seeking a greater level of detail on the impacts of the Cable installation in the area between Hambledon Road and Anmore Road which is mostly designated as a Site of Interest for Nature Conservation.</p> <p>A meeting to discuss those matters was held between WCC and the Applicant in September 2020. Discussions on this point are ongoing.</p>	Ongoing
WCC 4.4.6	Predicted arboricultural impacts	WCC is concerned about the assessed impacts of the worst-case scenario, which assumes the potential loss of all trees / hedgerows within the Order limits. WCC considers that the loss of all features would result in unacceptable harm to the landscape. WCC wishes to see the level of detail relating to the Cable installation refined so more specific detail is available which means precise impacts can be identified.	

Ref.	Description of matter	Current Position	RAG
		<p>The Applicant seeks WCC's agreement that, regardless of whether the impacts are acceptable, the assessment of the worst case is appropriate in EIA terms.</p> <p>Discussions on the acceptability of the assessed worst case are ongoing.</p>	
WCC 4.4.7	Mitigation – embedded	The embedded mitigation measures set out in paragraphs 16.6.1.1 – 16.6.2.1 of Chapter 16 of the ES are matters of ongoing discussion and yet to be agreed with WCC.	Ongoing
WCC 4.4.8	Mitigation – Onshore Outline CEMP	The Onshore Outline CEMP (Examination Library reference APP-505) section 5.3 (Onshore Ecology), including precautionary methods of works and arboriculture to avoid and where not possible mitigate the loss of trees and hedgerows within the Order limits is yet to be discussed and agreed with WCC.	Ongoing
WCC 4.4.9	Mitigation – Outline Landscape and Biodiversity Strategy – Converter Station Area – Figure 6.10.1	<p>In relation to Figure 6.10.1 in the OLBS (Examination Library reference APP-506), WCC considers that there is a weakness in the east-west biodiversity links that is not sufficiently mitigated. WCC considers that PW5 which is a new block of planting north of the station connects with EH-8 going north but offers weak (no) connectivity to the east. WCC considers that PW-5 should be extended across to link up with EH-5. This is clear of the overhead pylon line so growth in terms of height should not be a problem in WCC's view.</p> <p>The Applicant has responded explaining that this planting lies beyond the Order Limits and would sever the existing arable field. It is not considered the benefits of such planting would mitigate the impacts of the Proposed Development or would provide a meaningful benefit which would outweigh the impacts of providing it, and it is therefore not considered the landscaping is of such necessity it would be appropriate to justify the acquisition of the land required to provide it.</p> <p>WCC considers that the Order Limits should be expanded, and if necessary, a vehicle access gap could be left.</p> <p>This matter remains under discussion between the Parties.</p>	Ongoing
WCC 4.4.10	Mitigation – Outline Landscape and Biodiversity Strategy – Security of delivery	<p>WCC considers that the biodiversity mitigation needs greater security in terms of delivery, maintenance and future management.</p> <p>The Applicant notes that Requirement 9 of the draft DCO secures the need for a written biodiversity management plan, which accords with the OLBS, to be submitted to and approved by the relevant local planning authority in consultation with the relevant statutory nature conservation bodies, and where appropriate the Environment Agency, prior to the commencement of Works No. 2 (relating to the Converter Station Area) and for this to be carried out as approved.</p> <p>The Applicant looks forward to discussing further the OLBS with WCC to seek to address any continuing concerns.</p>	Ongoing
WCC 4.4.11	Mitigation – Outline Landscape and Biodiversity Strategy – Hedgerow PH-2	<p>WCC considers that PH-2 could be thickened up in depth on its south side (away from the pylon line) making a much stronger link east west between EH-9 and EH-7.</p> <p>This is noted by the Applicant. The purpose of the hedgerow was to replicate the position of a historic hedgerow based on OS maps from 1842-1952. Whilst the hedgerow could be thickened to create a stronger link, it lies within 30 m exclusion zone from a 400 kV overhead lines and planting would need to be kept low in height.</p> <p>WCC considers that planting could be graded to increase in height moving away from the overhead line. This planting would both increase landscape screening and improve east-west connectivity.</p>	Ongoing

Ref.	Description of matter	Current Position	RAG
WCC 4.4.12	Mitigation – Outline Landscape and Biodiversity Strategy – Hedgerow PH-3	<p>This point remains under discussion.</p> <p>WCC considers that the new hedgerow PH-3 that is to be planted on the south side of the access roadway should be thickened up to provide a better landscape feature, to improve east–west movement, and to provide more opportunities for interconnections with the woodland PW-16 and ST2. WCC also considers there would also be some benefit screening the Access Road from the footpath.</p> <p>This is noted by the Applicant. This planting would lie beyond the Order Limits and result in the loss of arable land. It is not considered such planting would provide meaningful and necessary screening mitigation, the benefits of its provision would not outweigh the impacts of placing landscaping on this land, and it is therefore not considered the landscaping is of such necessity it would be appropriate to justify the acquisition of the land required to provide it.</p> <p>It has been noted that the Access Road will need to increase in gradient to enter the Converter Station compound reflecting the changes in levels that are proposed. Details of how this is to be achieved and the implications on the ground along both sides have been sought by WCC.</p> <p>These points remain under discussion.</p>	Ongoing
WCC 4.4.13	Mitigation – Outline Landscape and Biodiversity Strategy – Attenuation Pond	<p>WCC considers that if the proposed attenuation pond could be moved into the field to the west, the space freed up could be given over to planting trees to improve the screening of the Converter Station.</p> <p>The Applicant notes that the attenuation pond relates directly to the Converter Station and proposed Access Road in terms of runoff. There are no existing surface water drainage systems in the vicinity of the site to connect to. The reasons for the proposed location of the attenuation ponds include avoidance of existing site constraints as well as optimising their effectiveness:</p> <ol style="list-style-type: none"> 1. The Converter Station Area slopes north to south and therefore the proposed locations are ideal for a gravity drainage system. 2. Considering constraints imposed by existing OHLs, ancient woodland, existing hedgerows and access to the Converter Station Area, these are the only available locations. 3. Having two smaller ponds minimises land take to the north of an existing residential property. 4. The locations are ideal to collect run off from the Converter Station compound, telecommunication buildings and the Access Road. <p>The alternative location proposed by WCC is outside the Order Limits. Relocating this pond and associated water supply to this area would require an additional access to maintain the attenuation pond. A new access route off the proposed Access Road would sever the existing linear woodland belt to the west of the Converter Station which serves an important visual screening function. Access via Old Mill Lane would result in an access route across or edging the arable field adding further infrastructure. It is not considered the provision of landscaping in this location would add any meaningful mitigation benefit in terms of screening the Converter Station, and any potential benefits of moving the attenuation ponds to provide additional planting in this area would not outweigh the adverse impacts of doing so.</p> <p>WCC acknowledged the above points made by the Applicant and queried whether allocation closer to the ancient woodland was considered for the pond, as that would provide potential for greater synergy between the two habitat types. WCC considers that if the pond cannot be moved, then the enhancement of planting to the north of the compound becomes more important to achieve.</p> <p>The Applicant confirms that the pond cannot be moved for the reasons set out above.</p> <p>This point in relation to planting remains under discussion.</p>	Ongoing

Ref.	Description of matter	Current Position	RAG
WCC 4.4.14	Mitigation – Outline Landscape and Biodiversity Strategy – PW-16	WCC welcomes the enhancement of the habitat associated with the ancient woodland area PW-16 but considers that it would just create a peninsular feature with poor opportunities to link up with the new planting on the other side of the new Access Road. This is noted by the Applicant; however, the Applicant notes that there will still be an appropriate level of connectivity, and providing further linkages would not result in a different assessment outcome. The Applicant welcomes WCC's agreement of this point.	Ongoing
	Mitigation – Outline Landscape and Biodiversity Strategy – PW-17	WCC considers that area PW-17 should be enhanced out to the edge of the road. This is being considered by the Applicant. This point remains under discussion.	Ongoing
WCC 4.4.15	Mitigation – Outline Landscape and Biodiversity Strategy – Links between PW-16 and PW-17	WCC queried whether there could be other links across the Access Road from PW-17 to PW-16, under the road or over at tree top level. The Applicant responded that as this will be an unmanned site, during the Operational Stage it is the expectation that the Access Road will only be used for access to the Converter Station during maintenance, security visits, and for emergency faults or repairs. The low use by vehicles minimises the severance introduced. The Access Road is also unlit at night. In addition, the surveys did not identify any notable or protected species in this area that would be impacted by severance from this road. Under road tunnel links have been used on other projects for several species including badgers and amphibians. The Access Road will not provide a barrier to badger movement due to its low level of use. Great crested newts were not found to be present in the area and mitigation is not required. Over road link mitigation has been used with respect to bats and current evidence suggests that they have very limited success. This point remains under discussion.	Ongoing
WCC 4.4.16	Mitigation – Outline Landscape and Biodiversity Strategy – Habitat Piles	WCC considers that if any trees are lost within the Converter Station Area then the cut wood should be used to form habitat piles. This is currently being considered by the Applicant.	Ongoing
WCC 4.4.17	Mitigation – Onshore Outline CEMP – General Environmental Control Measures	The Onshore Outline CEMP (Examination Library reference APP-505) section 5.3 (Onshore Ecology), including precautionary methods of works and arboriculture is yet to be agreed with WCC.	Ongoing
WCC 4.4.18	Mitigation - Onshore Outline CEMP – Location Specific Construction Environmental Control Measures	The Applicant also welcomes WCC's views and agreement on other measures set out in the Onshore Outline CEMP, including <ul style="list-style-type: none"> • Section 6.2.2 (Arboriculture); • Sections 6.3.3 and 6.3.4 (Section 1 Lovedean – Converter Station Area – Onshore Ecology and Arboriculture); • Sections 6.4.1 and 6.4.2 (Section 2 – Anmore and Section 3 – Denmead/Kings Pond – Onshore Ecology and Arboriculture and Landscape); • Section 6.5.1 (Section 4 Hambledon Road (north) – Arboriculture and Landscape). 	Ongoing
WCC 4.4.19	Mitigation – Onshore Outline CEMP – Onshore Monitoring Plan	The following sections of the Onshore Outline CEMP: <ul style="list-style-type: none"> • Section 7.1 (Onshore Monitoring Plan - Arboriculture - Protection of trees) and • Section 7.1 (Onshore Monitoring Plan - Onshore Ecology - Construction impacts to the environment) 	Ongoing

Ref.	Description of matter	Current Position	RAG
WCC 4.4.20	Mitigation – Onshore Outline CEMP – Arboricultural Matters	<p>Are yet to be discussed and agreed.</p> <p>As outlined in Section 5.3.4.1 to 5.3.4.7 of the Onshore Outline CEMP trees will be avoided where practicable and felling would be a last resort. Consideration will be given to replanting like for like where trees need to be removed. WCC has requested more detail with precise measures setting out how this situation will be avoided should be provided.</p> <p>This point remains under discussion.</p>	Ongoing
WCC 4.4.21	Mitigation – Onshore Outline CEMP – Kings Pond / Denmead Meadows	<p>The full extent of the SINC designation has been recognised by the Applicant.</p> <p>WCC considers the intention to drill at Kings Pond / Denmead Meadows to be a positive step, however, WCC considers that the implications of the establishment of the temporary drilling site at Denmead Meadows in field no. 3 as shown on figure EN020022-ES-APP-16.4-2 in Appendix 16.4 of the ES (Examination Library reference APP-412) need to be clarified.</p> <p>The Applicant has considered alternative location for the compound and engineering constraints have led to a conclusion these are not possible. Therefore, the Applicant has taken steps to reduce the size of the compound as far as practicable. Additionally, the Applicant has been in discussion with Natural England to agree a strategy for the mitigation associated with the installation of the compound and future reinstatement and monitoring/management. Key actions as part of the mitigation plan include:</p> <ul style="list-style-type: none"> • Avoidance of damage to habitats outside of works areas; • Works to be timed to avoid the growing season and winter wet season; • Seed harvesting from compound area; • Turf stripping and preservation from compound area; • Soil structure preservation and avoidance of soil compaction; • Restoration of lowland meadow habitat following completion of HDD work through returning of turves and re-seeding; and • Preconstruction survey of habitat followed by three years monitoring. <p>Moving the compound and entry point to the South of Hambledon Road would present additional engineering difficulties with regards to Cable installation as additional bends are being introduced, which lead to additional Joint Bays potentially being needed along Hambledon Road. A large section of tree and hedgerow on the South side of Hambledon would also need to be removed to allow the ducts to gradually re-enter the highway, which it is preferable to avoid.</p> <p>WCC is considering the above key actions.</p> <p>WCC notes that it is not clear from which direction the northern compound will access the main road and considers Kings Pond / Denmead Meadows to be so sensitive that it needs its own specific methodology statement which includes mitigation measures. This should form its own requirement. The Applicant notes that the direction from which access is taken is shown on the Access and Rights of Way Plans (Examination Library reference APP-011).</p> <p>Ecological measures for Kings Pond and Denmead Meadows are both subject to the Onshore Outline CEMP. Because of the contiguous nature of the grassland across Denmead Meadows as a whole, which includes Kings Pond, it is considered appropriate to cover any mitigation measures within the same document.</p>	Ongoing

Ref.	Description of matter	Current Position	RAG
		This point remains under discussion.	
WCC 4.4.22	Residual effects	Subject to further discussion in relation to predicted impacts and mitigation measures, the Applicant seeks WCC's agreement of the assessment of residual effects set out in section 16.9 and table 16.9 of Chapter 16 of the ES.	Ongoing
WCC 4.4.23	Requirement - Biodiversity Management Strategy / Plan	The draft DCO and Requirement 9 which would require LPA approval of a Biodiversity Management Strategy / Plan with mitigation and enhancement measures is yet to be agreed.	Ongoing

4.5. HERITAGE AND ARCHAEOLOGY

Table 4-5 – Heritage and Archaeology

Ref.	Description of matter	Current Position	RAG
Heritage and Archaeology			
WCC 4.5.1	ES Methodology – Study area	It is agreed that the study area of 500 m from the Order Limits as set out in section 21.1.2 of ES Chapter 21 (Heritage and Archaeology) (Examination Library reference APP-136) is appropriate.	Agreed
WCC 4.5.2	Scope of Geophysical Survey	The scope is agreed with the WCC Archaeologist, and survey subsequently completed.	Agreed
WCC 4.5.3	ES Baseline	The baseline environment is set out at section 21.5 of ES Chapter 21. The Applicant welcomes WCC's review and agreement of this baseline for the relevant sections.	Ongoing
WCC 4.5.4	Predicted impacts	Predicted impacts considered to have the potential to give rise to likely significant effects are set out at section 21.6.2 of ES Chapter 21 (document reference 6.1.21). The Applicant welcomes WCC's review and agreement that these represent an accurate reflection of the predicted impacts.	Ongoing
WCC 4.5.5	Mitigation – Onshore Outline CEMP – General Environmental Control Measures	Section 5.8 (Heritage and Archaeology) of the Onshore Outline CEMP (Examination Library reference APP-505) sets out a range of mitigation measures on which WCC's views are sought in relation to the relevant sections (1 – 4).	Ongoing
WCC 4.5.6	Mitigation - Onshore Outline CEMP – Onshore Monitoring Plan	The measures set out in section 7.1 (Onshore Monitoring Plan - Heritage and Archaeology – Archaeological remains) of the Onshore Outline CEMP are yet to be discussed and agreed.	Ongoing
WCC 4.5.7	Residual effects	Subject to further discussion in relation to predicted impacts and mitigation measures, the Applicant seeks WCC's agreement of the assessment of residual effects set out at section 21.9 and table 21.6 of Chapter 21 of the ES.	Ongoing
WCC 4.5.8	Requirement 14 – Archaeology	The draft DCO and its requirement 14 requiring a WSI for areas of interest as identified in the ES (requiring LPA approval), with works carried out in accordance with the approved scheme is yet to be agreed.	Ongoing

4.6. TRAFFIC AND TRANSPORT

Table 4-6 – Traffic and Transport

Ref.	Description of matter	Current Position	RAG
Traffic and Transport			

Ref.	Description of matter	Current Position	RAG
WCC 4.6.1	Engagement	It is agreed that engagement will be undertaken with HCC Highways, who have the remit for such matters in the City of Winchester.	Agreed
WCC 4.6.2	Predicted impacts – Hambledon Road	<p>Whilst HCC is the relevant highway authority, WCC has raised a concern that there is insufficient detail relating to the methodology and impacts associated with laying the two Cable Circuits in the Hambledon Road (see plate 3.23 in Examination Library reference APP-118) when the constraints which are evident in and alongside this single carriageway road are taken into account. The Applicant has provided WCC with some further details on the concerns raised, and discussions are ongoing.</p> <p>WCC also wishes to see an absolute commitment in the dDCO that Hambledon Road is kept open to allow the unrestricted free flow of all types of traffic in both directions (using TL if necessary) during the full period of the cable installation works. That the same free flow is also maintained for pedestrians / cycle users. The Applicant notes that works will be undertaken in accordance with the FTMS which is secured in the dDCO. There will be no need for a full road closure on Hambledon Road.</p> <p>The Applicant welcomes WCC's agreement of this point.</p>	Ongoing
WCC 4.6.3	Assessment of delays	<p>WCC has raised concerns over the assessment of delays and impacts on the local community of the roadworks. In the event more extensive impacts are identified, clear mitigation needs to be put forward.</p> <p>The impacts of the traffic management required to facilitate construction of the Onshore Cable Route has been assessed in the Transport Assessment and Chapter 22 of the ES using a reasonable worst-case analysis that includes shuttle working traffic signals on the B2150 Hambledon Road. This has also been assessed in Chapter 23 – Air Quality. The methodology and scope of traffic impact analysis has been agreed with HCC as the highway authority and has used the Sub-Regional Transport Model to consider the direct impacts along the Onshore Cable Corridor, and indirect impacts associated with reassignment of traffic onto alternative routes to avoid the works.</p> <p>The duration of impacts is determined by the installation rate of the ducts for the Onshore Cable Route, assumed to be an average of 18-30m per day based upon professional experience of similar projects. All assessments of impacts are based upon a worst-case average installation rate of 18m per day or 100m per week and are therefore robust. The duration of impact has also been fully considered when determining the magnitude of impact at each location stated within the Chapter 22 of the ES and therefore increases in the duration of construction are unlikely to alter the significance of effect already determined or the mitigation required to be provided in connection with those effects.</p> <p>The strategy to mitigate the traffic impacts resulting from installation of the Onshore Cable Route is detailed within the FTMS for all locations (APP-449) and due to the nature of the works this strategy will not be required to change in the unlikely event of increases in the duration of construction. The FTMS also sets out a programme for when all construction works may take place, including where construction in adjacent or nearby locations is prohibited. This will therefore ensure that delays to construction in multiple locations at any one time will not result in a cumulative traffic impact beyond that already assessed.</p> <p>As noted in section 4.6.3 above, WCC wish to see absolute an commitment in dDCO that the Hambledon Road is kept open to allow unrestricted free flow of traffic in both directions (using TL if necessary) during the full period of the cable installation works and that the same free flow is also maintained for pedestrians / cycle users.</p> <p>WCC also seek clarification over the knowledge base of the road condition.</p>	Ongoing

Ref.	Description of matter	Current Position	RAG
		This point remains under discussion.	

4.7. AIR QUALITY

Table 4-7 – Air Quality

Ref.	Description of matter	Current Position	RAG
Air Quality			
WCC 4.7.1	ES Methodology – Study area	The area of study (as noted at section 23.1.2 of the updated ES Chapter 23 (Air Quality) (Examination Library reference REP1-033) is agreed.	Agreed
WCC 4.7.2	ES Methodology	The use of the Institute of Air Quality Management ('IAQM') Dust Assessment methodology, aligned with the Transport Assessment and modelling) and inclusion of emissions related to traffic diversions, construction traffic, and the temporary and permanent emissions from backup power generation, is agreed.	Agreed
WCC 4.7.3	ES Baseline	The baseline is set out at section 23.5 of ES Chapter 23 and is agreed.	Agreed
WCC 4.7.4	Predicted impacts	Predicted impacts are identified at section 23.6 of Chapter 23 of the ES and are agreed.	Agreed
WCC 4.7.5	Mitigation – Onshore Outline CEMP – General Environmental Control Measures	The measures set out in section 5.11 (Air Quality) of the Onshore Outline CEMP are agreed.	Agreed
WCC 4.7.6	Mitigation – Onshore Outline CEMP – Onshore Monitoring Plan	The measures set out in section 7.1 (Onshore Monitoring Plan - Air Quality - Human and Ecological receptors) of the Onshore Outline CEMP are agreed.	Agreed
WCC 4.7.7	Residual effects	The assessment of residual effects set out in table 23.116 of Chapter 23 of the ES is agreed.	Agreed

4.8. NOISE AND VIBRATION

Table 4-8 – Noise and Vibration

Ref.	Description of matter	Current Position	RAG
Noise and Vibration			
WCC 4.8.1	ES Methodology – Study area	The study area as set out in paragraphs 24.1.2.2 to 24.1.2.9 of ES Chapter 24 (Noise and Vibration) (Examination Library reference APP-139) is agreed.	Agreed

Ref.	Description of matter	Current Position	RAG
		The study area for construction and operational impacts at the Converter Station Area, as set out in paragraphs 24.1.2.2 to 24.1.2.4 of ES Chapter 24 is agreed.	
WCC 4.8.2	ES Methodology	<p>The detailed methodology for the Converter Station Area operational assessment, as set out in section 24.4.5 of ES Chapter 24 is agreed.</p> <p>The detailed methodology for the Construction Stage elements relevant to the Converter Station Area set out in section 24.4.2 (noise) and 24.4.3 (vibration) of ES Chapter 24 is agreed.</p>	Agreed
WCC 4.8.3	ES Baseline	The methodology for the collection of baseline data for the Converter Station Area set out in section 24.4.1 of ES Chapter 24 is agreed. A query regarding the consideration of wind speeds during the survey data analysis was raised by WCC during discussions post submission. Supplementary information in response to WCC's query on wind speeds was issued to WCC on 20 July 2020 and submitted in section 17.2 and Appendix 12 of the ES Addendum at Deadline 1. Following a call between the Applicant and WCC on 11 th November 2020, the ES baseline information is agreed.	Agreed
WCC 4.8.4	Predicted Impacts	<p>Predicted impacts of noise and vibration for the Proposed Development are set out in section 24.6 of Chapter 24 of the ES and Chapter 17 of the ES Addendum</p> <p>Following the submission of supplementary information in the ES Addendum in response to WCC's query on wind speeds during the baseline noise survey, the predicted impacts of the Operational Stage assessment at the Converter Station Area, detailed in paragraphs 24.6.2.15 to 24.6.2.24 of ES Chapter 24, and section 17.2 of the ES Addendum, are agreed.</p> <p>Following the Applicant's explanation in a call on 11th November 2020 of the revised predicted impacts for the construction assessment relevant to WCC in section 17.3 of the ES Addendum, the predicted impacts of the noise and vibration Construction Stage assessment at the Converter Station Area, as set out in section 24.6.2 of ES Chapter 24, are agreed.</p>	Agreed
WCC 4.8.5	Mitigation – Onshore Outline CEMP – General Environmental Control Measures	The mitigation measures relevant to construction at the Converter Station Area, as set out in section 5.12 of the Onshore Outline CEMP are agreed.	Agreed
WCC 4.8.6	Requirement 20 – Control of noise during operation	<p>Draft DCO requirement 20 with regards to Works No. 2 (i.e. the Converter Station Area), sets out the requirement for a noise management plan, which should include the mitigation (and attenuation achieved by these measures) to minimise noise, and a scheme for noise monitoring to ensure compliance with the noise criteria, and a complaints procedure (requiring LPA approval).</p> <p>The principle of a noise management plan is agreed, and the principle of embedding the noise criteria (Chapter 24 of the ES and Chapter 17 of the ES Addendum) into the Converter Station design is agreed.</p> <p>During consultation discussions, WCC requested that the noise criteria for the Converter Station Area, contained in Chapter 24 of the ES, and revised by section 17.2 of the ES Addendum, are explicitly secured through Requirement 20 of the dDCO.</p> <p>The Applicant provided a written response to WCC on 19 June 2020, including proposed revised wording for Requirement 20 of the dDCO which addresses the requests made during consultation discussions.</p>	Agreed

Ref.	Description of matter	Current Position	RAG
		<p>The revised wording of Requirement 20 submitted in the updated draft DCO at Deadline 1 makes reference to the <i>Operational Broadband and Octave Band Noise Criteria Document</i> (REP1-129), which is a certified document that will be contained at Schedule 14 to the dDCO. The document will set out the operational daytime and night-time broadband and octave band noise criteria for the Converter Station Area, which are based on Chapter 24 of the ES, as revised by section 17.2 of the ES Addendum</p> <p>This is now agreed.</p>	
<p>WCC 4.8.7</p>	<p>Requirement 18 – Construction Hours</p>	<p>Proposed working hours are a key consideration for noise and vibration as they determine the times of day that noise and vibration impacts may be experienced.</p> <p>The proposed core working hours for the converter station area (i.e. Works No. 1 and 2) of between 0800 and 1800 hours on weekdays and 0800 and 1300 hours on Saturdays excluding public holidays, except in the event of emergency unless otherwise agreed (requiring LPA approval) are agreed.</p> <p>Further clarity was requested from WCC on the definition of a ‘start-up and shut-down activity’, which are stated in Requirement 18 of the draft DCO as potentially occurring up to an hour either side of the core working hours.</p> <p>The Applicant provided a written response to WCC on 19 June 2020 confirming the proposed definition of a ‘start-up and shut-down activity’, and that the absence of this definition in Requirement 18 of the dDCO was an accidental omission. The proposed definition of a ‘start-up and shut-down activity’ is as follows:</p> <p><i>“start-up and shut-down activities” means at the start of the working day the opening up of the site, the arrival of site staff & contractors, changing into appropriate PPE wear, pre-shift briefings, site inductions, tool box talks, and all associated site safety checks and at the end of the working day the cleaning and tidying of work areas, changing out of PPE wear, post-shift debrief, the departure of site staff and contractors, and closing and securing the sites”.</i></p> <p>Based on this definition, the Applicant considers start-up and shut-down activities to comprise standard practises which are not considered to give rise to noise or vibration effects that warrant separate assessment. This is now agreed.</p> <p>WCC noted that the proposed working hours for Works No.3 (i.e. temporary work areas in the vicinity of the Converter Station) are not stated in Requirement 18 of the draft DCO, and further information was requested by WCC on how the temporary work areas will be used and what working hours will apply. The Applicant provided a written response to WCC on 19 June 2020 as follows.</p> <p><i>“The temporary work areas will be used in conjunction with Works No. 1 and 2 (the Converter Station Area) and Works No. 4 (the Onshore Cable Corridor). The core working hours that apply to the temporary work areas is the same as the core working hours for the works it is to be used in connection with. Therefore, the core working hours for the temporary work area will be Weekdays 0700-1800 hours and Saturday 0800-1300 hours.</i></p> <p><i>With respect to the use of the laydown areas outside of the core working hours, it has been confirmed that contractors for the HDD works (where different working hours apply) would not require use of these areas. With respect to the out-of-hours works required for cable duct laying for the Onshore Cable Corridor, it has been confirmed that access to the cable route laydown areas near the Converter Station would not be required outside of the core working hours stated above. Therefore, the use of the laydown areas outside of the core working hours would be limited to start-up and shut-down activities up to one hour either side of the core working hours.”</i></p> <p>This is now agreed.</p>	<p>Agreed</p>

Ref.	Description of matter	Current Position	RAG
		The proposed core working hours for Works No. 4 (i.e. the laying of the onshore HVDC cables) are between 0700 and 1700 hours on weekdays and 0800 and 1300 hours on Saturdays, excluding public holidays, except in the event of emergency unless otherwise agreed by the LPA.. Following the clarifications on the ES Addendum provided by the Applicant, and given the absence of any significant adverse noise or vibration effects associated with the elements of Works No. 4 that fall within the jurisdiction of WCC, this is now agreed	

4.9. SOCIO-ECONOMICS

Table 4-9 – Socio-economics

Ref.	Description of matter	Current Position	RAG
Socio-economics			
WCC 4.9.1	ES Methodology	The study area is set out in section 25.1.2 of ES Chapter 25 (Socio-economics) (Examination Library reference APP-140). The Applicant welcomes WCC's review and agreement of the study area and methodology as relevant to the sections (1 – 4) within WCC's administrative boundary.	Ongoing
WCC 4.9.2	ES Baseline	The baseline environment is set out at section 25.5 of ES Chapter 25. The Applicant welcomes WCC's review and agreement of this baseline for the relevant sections.	Ongoing
WCC 4.9.3	Predicted Impacts	The predicted impacts are set out at section 25.7 of ES Chapter 25. The Applicant welcomes WCC's review and agreement of the proposed mitigation.	Ongoing
WCC 4.9.4	Mitigation - Onshore Outline CEMP – General Environmental Control Measures	The Applicant welcomes WCC's views and agreement on other measures set out in the Onshore Outline CEMP (Examination Library reference APP-505), including on section 5.12 (Socio-economics).	Ongoing
WCC 4.9.5	Mitigation - Onshore Outline CEMP – Location Specific Construction Environmental Control Measures	The measures set out in section 6.2.8 (Socio-economics) of the Onshore Outline CEMP are yet to be agreed.	Ongoing
WCC 4.9.6	Residual effects	Subject to further discussion in relation to predicted impacts and mitigation measures, the Applicant seeks WCC's agreement of the assessment of residual effects set out at section 25.10 and tables 25.15 of Chapter 25 of the ES.	Ongoing

4.10. CUMULATIVE EFFECTS

Table 4-10 – Cumulative Effects

Ref.	Description of matter	Current Position	RAG
Cumulative Effects			

WCC 4.10.1	Methodology	It is agreed that the approach taken to the assessment of cumulative effects, including the zone of influence is set out in section 29.4 of ES Chapter 29 of the ES (Cumulative Effects) (Examination Library reference APP-144) is appropriate and proportionate, in accordance with PINS Advice Note 17 (Cumulative Effects Assessment).	Agreed
WCC 4.10.2	Assessment	It is agreed that the Applicant has taken account of all relevant planned and consented projects within the administrative boundary for WCC as set out within section 29.5 of ES Chapter 29.	Agreed
WCC 4.10.3	ES Chapter	The assessment of Cumulative Effects for the Proposed Development as set out in table 29.14 of Chapter 29 of the ES are yet to be agreed.	Ongoing

4.11. ONSHORE OUTLINE CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

Table 4-11 – Onshore Outline Construction Environmental Management Plan

Ref.	Description of matter	Current Position	RAG
Onshore Outline Construction Environmental Management Plan			
-	-	<i>For topic specific outline CEMP environmental control measures see the relevant specialist/topic areas.</i>	
WCC 4.11.1	Roles and Responsibilities	The Onshore Outline CEMP (Examination Library reference APP-505) and the personnel with defined environmental responsibilities as set out in Section 3 of the Onshore Outline CEMP are yet to be agreed between the Applicant and WCC.	Ongoing
WCC 4.11.2	General Environmental Requirements	The General Environmental Requirements set out in Section 4 of the Onshore Outline CEMP: <ul style="list-style-type: none"> • Requirements and Consents; • Competence, Training and Awareness; • Internal Communication; • External Communication; • Method Statements; and • Environmental Incidents; Are yet to be agreed	Ongoing
WCC 4.11.3	Monitoring and Review	The CEMP and the proposal for an Environmental Manger to be responsible for maintaining the register of all environmental monitoring, to be made available for auditing and inspection as set out in Section 7 of the Onshore Outline CEMP are yet to be agreed.	Ongoing
WCC 4.11.4	General Environmental Control Measures	The proposed general environmental control measures contained in Section 5 of the Onshore Outline CEMP, where relevant to the Converter Station Area and Onshore Cable Corridor within WCC's administrative boundaries, are yet to be agreed.	Ongoing
WCC 4.11.5	Location Specific Construction Environmental Control Measures	The proposals for site specific management measures for Sections 1 to 4 (where relevant for WCC) as set out in Section 6 of the Onshore Outline CEMP are yet to be agreed.	Ongoing

4.12. DRAFT DEVELOPMENT CONSENT ORDER

Table 4-12 – Draft Development Consent Order

Ref.	Description of matter	Current Position	RAG
Draft DCO and Draft Requirements			
WCC 4.12.1	Part 2 Principle Powers – Transfer to another party	<p>WCC queried that if the powers of the DCO are transferred to another party, at what stage would they go through the ‘financial soundness test’ that the Applicant has been required to undergo.</p> <p>The Applicant has clarified that any transfer of the benefit of the DCO, except those expressly provided otherwise in the draft DCO, is subject to the consent of the Secretary of State, who will take into account all relevant matters before the transfer may take effect. Those exceptions expressly provided for in the DCO are limited to other statutory undertakers in relation to specific works which fall within the scope of their function, and the appropriateness of those exceptions will be considered during the Examination of the DCO as necessary.</p> <p>WCC has requested further justification of this approach. The Applicant is unclear what further justification is required, or why WCC takes issue with wording included in all made DCO’s.</p> <p>This point remains under discussion.</p>	Ongoing
WCC 4.12.2	Operative Provisions	<p>The draft DCO is being reviewed by WCC, and consequently the wording of the operative provisions is yet to be agreed.</p> <p>WCC has queried Article 9 of the draft DCO in respect to statutory nuisance, in respect of three points:</p> <ol style="list-style-type: none"> 1. The principle of its inclusion in the draft DCO; 2. Without prejudice to the outcome of point 1.) above, the principle of applying Article 9 to the construction phase; 3. Without prejudice to the outcome of point 1.) above; the principle of applying Article 9 to the operational phase. <p>With regard to point 1.) above, WCC considers that Article 9 should be removed from the draft DCO altogether.</p> <p>The Applicant has advised that Article 9 will remain in the DCO as it is necessary to protect the delivery of the nationally significant infrastructure project. The Applicant has explained other examples to WCC. This point remains under discussion, with the Applicant to provide revised drafting to seek to address the comments raised.</p>	Ongoing
WCC 4.12.3	Discharge of Requirements (procedure and timescales)	The draft DCO is being reviewed by WCC, and consequently the procedure and timescales provided for the discharge of requirements, contained at Schedule 3, are yet to be agreed.	Ongoing
WCC 4.12.4	Interpretation	The draft DCO and its explanation of meaning are yet to be agreed.	Ongoing
WCC 4.12.5	Interpretation - 1(4) – Converter Station Roof	WCC notes that this allows items including solar panels to be placed on the roof of the Converter Station, which contradicts the commitment that there will be no plant on the roof.	Ongoing

Ref.	Description of matter	Current Position	RAG
		<p>The Applicant has clarified that this does not automatically allow items to be placed on the roof of the Converter Station. Details of the Converter Station, including any plant requirement, will have to be submitted to and approved by WCC in accordance with Requirement 6 and be in accordance with design principles of the Design and Access Statement. The Applicant has also clarified that solar panels will not be placed on the building's roof and reference to this will be removed from the dDCO.</p> <p>This point remains under discussion.</p>	
WCC 4.12.6	Interpretation – (6)(b) – Measurement of Building	<p>WCC notes that (6)(b) states to take measurements of the building height from existing ground, however the site is not level and subject to cut and fill to create a level platform. Plans show height about platform level.</p> <p>The Applicant has considered this point. To ensure the Proposed Development is always within the envelope assessed, a maximum building height of +111.10 m AOD is proposed to be included in the dDCO (being +85.10 m AOD + 26m so representing the top of the assessed envelope).</p> <p>This point remains under discussion.</p>	Ongoing
WCC 4.12.7	Requirements	<p>The structure and nature of the Requirements of the draft DCO at Schedule 2 which are of relevance to WCC are yet to be agreed.</p> <p>WCC notes that number of the requirements seek to address the submission of detail to more than one of the host authorities and considers that for requirements 5, 6, 7 and 9, the Applicant should be exploring if these requirements are better split between the relevant LPAs. The Applicant considers the split is already provided for by virtue of the matters which are relevant to each authority being those which are located within their administrative boundaries, and that further wording to 'split' the Requirements is unnecessary.</p> <p>The Applicant is happy to consider any further comments in this regard.</p> <p>This point remains under discussion.</p>	Ongoing
WCC 4.12.8	Alignment with French works	<p>WCC considers that there should be a requirement that work does not start on any part of the onshore development until the work on the French side has been approved and is ready to start. WCC considers that a synchronised start would be ideal and that this should be a clause in the DCO.</p> <p>The Applicant considers that such a provision is neither necessary nor appropriate in planning terms. The Other Consents and Licences document (Examination Library reference APP-106) confirms the position in relation to the French consents to be obtained, including the progress being made in relation to them, which broadly aligns with the progress to be made on the DCO.</p> <p>This point is not agreed.</p>	Ongoing
WCC 4.12.9	Requirement 3 – Phases of authorised development onshore	<p>Draft DCO requirement 3 for a written scheme setting out phases of the authorised development to be submitted and approved by the LPA is yet to be agreed. The requirement refers to relevant local planning authority, accordingly only phases relevant to WCC will be submitted to WCC.</p> <p>The Applicant welcomes WCC's agreement of this Requirement.</p>	Ongoing

Ref.	Description of matter	Current Position	RAG
WCC 4.12.10	Requirement 4 – Converter Station option confirmation	WCC’s position in favour of Option B(ii) is noted, however at this stage the Applicant cannot commit to taking only Option B(ii) forward. If agreement is reached with National Grid before the end of the Examination, Option B(i) may be removed from the draft Order.	Ongoing
WCC 4.12.11	Requirement 5 – Converter Station and Optical Regeneration Station parameters	<p>The parameters within draft DCO requirement 5 are yet to be agreed.</p> <p>WCC queried whether Requirement 5 Table WN2 should refer to Converter Halls rather than [a] Hall, and whether this table should include a reference to the overall size of the compound (200 m by 200 m).</p> <p>The Applicant has confirmed that the description of the Authorised Development in Schedule 1 confirms what is permitted to be built within the Converter Station Area, and in relation to the Converter Halls confirms that two may be built. Therefore Requirement 5 confirms the size parameters for a Converter Hall, with it already being established two of these are permitted to be constructed.</p> <p>The extent of the compound is confirmed on the relevant parameter plans, which also identifies the areas within which the buildings and equipment are to be located by reference to Requirement 5 contained in Schedule 2 to the DCO.</p> <p>The Applicant welcomes WCC’s agreement of this Requirement.</p>	Ongoing
WCC 4.12.12	Requirement 6 – Detailed design approval	<p>The details for which detailed design approval are sought under draft DCO Requirement 6 with regard to Works No. 2, Works No. 3 and where relevant Works No. 4, are yet to be agreed.</p> <p>WCC has sought clarification as to whether Work No. 2 includes the Access Road and where the construction details are secured, including details of those points where the road punches through a hedgerow where it is supposed to reduce in width. WCC also sought clarification over where details for Work No. 3 are secured. WCC considers that the details for Work No. 4 (cable laying) should include details of the actual vegetation to be lost, lopped or cut back and Root Protection Areas to be impacted by the actual cable laying. WCC noted that there is no detail in Work No. 4 regarding the HDD site in Kings Pond Meadow in terms of its establishment and then reinstatement / dismantling</p> <p>The Applicant has clarified that Requirement 6 does not specifically list out all elements forming part of Works No. 2, this information is provided at Schedule 1. All information is relevant to all aspects save where more specific (e.g. attenuation ponds), and therefore the layout, scales, external appearance and materials of the Access Road will need to be submitted and approved. The area within which the Access Road may be located is already confirmed on the parameter plans, with Requirement 5 confirming the area in which the access road may be built by reference to this. The Applicant notes WCC’s comments regarding Work No. 3 and the Requirement will be updated to require the submission of appropriate details for approval in this regard, taking into account the temporary nature of the works and use in this location.</p> <p>The above points remain under discussion.</p>	Ongoing
WCC 4.12.13	Requirement 7 – Provision of landscaping	The wording of draft DCO requirement 7 is yet to be agreed.	Ongoing
WCC 4.12.14	Requirement 8 – Implementation and	The wording of draft DCO requirement 8 is yet to be agreed.	Ongoing

Ref.	Description of matter	Current Position	RAG
	maintenance of landscaping		
WCC 4.12.15	Requirement 9 – Biodiversity management plan	<p>The wording of draft DCO requirement 9 is yet to be agreed.</p> <p>WCC has queried where the issue of nesting, breeding or dormancy periods referred to that will limit the time of year work can take place within is secured. WCC queried the long-term management of the vegetation for the life of the Proposed Development. WCC has also suggested that there could be two separate requirements, one addressing vegetation and RPA loss during construction and the second about long term management.</p> <p>The Applicant has explained that the OOCEMP (section 6.21) defines working periods within which impacts on ecological features can be avoided including breeding birds. This measure is included to ensure compliance with the Wildlife and Countryside Act (1981, as amended). Furthermore, the OOCEMP outlines (in section 6.3.3) the time of year proposed for improvement of remaining grassland at Lovedean while a full overview of management prescriptions with regards to Denmead Meadows / Kings Pond is provided in section 6.4.1.</p> <p>The Outline Landscape and Biodiversity Strategy paragraph 1.4.5.1 refers to the maintenance of existing hedgerows / hedgerow trees within the Order Limits in perpetuity. This includes restrictions associated with the removal of hedgerows / trees, introduction of new hedgerows / hedgerow trees, gapping up of existing hedgerows and new hedgerow planting to replace hedgerows grubbed out within the Order Limits.</p> <p>The detailed written landscape scheme / final strategy will include detailed landscape mitigation plans together with management, maintenance and monitoring plans (Examination Library reference APP-506 paragraph 1.1.3.5). The final strategy will include an identical description of the restrictions with regards to breeding birds as included in the OOCEMP.</p> <p>The Applicant welcomes WCC’s agreement of this Requirement.</p>	Ongoing
WCC 4.12.16	Requirement 10 – Highway Access	<p>WCC considered that this requirement should be discharged by WCC, not HCC.</p> <p>The Applicant has explained that HCC, as the Highway Authority with responsibility for matters related to the Highway, are the appropriate authority to approve the details required by Requirement 10.</p> <p>WCC had anticipated that all applications for access points go to the District and consider that, at the very least, WCC should be consulted on the detail if it is submitted to HCC.</p> <p>This point remains under discussion.</p>	Ongoing
WCC 4.12.17	Requirement 11 – Fencing and other means of enclosure	<p>The parameters for the security perimeter fence are confirmed in Requirement 5. Details for security perimeter fence are covered by Requirement 6.</p> <p>WCC has queried whether 6(1) should refer back to the elements listed in R5 table WN2.</p> <p>This point remains under discussion.</p>	Ongoing
WCC 4.12.18	Requirement 15 – CEMP	<p>The draft DCO requirement for a CEMP according with the outline CEMP, per phase (requiring LPA approval) is yet to be agreed. <i>See reference to Onshore Outline CEMP within tables below for specific topic/theme considerations</i> is yet to be agreed.</p>	Ongoing

Ref.	Description of matter	Current Position	RAG
WCC 4.12.15	Requirement 16 – External construction lighting	Requirement will be revised to confirm the removal of the lighting is required prior to the Operational Phase, which is defined at Article 2 of the draft DCO. Subject to this amendment, the Applicant seeks WCC's agreement of this requirement.	Ongoing
WCC 4.12.16	Requirement 18 – Construction Hours	<p>The proposed standard working hours for Works No. 1 and 2 are between 0800 and 1800 hours on weekdays and 0800 and 1300 hours on Saturdays excluding public holidays, except in the event of emergency unless otherwise agreed (requiring LPA approval. For Works No. 4 they are between 0700 and 1700 hours on weekdays and 0800 and 1300 hours on Saturdays, excluding public holidays, except in the event of emergency unless otherwise agreed by the LPA.</p> <p>Requirement 18 will be updated to include working hours for Works No. 3, which are proposed to be the same hours as the Works it is to be used in connection with (0700 to 1800 hours).</p> <p>It is proposed that a definition of start up and shut down activities will be included in the DCO. This will confirm only non-percussive works may take place, such a site briefings, changing into work clothes etc. during these hours.</p> <p>Subject to this amendment, the Applicant seeks WCC's agreement of this requirement.</p>	Ongoing
WCC 4.12.17	Requirement 19 – Traffic management strategy	The wording of draft DCO requirement 19 in relation to a traffic management strategy, which is to be approved by the relevant highway authority in consultation with the relevant planning authority, is yet to be agreed.	Ongoing
WCC 4.12.18	Requirement 20 – Control of noise during the operational period	The wording of draft DCO requirement 20 with regard to a noise management plan for Works No. 2 is yet to be agreed.	Ongoing
WCC 4.12.19	Requirement 21 – Travel plan	<p>The wording of draft DCO requirement 21 with regard to a travel plan for Works No. 2 is yet to be agreed.</p> <p>WCC has queried whether this requirement includes preparation and clearance work. The Applicant has clarified that it is not considered that the carrying out of the onshore site preparation works will give rise to traffic effects such that a travel plan for construction works needs to be approved in relation to them. There is currently no intention to therefore amend this Requirement to apply to those works.</p> <p>This point remains under discussion.</p>	Ongoing
WCC 4.12.20	Requirement 22 – Restoration of land used temporarily for construction	The draft DCO requirement for reinstatement of land to its former condition (LPA approval) within not more than 12 months of completion is yet to be agreed.	Ongoing
WCC 4.12.21	Requirement 23 – Control of lighting during the operational period	<p>WCC has queried whether there should be a definition of exceptional circumstances. The Applicant considers that a definitive list of exceptional circumstance is not considered to be appropriate given it is not possible to define all exceptional circumstances and is also not necessary.</p> <p>This point remains under discussion.</p>	Ongoing

Ref.	Description of matter	Current Position	RAG
WCC 4.12.22	Requirement 24 – Requirement for written approval	The wording of draft DCO requirement 24 is assumed to be agreed. WCC confirmation of this is sought.	Agreed
WCC 4.12.23	Requirement 25 – Amendment to approved details	The draft DCO requirement 25 for development to be carried out with approved details unless any amendment or variation is previously agreed in writing with the relevant LPA or LHA, being in accordance with the principles of the ES is yet to be agreed.	Ongoing
WCC 4.12.24	Requirement – decommissioning	WCC has noted that there is no decommissioning requirement in the event Converter Station ceases to be used. The Applicant has clarified that decommissioning is not expected for at least 40 years, and thus consent for decommissioning has not been applied for. WCC have expressed concern that without a decommissioning requirement there could be a vacant building with pressure for an alternative use. This point remains under discussion.	Ongoing

4.13. ALTERNATIVES

Table 4-13 – Alternatives

Ref.	Description of matter	Current Position	RAG
Alternatives			
WCC 4.13.1	Choice of Lovedean substation	WCC considers that there is a lack of detail in the evidence base for the choice of Lovedean over other alternatives and the degree to which the proximity to the National Park played in that decision. Correspondence with NGET should be included. The Applicant has confirmed that in undertaking the assessment of the reasonable alternatives for the Proposed Development the Applicant considered multiple grid connection options. The potential for impacts on the SDNP was considered in relation to proposed connections at both Bramley Substation and Lovedean Substation. With regard to Bramley Substation the potential impacts on SDNP related to the potential cable corridor, which would have been required to be located through and/or in close proximity to the national park. With regard to Lovedean Substation the potential impacts on SDNP related to the location of the Converter Station area in close proximity to the existing Lovedean Substation. It is the view of the Applicant that a proportionate and appropriate level of information regarding the considerations of the reasonable alternative grid connections points is provided within Chapter 2 to the ES (Examination Library reference APP-117). In addition, further information is currently being prepared to provide further detail, including with regard to information provided by NGET. The studies undertaken by NGET are subject to confidentiality requirements and for this reason cannot be provided and have been appropriately summarised in the information to be submitted. The Applicant welcomes further discussions with WCC on this point.	Ongoing
WCC 4.13.2	Microsited Converter Station Options	WCC notes that the Converter Station is a significant building in a countryside location. WCC will object to the location of the building if Option (i) is to be adopted but supports Option(ii) which saves the substantial hedgerow. WCC considers that negotiations with National Grid must be accelerated with a clear path identified before the Examination is completed. If the land is not available a clear compelling reason must be identified. WCC would like to remove Option B(i) from the draft Order.	Ongoing

Ref.	Description of matter	Current Position	RAG
		The Applicant's preferred solution is Option B(ii), however at this stage the Applicant cannot commit to taking only Option B(ii) forward. However, if a position is agreed with National Grid in advance of the end of the Examination, Option B(i) may be removed from the proposed Order.	
4.13.3	Converter Station Access Road	Alternative options for the siting of the Access Road were explored (paragraph 2.6.5.8 to 2.6.5.13 Chapter 2 Consideration of Alternatives (Examination Library reference APP-117)), however due to the size of the vehicles required during construction and (occasional) replacement of equipment during operation access across Broadway Lane just north of Broadway Cottages was considered the most feasible solution. WCC does not object to the proposed location of the Access Road in principle.	Agreed
WCC 4.13.4	Choice of Onshore Cable Route	WCC considers that the option of considering a route for the Onshore Cable across the open countryside to the west of the A3 has not been properly assessed as an alternative to the road route. WCC has requested further information on the suitability of potential alternative routes across open countryside to the west of the A3. Justification for the route chosen is provided in Chapter 2 – Consideration of Alternatives of the ES. Further, the Applicant is in the process of reviewing the information taken into account when this alternative option was considered and will provide a comprehensive update in this regard in due course. The Applicant welcomes further discussions with WCC on this point.	Ongoing

4.14. CARBON AND CLIMATE CHANGE

Table 4-14 – Carbon and Climate Change

Ref.	Description of matter	Current Position	RAG
Carbon and Climate Change			
4.14.1	Carbon mitigation	WCC has noted that there are questions why no further actions are proposed over carbon emissions in the Construction Phase, and that a large residual amount still remains from the anticipated emissions which are not mitigated in any way. 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. Mitigation measures related to construction carbon (including embodied emissions (A1-3)) include - as detailed in the Onshore OCEMP (APP-505) Section 5.14.2: Minimise energy consumption including fuel usage by, for example, reducing the requirement for earth movements to/from and within the construction site; Maximise the local sourcing of materials and local waste management facilities, where practicable; Use efficient construction processes, such as design for manufacture and assembly; and As far as practicable, incorporating material resource efficiency and waste minimisation best practice into design, in particular improving the cut/fill balance of the Proposed Development. The OCEMP also requires that the detailed design continues to be optimised to reflect the carbon reduction hierarchy and the requirement for construction materials is reduced, with construction elements substituted for low-carbon alternatives, where practicable. It is recommended that the specification of materials and products with reduced greenhouse gas emissions is considered and that the sustainability credentials of material suppliers and construction contractors, is considered, where practicable.	Ongoing

Ref.	Description of matter	Current Position	RAG
		<p>This is outlined in the Onshore OCEMP in Section 5.14.2.1 where it states that the Converter Station design will adopt a sustainable approach which will involve the following measures:</p> <p>Reducing, where practicable, material use in construction and minimising the use of high carbon materials.</p> <p>Buildings should be energy and resource efficient.</p> <p>The above measures are also captured in Sustainability Design Principle 2 in section 6.2.4 of the DAS. Requirement 6 of the draft DCO requires that the design details to be submitted to the relevant local planning authority for approval in advance of construction of any phase of Works No. 2 (excluding Works No. 2a) must confirm how the details submitted conform with the Design Principles in section 6 of the DAS.</p> <p>Following mitigation, likely construction emissions were assessed as minor, significant, adverse (see 28.6.2.9 of ES Chapter 28). The mitigation opportunities above will reduce, but will not prevent, greenhouse gas emissions from occurring during the construction phase. A construction project of this scale will inevitably lead to greenhouse gas emissions of a scale which would lead to an adverse effect of at least minor significance.</p> <p>This point remains under discussion.</p>	

4.15. FLOOD RISK AND GROUND WATER

Table 4-15 – Flood Risk and Ground Water

Ref.	Description of matter	Current Position	RAG
Flood Risk and Ground Water			
WCC 4.15.1	Converter Station – Finished Floor Levels	<p>WCC has a desire to see the building set into the ground as much as possible and considers that any surplus spoil resulting from digging deeper beyond a simple cut and fill approach can be easily disposed of. WCC has therefore requested clarification on the choice of 85.1 m AOD as the finished floor level of the Converter Station and why the excavations could not go any deeper, including dialogue with the Environment Agency and Portsmouth Water.</p> <p>The Applicant has provided WCC with the following summary of explanations on why the finished floor level was set at 85.1 m AOD:</p> <p>Ground investigations (both intrusive and non-intrusive) were carried out in 2018/19. These found that the area beneath the proposed Converter Station is directly underlain by head deposits consisting predominantly of gravelly Clays, with Structureless Grade D Chalk below. Surveys were also undertaken to identify potential karstic features. The surveys located three potential karstic features of which two are within the proposed footprints for Converter Station option B(i) and option B(ii).</p> <p>The area beneath the proposed Converter Station is known to be underlain by a Principal Aquifer (chalk), designated as the Aquifer Source Protection Zone 1 ('SPZ1'). A considered approach must be taken for the SPZ1 to mitigate any potential contamination, turbidity or groundwater issues arising because of the construction, operation and maintenance activities over the design life of the Proposed Development. To ensure any contamination of the aquifer is avoided and considering the assessment of the potential for a cut and fill exercise to be undertaken, 84.80 m AOD was identified as the lowest appropriate Converter Station finished site level from a flood risk perspective. Following an initial Flood Risk assessment, the Converter Building finished floor level has been proposed indicatively at 85.10 m AOD (300 mm above finished site level). Therefore, for the basis of the EIA, 85.10 m AOD has been used.</p>	Ongoing

Ref.	Description of matter	Current Position	RAG
		<p>The Applicant notes that the Statements of Common Ground that are being prepared with the Environment Agency and Portsmouth Water will set out the position agreed between these parties and the Applicant.</p> <p>This matter will be subject to further discussions beyond Deadline 1 and is therefore ongoing.</p>	

5. SIGNATURES

Ref.	Winchester City Council	AQUIND (the Applicant)
Signature		
Printed Name		
Title		
On behalf of	Winchester City Council	AQUIND Limited
Date		

