From:	Guymer, Tim
To:	Aquind Interconnector
Cc:	Guymer, Tim; Richard Turney; McCart, Gemma; Ackerman, Ian; Drury, Holly; Stickland, Caroline (Solicitor); Hirst, Chris; Murray, Chris (Planning); Richard Turney; Joel Semakula
Subject:	EN020022 Aquind Interconnector - Deadline 5 submission from Hampshire County Council (Reference: 20025080)
Date:	30 November 2020 17:03:51
Attachments:	Aquind Deadline 5 HCC overview of oral submissions for Dec hearings_20025080.pdf Aquind Deadline 5 HCC submission_20025080.pdf

Dear Sirs

Please find enclosed the following submissions from Hampshire County Council (HCC):

- An overview of HCC's proposed oral submissions for the forthcoming December hearings; and
- HCC's formal submissions at Deadline 5, providing updates from the Highway Authority and Lead Local Flood Authority.

An update to HCC's Statement of Common Ground with the applicant has been agreed and is to be submitted by the applicant.

Finally, in relation to Issue Specific Hearing 3 (Environmental Matters) to be held on 15 December 2020, I can confirm that HCC does not intend to make any oral submissions for this hearing. Tim Guymer will be attending the hearing on behalf of HCC and will be available to provide any HCC specific input as may be sought by the Examining Authority.

Yours sincerely,

Tim Guymer

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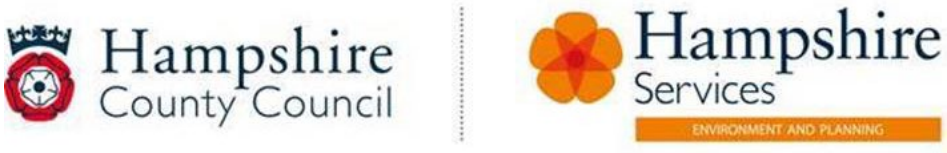

Hampshire County Council's Deadline 5 Submission

Highway Authority Update

Highway Subsoil Matters

In order to support the understanding of the risk associated to Hampshire County Council (HCC), principally acting in its role as the Highway Authority, on areas of land which may be subject to CPO powers the Highway Authority requested a GIS version of the order limits to overlay on the Highway Boundary. This has been provided.

On review of the information it is evidence that HCC does not have any land outside the highway boundary of which it has an interest. Matters relating to the proposed subsoil acquisition are still ongoing with the Applicant. The Highway Authority has provided an overview of its position in response to the hearing agenda on this topic.

Permit Scheme

The Applicant and Highway Authority have been in discussions with regard to the application of the Hampshire County Permit Scheme. It has been agreed that the Applicant will seek to amend the draft Protective Provisions in order to reflect a now agreed position to utilise the Permit scheme with the Framework Traffic Management Scheme (FTMS) setting out the parameters in which the permits will be provided. The Highway Authority are waiting an updated FTMS from the Applicant to reflect these discussions and other matters raised within its deadline 3 response.

Temporary Construction Accesses

Additional information has been provided in relation to the temporary construction access requirements in relation to the locations shown on the Access and Rights of Way Plan rev 2 submitted at deadline 1. This information is in the form of a standard detail and associated tracking drawings of the proposed access arrangements. The drawings submitted are:

- AQ-UK-DCO-TR-LAY-001 Rev A Typical Construction Access Layout
- AQ-UK-DCO-TR-LAY-002 Rev A Construction Access Layout Swept Path Analysis of Cable Drum Delivery Vehicle
- AQ-UK-DCO-TR-LAY-003 Rev A Construction Access Layout Swept Path Analysis of Large Tipper

HCC have now reviewed these documents and wish to make the following comments.

The temporary fencing shown in drawing number AQ-UK-DCO-TR-LAY-001 Rev A is proposed to be setback 1 metre from the edge of the highway. To achieve better visibility splays from the accesses, a 2 metre setback should be provided. Any tree or hedgerow removal required to provide the visibility splays will be subject to

replacement planting which should be agreed with the relevant Local Planning Authority or the provision of a CAVAT payment commensurate with the cost of the asset if it is owned by the Highway Authority.

Any vehicular access provided over existing footways will require the lowering of utilities, normally to a minimum of 600mm. Any concrete protection slab will require the relevant statutory undertaker to provide written confirmation that it would be acceptable.

To confirm the reinstatement requirements upon completion of the works, the Applicant should undertake pre-commencement and post completion condition surveys of the road in the vicinity of the temporary access. Any reinstatement works should be carried out in accordance with HCC specification.

The swept path plots provided by the Applicant assumes a 7.3m wide carriageway for all vehicles attempting to manoeuvre in and out of the accesses. Locations such as Anmore Lane (access point AC/2/a) and the unnamed road between Edneys Lane and Anmore Lane (access point AC/1/d and e) are noted to have 5.5m and 4m wide carriageways respectively. Given the constrained road widths at these locations, 16.5m articulated lorries may have difficulty accessing the proposed site accesses. Details of the lorry movements to these construction access points have been requested from the Applicant, along with appropriate tracking drawings for these narrower locations.

Regarding the unnamed road to the south of the converter station site, the construction access will need to be full depth construction given that the CBR values are likely to be low in this area. Tie in detail to the carriageway will require a glass-grid layer between the base and binder layer.

Visibility splay requirements are not set out within the standard detail, nor are proposed construction details. These should also be included. With regards visibility splays, if these are to be based on the posted speed limit these will need to be in accordance with Design Manual for Roads and Bridges (DMRB) requirements. Visibility splays below DMRB requirements will only be acceptable where recorded speeds are less than 37mph. In such instances, the Manual for Streets visibility splays would be accepted by the Highway Authority.

Converter Station Internal Layout

Within the Highway Authority's deadline 3 response and its Local Impact Report (LIR), clarification was sought on the arrangement for construction traffic parking. In response. the Applicant has submitted drawing AQ-ITT-UK-LAY-101 revision PO1 within Appendix 6 of the Onshore Outline Construction Environmental Management Plan. The drawing confirms that sufficient space will be allocated to construction workers on the southern side of the converter station access road. This now addresses all remaining highway matters pertinent to the internal site layout.

Bus Impacts

To forecast the impact on bus services along the cable route, a bus journey time assessment has been undertaken within the Supplementary Transport Assessment (STA). The Sub Regional Transport Model (SRTM) has been run during the AM and PM peak hours with the same do minimum and do something scenarios which have been utilised within the junction capacity assessment. The SRTM has been coupled with link speeds to derive the time taken for a bus to travel from the start to the end of its route.

The bus routes assessed within HCC's area are as follows: 7, 8, 21, 37, 39 and D2. Bus routes 7 and 8 covers the area between Portsmouth and Horndean, while the remaining routes cover a range of areas including Havant and Waterlooville. A number of bus services operate along the cable route, primarily bus route 8 which routes along the A3 London Road for circa 3km of the construction route.

Table 50 of the STA summarises the results of the bus journey time assessments by comparing the journey times along the aforementioned routes across both the Do Something scenarios and presenting this as either a percentage increase or decrease when compared against the Do Minimum run.

It is noted from the results that routes 7, 8, D2, 21, 37 and 39 all experience journey time increases across the assessment. Of significance, route 39 experiences a 11% and 31% journey time increase on the respective northbound and southbound services during both the DS1 and DS2 scenarios in the AM peak hour. This corresponds to a journey time increase of 7 minutes 57 seconds and 6 minutes 46 seconds respectively. Route number D2 also experiences a significant delay of 20% and 18% increase in journey time in the respective northbound and southbound services in the PM peak hour. This corresponds to a journey time increase of 2 minutes 24 seconds and 2 minutes 11 seconds respectively.

HCC have engaged directly with representatives from Stagecoach and First Group. First Group can see that delays will likely be incurred by the project on routes 7 and 8. They are comforted by the commitment to maintain bus priority wherever possible however there is concern that there are a lot of unknowns and the true impact won't be known until such time as the works are taking place. They would therefore wish to reserve the right to react and plan any additional vehicles where appropriate. There are also concerns regarding the impact of the TM especially temporary traffic lights and the knock-on impacts to other routes where additional resources may also be required. This matter is also reflected in HCC discussions with Stagecoach. Furthermore, the joint HCC/PCC Transforming Cities Fund (TCF) bid will improve bus infrastructure and services along the A3. Given the substantial investment into bus priority along the corridor and the additional funding which will be provided through the TCF bid, the delays created by the construction works will potentially undermine this strategy, requiring support for these commercial services.

The Applicant summarises the results by stating that there will generally be a minor impact on the bus services impacted during the construction period and therefore no mitigation has been offered. Based on the journey time analysis provided, HCC as

Local Transport Authority have concerns that the maintenance of certain bus service including those directly contracted by the authority, will be restricted during the construction phase owing to the delays predicted in the bus journey time assessment and the reduced patronage of these services during the period of disruption. No assessment has been undertaken to understand the implications of delays to these services, nor whether additional buses will need to be provided to ensure the timely operation of each bus route during the phased installation of the cable. Should additional buses be required on any of the routes, the Applicant should be required to bear the cost of this throughout the affected period. This should be done by entering into a service level agreement with the Highway Authority through the S106 agreement which secures engagement with the bus operators and the Transport Authority to discuss and review each service when the works commence to understand if the forecast delays require mitigation, funded by the Applicant.

Site Access

Within HCC's deadline 3 response, the following information was requested in relation to the site access to the converter station:

- Confirmation that the Applicant owns the land required to construct the haul road;
- Hedgerow removal to achieve the northbound visibility splay;
- Position of the 'no right turn signage' on the highway;
- Confirmation the haul road will be metalled;
- Provision of a Stage 1 Road Safety Audit; and
- Parking plan for the construction workers.

Following HCC's deadline 3 response, conversations have been held with the Applicant to address the points raised above. The parking plan is addressed under the 'Converter Station Internal Layout' section of this response. The remaining matters are addressed below:

Haul Road Land Ownership

The Applicant has confirmed that the haul road sits within the order limits and the Applicant therefore controls the land required to construct the haul road. This matter is now considered acceptable although it is noted to be a potential point of discussion within the December hearings regarding the need to CPO land.

Hedgerow Removal to Achieve Northbound Visibility Splay

Following discussions with the Applicant, the northbound hedgerow was proposed to be removed and replaced with planting set back from the visibility splays. The landscape and ecological issues arising from this proposed approach should be discussed with the local planning authority. From the Highway Authority's perspective, as an asset owned by HCC, it would also require a CAVAT value to be identified for the hedgerow and compensation paid to cover the loss of this asset. Any replacement planting would not be within the highway boundary and therefore cannot be deemed to be replacement of its lost asset. This matter should be secured within the DCO.

'No Right Turn' Signage

The Applicant has agreed to provide additional 'no right turn' signage from the access road on the highway. HCC are awaiting a plan from the Applicant detailing the proposed additional signage position for approval.

Haul Road Surfacing

The Applicant has confirmed that the haul road will be metalled to prevent migratory material being dragged onto the highway from the HGV and AIL's utilising the access road. This matter is considered acceptable.

Stage 1 Road Safety Audit

HCC understand the Applicant is in the process of carrying out a Stage 1 Road Safety Audit of the access proposals. HCC would welcome sight of the results when available.

Miscellaneous

It has been noted that there is a small section of the southbound visibility splay from the site access and sections of both the northbound and southbound visibility splay from the haul road which will need to be dedicated to the Highway Authority. This matter should be secured within the DCO.

Traffic Management on Day Lane

Following HCC's Deadline 3 response, further discussions have been held with the Applicant to understand how traffic movements will be managed along Day Lane. HCC's Deadline 3 response questioned the traffic management strategy for Day Lane. This was primarily focussed on the inability of a HGV and a car to pass on Day Lane and the lack of available passing spaces, the proposed use of Banksmen to control HGV movements and the safety issue of holding cars and goods vehicles at the junction with Day Lane/Lovdean Lane and the properties along Day Lane. It is understood that the Applicant is currently working on an updated traffic management strategy along Day Lane. HCC would welcome sight of the updated strategy when available. The Applicant has been referred to the approved Construction Traffic Management Plan (CTMP) for managing lorry movements at the IFA2 Chilling site[1] where access along Hook Lane, Fareham is of a similar nature with regards to the constraints of a rural road network.

It has been noted that Chapter 22 of the Environmental Statement (ES) states that there will be 86 lorry movements operating in 8 hour shifts along Day Lane. The CTMP proposals for Day Lane refer to 6 lorry movements an hour. Clarity is therefore sought on this point as the numbers do not appear to be consistent.

Finally, within the information submitted for Deadline 4 it has been brought to the Highway Authority's attention that there is potential significant amounts of soil movements required in order to create the proposed calcareous grassland area.

[1] https://www.nationalgrid.com/ifa2-interconnector/connecting-britain-to-clean-energy?utm_source=ETWebsite&utm_medium=IFA2page&utm_campaign=IFA2

The Highway Authority request confirmation that lorry movements associated with this activity at the site has been appropriately accounted for within the assumptions.

Traffic Impacts

Within the Supplementary Transport Assessment (STA), the Applicant has undertaken a sensitivity test of 6 locations modelled within the original Transport Assessment which will be subject to traffic management measures. These locations are as follows:

- Shuttle working traffic signals on the B2150 Hambledon Road between Soake Road and Closewood Road;
- Temporary traffic signal operation of the B2150 Hambledon Road / A3 Maurepas Way / Houghton Avenue roundabout in Waterlooville;
- Shuttle working traffic signals on the A3 London Road south of Forest End roundabout;
- Shuttle working traffic signals on the A3 London Road north of Ladybridge roundabout;
- Temporary traffic signal operation of the A3 London Road / Ladybridge roundabout; and
- Shuttle working traffic signals on the A3 London Road south of Ladybridge roundabout.

The purpose of the sensitivity test is to assume a more robust redistribution assessment within the SRTM which results in less traffic re-diverting away from Hambledon Road and the A3. Section 5.5.2.3 of the STA sets out the sensitivity test flows for each junction forming this assessment. The Highway Authority has reviewed the updated assessment and has the following comments to make.

Transport Assessment vs Supplementary Transport Assessment Results

In order to contextualise the sensitivity test results provided within the STA, a comparison has been undertaken against the original results shown within the TA for 'Do Something 1' Scenario where available. Summary tables for each junction are provided below:

Shuttle working traffic signals on the B2150 Hambledon Road between Soake Road and Closewood Road

		AM Peak			PM Peak		
		Deg Sat (%)	Mean Max Queue	Av. Delay (sec)	Deg Sat (%)	Mean Max Queue	Av. Delay per pcu (Sec)
Original TA							
	Northbound	N/A*	28.6	48.3	N/A	29.0	61.4
	Southbound	N/A	23.0	63.4	N/A	30.1	64.0
STA Assessment							
	Northbound	92.80%	36	65	104.6%	58	176
	Southbound	91.90%	29	75	103.4%	56	153

* In the context of the above and following tables, N/A stands for not available.

Shuttle working traffic signals on the A3 London Road south of Forest End roundabout

		AM Peak			PM Peak		
		Deg Sat (%)	Mean Max Queue	Av. Delay (sec)	Deg Sat (%)	Mean Max Queue	Av. Delay per pcu (Sec)
Original TA							
	Northbound	N/A	17.9	37.3	N/A	17.6	49.5
	Southbound	N/A	14.1	48.3	N/A	19.6	48.3
STA Assessment							
	Northbound	96.80%	33	77	100.00%	35	109
	Southbound	97.20%	28	92	99.70%	37	101

Shuttle working traffic signals on the A3 London Road north of Ladybridge roundabout

		AM Peak			PM Peak		
		Deg Sat (%)	Mean Max Queue	Av. Delay (sec)	Deg Sat (%)	Mean Max Queue	Av. Delay per pcu (Sec)
STA Assessment							
	Northbound	107.4%	52	214	107.4%	60.1	207
	Southbound	107.2%	65	196	107.2%	56.5	203
Original TA							
	Northbound	N/A	14.9	48.5	N/A	18.0	43.0
	Southbound	N/A	18.8	39.6	N/A	16.8	46.4

Shuttle working traffic signals on the A3 London Road south of Ladybridge roundabout

		AM Peak			PM Peak		
		Deg Sat (%)	Mean Max Queue	Av. Delay (sec)	Deg Sat (%)	Mean Max Queue	Av. Delay per pcu (Sec)
STA Assessment							
	Northbound	102.80%	43	143	109.0%	68	231
	Southbound	104.3%	49	158	108.6%	60	224
Original TA							
	Northbound	N/A	17.8	46.5	N/A	20.5	47.4
	Southbound	N/A	18.5	45.2	N/A	18.9	50.6

The sensitivity test results in the STA demonstrate that all of the links experience significantly longer queues and average delays when compared against those in the original TA under the DS1 scenarios. It is also noted that all of the links will be operating with degrees of saturation over 100%, indicating that they will be over capacity with the TM measures in place.

The junctions which have not been compared above includes the Hambledon Road/Houghton Avenue roundabout and the Ladybridge Roundabout. The former of these junctions will be over capacity in the AM and PM peak (Practical Reserve Capacity (PRC) of -10.6% and -12.4% respectively) with a maximum queue of 53 Passanger Car Unit's (PCU) (equal to 305 metres of queuing as per defined PCU length of 5.75m as set out within the Linsig User Guide 3.2, paragraph 4.29) on the A3 Maurepas Way E (right/U-turn/left/ahead) approach in the AM peak. The previous assessment within the TA forecast that the junction would operate within capacity with a PRC of 3.3% in the AM peak hour and PRC of 8.3% in the PM peak hour. The greatest forecast queue under the DS1 scenario occurred on the A3 Maurepas Way E (right/U-turn/left/ahead) again although the maximum queue was only 36.1 PCU's (208m). The 2026 DM scenario assessed the roundabout under current operation - without signals – which indicated that there will be a maximum Ration of Flow to Capacity (RFC) of 0.58, equating to a queue of 1.5 PCU's, on the A3 Maurepas Way E approach in the PM peak hour.

The results in the STA also demonstrate a severe impact at the Ladybridge Roundabout which will operate with a PRC of -29.6% in the AM peak hour and -30.6% in the PM peak hour. The worst affected arm of the roundabout will be the A3 London Road S approach in the PM peak hour where is a 100 PCU queue which equates to a circa 575m queue along the A3. The DS1 results in the original TA indicated that Ladybridge Roundabout would be operating with a PRC of 7.7% in the AM peak hour and a PRC of 10.3% in the PM peak hour. The greatest queue within this scenario would be present on the on the A3 London Road N approach in the AM peak hour with a 23.9 PCU (137m) queue. The 2026 DM scenario differs from the DS1 scenario as a result of the roundabout operating under a standard give-way arrangement, instead of the temporary traffic lights proposed as part of the traffic management. Under the DM scenario, the A3 London Road N approach operates over capacity in the PM peak hour with an RFC of 1.05 and a queue of 35.5 (204m) PCU's, this is also with the assumption that the capacity improvements from the Waterlooville MDA works have been implemented before works commence on the corridor. It is noted that the queue length is still substantially shorter than that observed within the sensitivity test results, however.

The sensitivity test undertaken within the STA focuses on the links which will be subject to TM during the construction period, meaning that no consideration has been given to the roads previously assessed within the SRTM which will be the subject of re-distributed traffic flows. However, it was noted that some roads received a significant increase in traffic flows through the re-distribution exercise. Most notably, Park Avenue in Purbrook was predicted to receive a 350% uplift in traffic flows in the PM peak hour and Mill Road in Purbrook would receive an increase in traffic of 317% in the AM peak hour. Across all of the roads forecast to receive the re-distributed traffic, there was an average increase of 169% in traffic flows across the peak hours. Whilst the sensitivity test assumes less traffic will utilise these roads, it is acknowledged that there will still be an increase in flows along each road and therefore a decrease in performance during the construction period.

The sensitivity test results, and previous re-distribution assessment, therefore, demonstrate that there will be a varying impact from moderate to major for highway users on the links noted above. Whilst it is noted that the road works are a temporary measure put in place to manage construction of the cable at certain points of the network, some of these measures will be in place for prolonged periods of time and the whole corridor will be impacted for the full 30 month construction period.

The updated FTMS sets out these time scales for the construction of different areas of the cable route. For example, sub-section 4.2 – B2150 Hambledon Road and A3 Maurepas Way between Milton Road (Waterlooville) and A3 London Road is predicted to require a 14 week period per circuit which means that traffic management measures will be in place for a prolonged period of time (28 weeks without any delays). Sub-section 4.32 – A3 London Road between south of the junction with Forest End (Waterlooville) and the southern end of the bus lanes is another section of the A3 which will require a 10+ week duration per circuit. This would also result in substantial delays of 109 seconds per PCU northbound along the A3 in the PM peak hour. HCC have requested an updated mitigation strategy from the Applicant to understand how the predicted delays can be reduced via clear strategies such as an enhanced area wide signage strategy and communication proposals. However, even if these measures can be secured to help mitigate the impact, there will still be a significant impact, in highway terms, on the travelling public and local residential population. The Highway Authority are therefore asking the Applicant to consider how impacts can be further mitigated to minimise disruption (such as with regards bus service mitigation, accident mitigation and suitable funding for HCC officers to appropriately manage the project from the public perspective).

Chapter 22 of the ES section 22.4.9.12 quantifies the magnitude of the traffic impact on the highway network under negligible, minor, moderate and major. 1.2.4 Section 4 of Chapter 22 notes the difference between the DM and DS severance along the A3 is low. This assessment has not been updated to take account of the sensitivity test undertaken within the STA., Based on the results of this assessment, the Highway Authority considers that the difference between the DM and STA severance is likely to move into the moderate/major category. The Applicant should update this assessment to take account of the revised assessment along Hambledon Road/A3. The assessment criteria for the Day Lane impacts is also not acceptable as it assumes that as the route is not congested it would not be severely impacted. However, based on the current traffic management proposals for Day Lane the Highway Authority could not agree to that assessment. Traffic under the current proposals could be disrupted for the majority of the day with lorry arrivals and departures under limited controls.

Following HCC's deadline 3 response, conversations have been held with the Applicant in relation to the issues raised to date and it has been requested that they update the proposed mitigation strategy. HCC would welcome further information and discussions with the Applicant to understand how the traffic impact will be mitigated and await receipt of a revised ES Chapter 22.

Accident Analysis

The Applicant has undertaken an additional analysis of accidents recorded and the Highway Authority are now content with the area covered by the assessment. It is noted that there have been a number of accidents within the area. The results have been shared with the Highway Authority's Safety Engineering team and it has been confirmed that there are no sites along the cable route, or assessed network, which require intervention at this time. It should be noted that there are a number of sites however which have previously been subject to safety engineering measures. It should also be noted that the traffic assessment undertaken within the original TA identifies that traffic will be redirected away from the A3 and B2150 and onto local roads which currently experience low level of traffic flows. Based on the original assessment, flows along these roads are forecast to increase between 130% and 350%. No evidence has been provided by the Applicant to demonstrate that the increase in flows would not lead to an increase in accidents. With a significant increase of traffic on rural roads, there comes an increase in risk of higher severity accidents occurring, as severity of accidents on rural roads is higher than on urban roads as reported by DfT (Reported Road casualties in GB in 2019).

The consequence of re-distributing traffic flows onto the rural roads of Newlands Lane (traffic flows increase by +220%), Belney Lane / Pigeon Lane (+146%), Closewood Road (+196%), Furzley Road (+201%) and Purbrook Heath Road (+243%) would be significant in terms of increasing accident severity. The STA states that in West Waterlooville, there were 3 collisions on Newlands Lane, 2 of which were serious. However, if traffic flows were to increase by 220%, then it would increase the risk of additional accidents occurring.

Overall, Table 18 of the STA shows that in the three areas affected by re-distributed traffic (West of Waterlooville, Waterlooville and East of Waterlooville) there were 122 'slight accidents' and 39 'serious accidents' in the most recent 5-year period. As a guide, based on a simple calculation of the average percentage increase in traffic flow of the roads presented in Table 60 (based on the highest peak hour increase in flow) compared to the base traffic flows then casualties could increase by 169%. This could result in an additional 84 'slight accidents' and 27 'serious accidents' over the 5-year period which could be classed under the 'major' category based on the Applicant's assessment within chapter 22 of the ES.

To ensure the continued safe operation of the highway, the Highway Authority wish to seek a commitment through the CTMP for the Applicant to work with the Highway Authority throughout construction in addressing accident trends through appropriate low cost measures such as signing and lining to mitigate any impact. For example, this may include signing of unsuitable routes if adopted by diverted traffic or additional warning signs to highlight the presence of vulnerable road users to unfamiliar drivers. The Highway Authority also welcome further consideration from the Applicant on any measures they can implement to reduce the risks of additional accidents.

Alternative Routes

Whilst the Highway Authority are proactively engaging with the Applicant to mitigate the impact of the proposed development, the ExA should appreciate that the impacts during the construction programme to the highway network are significant. Whilst mitigation strategies are being sought to reduce and manage this impact where possible, it will not be possible to completely remove delay and disruption to the local residential population, business and general road users on the route itself and in the surrounding area.

In this context, the Highway Authority notes the consideration of alternatives to the Applicant's preferred route, including the countryside route. Without prejudice to this wider debate, and from a Highway Authority perspective alone, it highlights the likely highway impacts in order to inform this debate.

Construction Environmental Management Plan

Discussions have been held with the Applicant regarding the Construction Environmental Management Plan (CEMP) in relation to arboricultural matters. The document has been reviewed by the Highway Authority in relation to the processes and protections provided within the document in relation to its arboricultural assets along the order limits of the corridor. The following comments are made on the CEMP:

- Paragraph 5.2.1.1 states that a number of measures will be considered during construction works to ensure protection of the existing landscape setting and views to the construction site. This is felt to be too weak a position and should set out that measures **must** be considered.
- 5.3.1.1 should also include "Highway trees will only be removed as a last resort, subject to approval from HCC Arboriculture and with agreement on compensation values for each highway tree prior to its removal.
- 5.3.4.3 requires amendment to reflect the Highway Authority's policy on replacement tree planting. The Highway Authority will replant highway trees in the highway where it deems it appropriate and on receipt of the CAVAT compensation monies. Hedgerow trees are normally outside of the highway and are therefore the responsibility of the adjacent landowner. Private hedges and/or hedgerow trees will not be replaced with mitigation planting into the highway, regardless of the position on the Onshore Cable Route and/or the Order Limits. To confirm the reinstatement requirements upon completion of the works, the Applicant should undertake pre-commencement and post completion condition surveys of the road in the vicinity of the temporary access.
- 6.2.2.1 must include the following: "Highway trees will only be removed as a last resort, subject to approval from HCC Arboriculture and with agreement on compensation values for each highway tree prior to its removal.
- 6.2.4.1 the 18th bullet point relates to mitigation planting for lost hedgerows and trees. As above this must include that there will be no third-party tree planting within the highway without express permission from the Highway

Authority. HCC Arboriculture will undertake any highway tree mitigation planting required, to be funded from the highway tree compensation monies.

Arboriculture Method Statements

The Highway Authority are waiting an updated arboriculture method statement to reflect the required amendments as set out within its deadline 3 response. This has not been provided to date. The updated document should also reflect its required position on how assessments of trees should be undertaken and the methodology for compensation payments as set out above.

Workplace Travel Plan

It is noted that a workplace travel plan has been submitted and discussions regarding appropriate mitigation measures have been held with the Applicant. The Highway Authority have further reviewed the travel plan and its proposed measures to limit the traffic impacts of the development. It is appreciated that there are significant numbers of unknowns with the way the site will operate. It is agreed that construction workers will park at the main Lovedean site with onward travel to work areas along the corridor as required. The proposed travel plan sets out proposals for restrictions on contractor parking on the site through a permit scheme to encourage car sharing, this measure is welcomed. They also commit to the provision of a travel plan coordinator and advertising of sustainable travel methods. Also included is provision for a shuttle bus to run from the site to Havant Railway Station. Given the unknowns for worker home or living accommodation it is difficult to know whether this will be a truly meaningful measure. As the primary measure to reduce trips to the site, there are concerns that the travel plan provides no flexibility or alternative measures should the measures identified not be a practical option. It is therefore suggested that additional measures are added to create a shopping list of improvements that can be utilised by the contractor when writing the full workplace travel plan. Suggestions for inclusion are:

- That the shuttle bus operation is more flexible to determine its collection point or points once the work force locations are known.
- Provision of cycle hire scheme
- Provision of cycle vouchers
- Provision of cycle training if necessary
- Bike repair station
- Motorcycle parking
- Taxi offer as alternative to car sharing
- Provision of subsidised or paid for travel on public transport and appropriate provision to access the site from Havant Station or the bus stops on Lovedean Lane.
- Provision of cycle parking on site
- Financial incentives for staff car sharing
- Off site park and ride facilities either from public car parks or privately secured provision.

To ensure appropriate measures are secured, mapping of the workers' home or accommodation bases should be undertaken so there is a good understanding of the available sustainable travel options for travel. This should inform the formulation of the full travel plan and allow selection of appropriate measures to meet the proposed targets.

Approval of the travel plan will be required prior to commencement on site. This should be submitted to the Highway Authority 2 months prior to commencement to allow appropriate approvals and amendments if necessary. This would be subject to a £1500 approval fee which should be secured through the relevant legal mechanism.

HCC would need to monitor the travel plan to ensure that measures are being implemented and effective. This will include reviewing information submitted in accordance with the travel plan, and engaging with the travel plan coordinator on matters, including if HCC are in receipt of complaints regarding construction worker traffic. HCC's current policy for a development of this scale requires a payment of £3000 per annum to cover the costs of monitoring. Again, this should be secured through the appropriate legal mechanism. Given the unique nature and type of project, the travel plan should set out a more flexible monitoring process for the site with greater emphasis on collaborative working with the Highway Authority, and an ongoing review and monitoring process to enable the effectiveness of the measures to be considered and allow flexibility of the measures being applied in response.

Finally, is the matter of surety. HCC usually require a surety for the travel plan to enable the Highway Authority to implement measures should developers fail to deliver on the travel plan requirements. These however are usually secured for applications with impacts of a permanent nature. It is acknowledged that the travel plan is of vital importance to reducing the impact of construction traffic in the Lovedean area. It is however also acknowledged that the ability to mitigate these impacts sits solely with the Applicant and their contractor. The Highway Authority has limited ability to deliver meaningful measures such as personal travel planning or physical improvements which could mitigate the impact of the development during the construction period, should the Applicant fail to meet the required standard or deliver on the travel plan. It is also acknowledged that as a high profile scheme secured through a DCO there is significant legal weight in the process requiring the Applicant to comply with the requirements and appropriate measures in place for enforcement should the Applicant not comply. Therefore, HCC in this bespoke instance are prepared to waiver the need for a surety on the travel plan, subject to appropriate protections within the DCO. It is also suggested that this is contractually secured with the appointment contractor and reference to this requirement made within the framework travel plan.

Outstanding Highway Matters To Be Addressed By Applicant

Whist the Highway Authority have met with the Applicant and discussed progress on matters from the deadline 3 response the Highway Authority are waiting updated documents in light of these discussions before being able to move any matters further forward. The Statement of Common Ground has been updated to reflect all

outstanding issues and the current position on these matters. The Highway Authority are waiting receipt of the following documents:

- Updated FTMS to reflect HCC comments and discussions from deadline 3
- Updated CTMP to reflect HCC comments and discussion from deadline 3
- Updated CEMP to reflect HCC comments and discussions to date and included within this response
- Updated Travel Plan to reflect HCC comments and discussions to date and included within this response
- Updated Arb Method Statement to reflect HCC comments and discussions to date and included within this response
- Updated dDCO to reflect Aquind's understanding of matters agreed and progressed to date including the permit scheme and s278 matters.
- Updated ES Chapter 22 to include setting out a clear mitigation strategy for the development.

Lead Local Flood Authority Update

Infiltration test results

HCC, in its role as Lead Local Flood Authority (LLFA), note that Aquind have now undertaken infiltration tests and also provided more detail on the filter material that will be used as a treatment mechanism within the basins. The limiting factor is the filter material, as opposed to the underlying chalk, but providing the filtration material has an infiltration rate of 4 x 10-6 or better then the drainage in its current format would function appropriately. The calculations have been re-run based on these values and while the ½ drain down time is high for the 1:100 + 40% flood risk, the capacity of the basins are considered to be sufficient.

The design has been undertaken using source control which LLFA consider is appropriate for this stage in the process. However, more detailed information will be required from the contractor as the design progresses. This is in accordance with the requirements stated in the DCO under Schedule 2 Section 12 (subject to agreement of the wording of this paragraph as detailed in the SoCG 4.14.3.1).