



AQUIND Limited

AQUIND INTERCONNECTOR

Applicant's Response to Submissions made at
Open Floor Hearings

The Planning Act 2008

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WSP

WSP House

70 Chancery Lane

London

WC2A 1AF

+44 20 7314 5000

www.wsp.com

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Prepared By	Ursula Stevenson
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Approved By	Amy Hallam
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1. INTRODUCTION

- 1.1.1.1. On 14 November 2019, 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 ‘Act’) to the Secretary of State (‘SoS’) (the ‘Application’).
- 1.1.1.2. The Application was accepted by the Planning Inspectorate (‘PINS’) on 12 December 2019, with the examination of the Application commencing on 8 September 2020.
- 1.1.1.3. This document has been prepared following the Open Floor Hearings that took place in relation to the Application on the days and times below:
- Open Floor Hearing 1 (‘OFH1’) on Monday 7 December 2020 at 09:30; and
 - Open Floor Hearing 2 (‘OFH2’) on Monday 7 December 2020 at 18:30.
- 1.1.1.4. The Applicant was represented at OFH1 and OFH2 by Simon Bird QC of Francis Taylor Building and Martyn Jarvis, Senior Associate of Herbert Smith Freehills LLP.
- 1.1.1.5. A number of the matters raised at OFH1 and OFH2 have been raised previously within the relevant representations and/or written representations made by Interested Parties during the examination. As a result, a number of these matters have been addressed by the Applicant and cross references to the relevant responses have been provided. Where new matters have been raised, these have been addressed specifically.
- 1.1.1.6. This document is structured as follows:
- Table 1 sets out the Applicant’s response to the submissions made at OFH1; and
 - Table 2 sets out the Applicant’s response to the submissions made at OFH2.

Table 1.1 - Applicant's Response to Submissions made at OFH1

Key concerns raised in oral and written representations	Applicant's response
Ian McGuire – Portsmouth City Council ('PCC') (REP5-090)	
<p>1. Procedural and Legal Issues (paras 1 – 8)</p> <ul style="list-style-type: none"> a. Lack of information and concerns about uncertainties and changes as the examination progress (oral submission) b. Portsmouth not appropriate location (oral submission) c. dDCO powers interfere with public rights and seek to limit development potential of land (paras 9 - 11) d. The Applicant has unjustifiably sought broad powers and flexibility through this DCO (paras 12 – 17) e. The Applicant failed to make any meaningful efforts to negotiate with PCC with regard to acquisition and other issues (para 18) f. Concerns around financial viability (para 19 and 22) and financing of the scheme (oral submission) 	<p>a. The Applicant has complied with all pre-application requirements and has engaged proactively and constructively with PCC throughout the pre-application and examination stages. Please refer to the response to REP5-141 below (point 8) which provides an overview of the comprehensive consultation carried out by the Applicant.</p> <p>b. Each element of the scheme is the product of an extensive optioneering process. As required by the Infrastructure Planning Environmental Impact Assessment (EIA) Regulations 2017, the Environmental Statement (ES) sets out the alternatives considered by the Applicant and the reasons why the Proposed Development was chosen (ES Chapter 2 Consideration of Alternatives (APP-117) and the Supplementary Alternatives Chapter, Appendix 3 of ES Addendum (REP1-152)). Additional detail surrounding the chronology of option selection, including in relation to the elements of the Proposed Development in Portsmouth, is detailed within the Applicant's Transcript of Oral Submissions for Compulsory Acquisition Hearing1 (REP5-034), with specific reference to questions 9.1, 9.2 and 9.3.</p> <p>The Applicant has thoroughly considered and balanced the relevant considerations in relation to the alternatives studied, guided by the relevant policy requirements, and reached reasonable and logical conclusions. Whilst it is not incumbent on the Applicant to show that the project represents the best option from the alternatives considered, the Applicant is of the view that, when all relevant considerations are fairly balances, it has selected the optimum final option.</p> <p>c. The dDCO powers do not unjustifiably interfere with public rights and the Applicant will seek to choose the least impactful route to ensure that any impacts on the development potential of land are minimised as far as possible.</p> <p>d. & e. The justification for the proposed powers to acquire land and rights and why there is a compelling case in the public interest given the national significance of the Proposed Development is all explained in the Statement of Reasons (APP-022).</p> <p>The location and extent of the Onshore Cable Corridor has been carefully considered and designed to optimise the route so as to cause as little disruption as possible and to affect the minimum of land possible (ExA WQ CA 1.3.30, REP-091) and to minimise sterilisation of undeveloped land in the future.</p> <p>The Order Limits provide for limits of deviation and the need for this flexibility is set out in the Statement of Reasons at Section 5. The extent of the land acquired or over which rights will be acquired will only be so much of the land within the limits of deviation as is required for the construction, operation and maintenance of the permitted development (Article 23). Therefore, before any land or rights are acquired, a test of necessity must be satisfied. Detailed design must be confirmed under Requirement 6 and the development must be constructed in accordance with the approved details.</p> <p>Examples of other comparable DCOs were provided in REP 1-091 response to ExA WQ CA 1.3.17.</p> <p>The Applicant has been engaging with PCC on a wide range of matters including land acquisition since April 2017 and it looks forward to further progress on those negotiations as the Examination progresses.</p>

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	<p>f. The Applicant has demonstrated that the project is independently viable and that funding for the Proposed Development is likely to be available within the required timeframe (Funding Statement APP-023 and Response to ExQ CA 1.3.1 REP 1-021).</p> <p>The costs estimates are considered to be accurate and present a realistic understanding of the likely overall costs. They have been informed by extensive industry and contractor engagement to provide the required level of certainty for the project at this stage.</p> <p>Whilst the Proposed Development does not presently have the benefit of full funding, that is entirely normal where securing funding is dependent on the making of a DCO.</p> <p>The Proposed Development is not reliant on revenues from the commercial use of the Fibre Optic Cable (FOC) (see response to ExQ CA 1.3.3).</p>
<p>2. Fibre optic cable. Two specific areas of concern raised in PCC's letter dated 23 November 2020 (REP5-084):</p> <ul style="list-style-type: none"> a. Whether the fibre optic cables and associated infrastructure can properly amount to associated development as a matter of law. b. Consequence of the Project no longer being listed as a PCI pursuant to the TEN E Regulations 	<ul style="list-style-type: none"> a. The Applicant has confirmed its position on why the commercial use of the spare capacity within the fibre optic cables required for the operation of the Proposed Development, and the additional elements of the development required in connection with that use, is associated development in accordance with Section 115 of the Planning Act 2008 and how such associated development complies with the relevant guidance provided in this regard within the Statement in Relation to FOC (REP1-127). b. The status of Project of Common Interest, whilst a nice attribute, does not have any material impact on the development of the project or indeed any impact on the regulatory status that the Applicant is pursuing with ACER. <p>Please also refer to the Applicant's hearing transcript for Compulsory Acquisition Hearing 1 (REP5-034), and the post hearing summary and updated Funding Statement submitted at Deadline 6.</p>
<p>3. Compulsory Acquisition</p> <ul style="list-style-type: none"> a. The Order Limits cover more land than needed and no compelling case (oral submission) b. Failure to show that all reasonable alternatives to compulsory acquisition have been explored and compelling case in public interest to justify compulsory acquisition (paras 20 – 21) c. Lack of genuine consultation and due diligence in respect of proposed land take (oral submission) 	<ul style="list-style-type: none"> a. See 1d above. b. See 1b above. c. Please refer to the response to REP5-141 below (point 8) which provides an overview of the comprehensive consultation carried out by the Applicant.
<p>4. Traffic and Transport (paras 23 – 33)</p> <ul style="list-style-type: none"> a. Harm to highway network (oral submission) b. Adverse traffic management – oral submission c. Significant effects (paras 23 – 25) d. The number and location of joint bays for the cabling are still unknown (para 26) 	<ul style="list-style-type: none"> a. The Applicant recognises that development of the scale proposed may have significant impacts for local people, particularly those living close to the Order Limits. It has considered and reflected on the responses from all those involved in the consultation processes and in the Examination and has and continues to take all individual views expressed carefully into account. Where possible, it has adjusted the plans to reflect the knowledge of the local area and it has welcomed the ability to scope and improve the proposals which this engagement has offered and continues to offer. See further responses below regarding impacts on the highway network.

Key concerns raised in oral and written representations	Applicant's response
<p>e. Concerns with Traffic Modelling and allegation that it does not replicate “worst case scenario” (para 27 - 29)</p> <p>f. Mitigation - Suggestion for funding to bring forward proposals for increased capacity in the Park and Ride at Tipner earlier (para 30)</p> <p>g. Clash with works proposed as part of Transforming Cities Fund (para 31)</p> <p>h. Objection to any deviation from or disapplication of the NRSWA 1999 and TRO Powers (paras 32 – 33).</p>	<p>b. and c. The Transport Assessment (Appendix 22.1 of the ES) (APP-448) and Supplementary Transport Assessment (REP1-142) have assessed the impacts of the Proposed Development on the transport network. The effects of the Onshore Cable Corridor temporary works have been carefully considered and the changes to the operation of the highway network are temporary with the highway network returning to normal levels of operation following the completion of the works.</p> <p>The Applicant concludes in both assessments that there will be localised areas on the highway network that experience an increase in traffic levels and associated congestion as a result of the construction of the Proposed Development. However, any impacts are temporary in nature and will be mitigated through measures set out within the Framework Traffic Management Strategy (FTMS) (REP1-068) and Framework Construction Traffic Management Plan (FCTMP) (REP1-070) (which were both updated and submitted at Deadline 1 and are secured by Requirements 19 and 17 respectively of the dDCO (REP1-021)).</p> <p>d. In relation to the particular issue of joint bays of which there will be a maximum of 25 per circuit, the precise and definitive location is a matter for detailed design, however, the intention is that these will be sited off the carriageway of the highway where practicable with this secured in the updated Onshore Outline Construction Environmental Management Plan (OOCEMP) (REP4-005) (CB-24). In addition, the Applicant is currently completing work which will be submitted at Deadline 6 which will provide further details on the indicative location of Joint Bays and a confirmation of the constructability of such in these locations (document reference 7.9.26).</p> <p>e. The approach taken within the Transport Assessment (TA) (APP-448), including the scope of the SRTM modelling undertaken, was agreed with PCC in scoping discussions undertaken pre-submission at a meeting held on 03/07/19. As was agreed with both PCC and Hampshire County Council (HCC), the SRTM modelling undertaken is representative of a worst-case scenario. Further to additional requests raised by PCC in their relevant representation (RR-185), additional assessments of the impact of works on the A2030 Eastern Road between Tangier Road and Eastern Avenue have been completed and are included in the Eastern Road Traffic Assessment Technical Note which is included in Appendix E, and summarised in Section 5.4 of the Supplementary Transport Assessment (REP1-142).</p> <p>The review of baseline traffic data completed within the Eastern Road Technical Note has shown that observed traffic flows and volume to capacity ratios on the A2030 Eastern Road within the Order Limits are highest at the location which will be the most impacted by the proposed traffic management, between Airport Service Road and Burrfields Road. In the context of observed traffic flows, it can therefore be confirmed that the TA has assessed the worst-case scenario for the A2030 Eastern Road, through the inclusion in the SRTM of traffic management located between Airport Service Road and Burrfields Road. Please also refer to the Applicant's Hearing Transcript for Issue Specific Hearing 3 (REP5-069) and the post hearing notes submitted at Deadline 6 (document reference 7.9.22).</p>

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	<p>f. The necessary mitigation for the Proposed Development has been extensively and robustly assessed and will be secured through the FTMS (REP1-068) and the FCTMP (REP1-070). The mitigation includes a strategy governing access to properties and communication to residents (Onshore Cable Route Construction Impacts on Access to Properties and Car Parking and Communication Strategy Appx 1 to).</p> <p>Furthermore, as the construction period is temporary, the Applicant considers that providing funding for permanent schemes such and Park and Ride to offset temporary impacts is disproportionate.</p> <p>The Onshore Cable Corridor and construction programme have been developed in consultation with PCC to take account of environmental constraints and where practicable public events and school terms.</p> <p>The FCTMP includes details of permitted vehicle routing and timings, temporary site access requirements, management of road safety and how each detailed Construction Traffic Management Plan be implemented and monitored. Details of the traffic management for each phase of construction will be provided prior to commencement of that phase and require approval.</p> <p>Pedestrian and cycle routes along the Onshore Cable Route will be maintained wherever possible during the works and in all cases construction work will ensure that pedestrians and cyclists can pass in a safe manner. Particular attention has and will continue to be given to those with visual or mobility impairments to ensure that their safety and free movement is maintained.</p> <p>g. The Applicant is aware that PCC has recently secured funding from the Transforming Cities Fund (TCF) towards the introduction of transport improvement schemes and will seek to work with PCC so that the delivery of the Proposed Development is co-ordinated with the TCF works, taking into account the programme mitigations provided for within the FTMS and the need to deliver the works efficiently so as to minimise impacts.</p> <p>h. The Applicant's position with regard to the application of the New Roads and Street Works Act is explained in the Highway Subsoil Acquisition Position Statement (REP1-131). Where the Proposed Development is situated in land which is vested in the highway authority, the statutory framework provided by the New Roads and Street Works Act 1991 is to be relied upon for the purposes of installation and the continued presence of the Proposed Development thereafter for the purposes of operation. Where the authorised development is laid at a depth such that it is in land that does not form the highway, the acquisition of the necessary rights over that subsoil land is sought.</p>
<p>5. Air Quality Implications (para 34)</p>	<p>The AQ assessment undertaken (ES Chapter 23, REP 1-033) has followed best practice, utilising appropriate vehicle emissions datasets and traffic data outputs from the validated Solent Sub-Regional Transport Model. The assessment is inherently conservative because the emissions reductions which will be realised through the implementation of the Clean</p>

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	<p>Air Zone from 2021 are not represented. Congestion is represented through the slowing of traffic on the approach to junctions during traffic management interventions.</p> <p>The results indicate some slight beneficial and adverse significant effects on local air quality as a result of the construction related traffic emissions. However, no new exceedances are predicted as a result of the project that do not already exist. The impacts associated with diversions, road closures and construction traffic impacts are transitory and temporary in nature and are not predicted to impact on the ability of PCC to meet its obligations under the EU Ambient Air Quality Directive 2008/50/EC. No significant effects are predicted for non-construction traffic related emissions.</p> <p>Air emissions will be minimised on Eastern Road through the scheduling of diversions and closures for summer holidays outside the football season when traffic flows are at their lowest. The execution of a communications strategy is also built into the traffic model predictions which will serve to raise public awareness of disruption and reduce the likelihood of unexpected congestion peaks where air emissions can be elevated.</p> <p>Furthermore, the OOCEMP (REP5-019) provides for local air quality and dust mitigation measures to be implemented in accordance with IAQM best practice guidelines and each phase of onshore development will have to comply with a CEMP in relation to that phase.</p>
<p>6. Surface Water Resources and Flood Risk – application of Sequential Test to ORS (paras 35 – 36)</p>	<p>The Flood Risk Assessment (APP-439), includes an assessment methodology including consideration of climate change, on and off-site impacts and proposed mitigations relevant to the flood risk environment. The Applicant agrees that the FRA (APP-439) required updating following a change in Flood Zone from 2 to 3 at the ORS location. The Flood Risk Assessment (APP-439) is now supplemented by the Flood Risk Assessment Addendum (REP1-157), of which the assessment methodology including updated consideration of climate change, on and off-site impacts and proposed mitigations relevant to the tidal environment, which is supported by the EA.</p> <p>Existing and updated inbuilt design measures, namely ORS surface water management and ORS tidal flood management alongside other mitigation measures are included within the Design and Access Statement (REP1-031) and OOCEMP (REP1-034). Requirement 15 (Construction Environmental Management Plan) of the draft DCO (REP1-021) requires the submission of a Construction Environmental Management Plan, in accordance with the OOCEMP (REP1-034), and Requirement 6 (Detailed design approval) of the draft DCO (REP1-021) requires the design of the Proposed Development to be in accordance with the Flood Risk Assessment measures, therefore securing the principles within the Flood Risk Assessment.</p> <p>Following a change in Flood Zone from 2 to 3 at the ORS location, a Sequential and Exception Test Addendum (REP1-158) has been prepared and submitted at Deadline 1 to demonstrate that the requirements of the sequential and exception test have been met.</p> <p>The updates to the Sequential Test Addendum and Flood Risk Assessment Addendum were discussed with Portsmouth City Council Lead Local Flood Authority (LLFA) during a meeting on 26 November 2020, following the meeting PCC LLFA confirmed by email that the Sequential Test Addendum and Flood Risk Assessment Addendum are accepted. The Applicant will update this agreement within the Statement of Common Ground once this has formally been confirmed with PCC's planning team.</p>

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<p>7. Heritage design and archaeological concerns (paras 37 – 41), including in respect of Fort Cumberland</p>	<p>Please refer to the Applicant's responses to comments made at Deadline 4 which has been submitted at Deadline 6 (document reference 7.9.23,70-78 & 81).</p> <p>The Applicant considers the impact to the significance of Fort Cumberland is negligible in respect of views from the western ravelin, based on the distance from the asset and the presence of a modern residential housing estate, located 15m to the north-west of the proposed ORS compound. The site of the proposed Optical Regeneration Station (ORS) compound is currently in use as a car park. The Applicant considers that the landward view from the western ravelin has been substantially altered since the construction of a 1960s housing estate (located 15m north of the Proposed Development) and 20th century motor shed adjacent to the north, along with the presence of the existing car park.</p> <p>The proposed ORS would be significantly lower in height than the current housing estate, and when seen against the background of the surrounding residential development would not be visually intrusive. Taken overall, the ORS would not have a significant impact on how the asset (when taken as a whole) is appreciated and understood.</p>
<p>8. Impacts on trees (paras 42 – 48)</p>	<p>The Applicant has undertaken a Tree Survey in accordance with BS 5837:2012 and will seek to avoid all impacts on trees where possible. It has made some amendments to the Order Limits to reduce the effect on trees in PCC's jurisdiction at Baffins Milton Rovers Football Club, Furze Lane and Zetland Fields.</p> <p>The Applicant will only remove trees of high/medium value where their loss is unavoidable i.e. where the tree is impacted to such an extent that its physiological viability and/or structural integrity is significantly diminished such that long-term retention does not accord with arboricultural best practice. Retention or loss will be decided by a suitably trained and qualified arboriculturalist and confirmed in consultation with PCC through the requirements of the Arboricultural Method Statement (secured through Requirement 15 of the dDCO (REP5-008)). In the detailed design of the Onshore Cable Corridor, the OOCEMP requires that the positioning of cables within the root protection areas of trees is avoided where practicable. Trees removed will either be replaced or, if the authorities prefer, funding of replacement tree planting will be provided. This is an issue on which discussions continue.</p> <p>Please also refer to the Applicant's post hearing notes submitted at Deadline 6.</p>
<p>9. Socio-Economics/Human Health (paras 49 – 59)</p> <ul style="list-style-type: none"> a. Sports Pitches – Langstone and Farlington playing fields; insufficient mitigation and long period of uncertainty subject to naïve assumptions – oral submission. b. Loss of sports pitches with no mitigation in place c. Query whether the timing/duration of recognises non-availability during overwintering periods (1st October to 31st March). d. Mitigation for 'Victorious Festival' 	<p>a. and b. The Applicant has, in the scheme design, sought to avoid greenspaces and recreational facilities wherever possible and it has made use of Horizontal Directional Drilling (HDD) where it can to avoid such impacts e.g. Milton Locks Nature Reserve, Milton Allotments, Eastney Beach. Where possible, it has also sought to avoid playing surfaces where open space needs to be crossed. The Applicant also committed not to install joint bays on sports pitches.</p> <p>The Applicant recognises that there will be some impacts and these are assessed in the ES (Chapter 25, APP-140) with appropriate mitigation proposed. This includes the Framework Management Plan for Recreational Impacts (REP-1-44). The Applicant continues to discuss the mitigation proposals to further reduce the identified significant residual impacts.</p> <p>At Farlington Playing Fields, the impact would be on 4 football pitches and one disused cricket pitch over a non-continuous 52-week period, followed by reinstatement. The Applicant has also proposed that two of the affected pitches are relocated within Farlington Fields to reduce the impact to a remaining two pitches. In terms of the car park serving</p>

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	<p>the playing fields, a small area would be required for a two-week period for laydown purposes leaving 100 spaces available (see Appendix A of the Framework Construction Traffic Management Plan (REP1-070)).</p> <p>At Langstone Harbour, the timing of the works aims to minimise impacts on football pitches and avoid the adjacent Baffins Milton Rovers playing season but accepts that this means that there is an impact on the cricket season.</p> <p>c. Reinstatement for use by sports teams is different in terms of requirements to reinstatement for use by birds foraging. All grassland within the Farlington Playing Fields SWBGS site will be restored to its previous grazeable condition during the month of October.</p> <p>d. With the exception of the HDD-4 Compound, the playing fields would be cleared of temporary works for the duration of the Victorious camping festival. The Applicant is seeking to engage with PCC regarding impacts on the Victorious Festival and what mitigation could be applied.</p>
<p>10.Impacts on allotments (paras 18 and 58)</p> <p>a. Insufficient mitigation for allotment holders (Oral submission)</p> <p>b. Request for CA Hearing in Feb for allotment holders (oral submission)</p>	<p>a. The Applicant's proposal has always been that the cables would be installed under the allotments through the use of HDD so as to avoid any surface impacts over the allotments. That would be secured by the DCO (see HDD Position Statement Note REP1-132).</p> <p>It has also been confirmed through updates to the Land Plans (REP1-011a) and the Book of Reference (REP4-003) that the only rights sought over the Allotments are a right of access on foot over the existing paths only for the undertaking of visual inspections during construction to allow for checks to be made for any bentonite (a CEFAS approved non-toxic clay lubricant) breakout associated with the HDD works, and rights to temporarily access the Allotment plots for the purpose of clearing any such bentonite breakout (in the unlikely event that occurs).</p> <p>There would no restriction on access for allotment holders, or removal of their plots or structures (see REP 1-011 Sheet 10 of 10). To ensure that this is absolutely clear, the Applicant has made amendments to the Land Plans, Book of Reference and Works Plans.</p> <p>b. N/A</p>
<p>11.Ground conditions/contamination (paras 60 – 64)</p>	<p>The findings of the ground investigation coupled with the assessments of the EIA specialists support the feasibility of construction of the project without significant environmental effects (ES Chapter18, Ground Conditions, APP-133). The ground investigations provided general coverage of the Onshore Cable Corridor as well as targeting areas of historic contamination. The scoping for the investigation was informed by a robust data set which included publicly available data and, on site, additional exploratory locations were surveyed to target any areas of contamination which were not evident or present during initial scoping (Response to ExQ REP2-008).</p> <p>However, there is a need to retain optionality at Milton Common location for reasons which are explained in Applicant's Transcript of Oral Submissions for Compulsory Acquisition Hearing 1 (REP5-034).</p> <p>Mitigation measures specific to Milton Common are outlined in the OOCEMP and with use of standard brownfield construction methods, exportation and disposal of contaminated material conducted to industry standard procedures and adherence to approved methods of managing and mitigating for the creation of potential pollution pathways, there will be no significant effects.</p>

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<p>12. Onshore Ecology (paras 65 – 66)</p> <p>a. Ecology and bats and reptile habitats – oral submission</p> <p>b. Protected Birds – oral submission</p>	<p>a & b. Extensive consideration has been given to the effects of the proposed development on ecological receptors including protected species such as bats, reptiles and breeding birds (ES Chapter 16 Onshore Ecology, APP-131). No residual significant effects have been identified.</p> <p>Where a potential effect has been identified, the approach has been to seek to avoid that effect and, where that is not possible, to mitigate it. A key benefit of the scheme is that, where possible, it is routed through roads to avoid effects on habitats and the scheme design includes the use of HDD to cross beneath sensitive receptors such as the Denmead Meadows Site of Importance for Nature Conservation (SINC). The OOCEMP (REP5—019) requires the avoidance of high and medium value features where practicable.</p> <p>The Applicant is also committed to habitat creation through the Outline Landscape and Biodiversity Strategy and the Proposed Development will deliver a net gain for all habitats of principal importance i.e. priority habitats.</p> <p>In relation to the relevant European Designated Sites and Marine Protection Areas, both Natural England (NE) and the Marine Management Organisation (MMO) are satisfied that, with the mitigation proposed, there would be no adverse effect on their integrity. Very careful consideration has been given to the Chichester & Langstone Harbour Special Protection Area (SPA) and the inter-tidal bird community and to Brent Geese. By avoiding works on the relevant sections of the Onshore Cable Corridor within the Winter season (October to March) any adverse effects can be avoided. For details see the Winter Working Restriction for Features of Chichester & Langstone Harbour SPA (APP-422).</p> <p>In relation to Langstone Harbour Site of Special Scientific Interest (SSSI), direct impacts have been avoided through the use of HDD and no indirect effects would be perceptible above the background effects associated with the existing use of the Harbour.</p>
<p>13. Impact on Coastal Flood Defences (paras 67 – 72)</p>	<p>The Applicant can clarify that Horizontal Directional Drilling (HDD) will be used to avoid any impact on the bund of the coastal flood defences.</p> <p>The Applicant has liaised with the East Solent Coastal Partnership (ESCP) to ensure that the Proposed Development and the North Portsea Island Coastal Defence Scheme progress in a mutually compatible way. The Proposed Development avoids all but one of the existing or proposed coastal flood defence alignments and the sole point of interaction is that coincides with an HDD-6 section and which is acceptable to ESCP.</p>
<p>14. Cumulative Effects (paras 73 – 77)</p> <p>a. Coastal Defence Schemes for Portsea Island</p> <p>b. Southsea Sea Defence project</p>	<p>a). The Applicant has liaised with the East Solent Coastal Partnership to ensure that the Proposed Development and the North Portsea Island Coastal Defence Scheme progress in a mutually compatible way. The Proposed development avoids all but one of the existing or proposed coastal flood defence alignments and the sole point of interaction is that which coincides with an HDD-6 section and which is acceptable to ESCP.</p> <p>b) The Southsea Defences were considered for cumulative effects within the ES (Item 74, APP-485). The Onshore Ecology cumulative effects assessment screens the project out as there is no interaction between projects on ecological receptors (Appendix 16.15, APP-423). However, significant effects were identified for use of materials for construction of both projects and are summarised in the Chapter 29 – Cumulative Effects (APP-144).</p>

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Councillor Matthew Winnington (REP5-133)	
<p>1. Disruption caused by HDD – noted it will cause disruption and have a detrimental impact on beach users and Southsea Leisure Park users.</p>	<p>The Applicant can advise that the HDD compound is proposed to be located within the Fort Cumberland Road Car park. There will be no drilling nor cabling related activities on the beach. Therefore, beach users and Southsea Leisure Park users are not going to be impacted.</p>
<p>2. Impacts on Henderson Road, Ferry Road and Fort Cumberland Road junction:</p> <ul style="list-style-type: none"> a. If the Ferry Road access is blocked, that means everyone will have their vehicle access disrupted and people will be unable to get in and out quickly. It is a route to the ferry so will stop people getting to ferry. b. Detrimental impact on lifeboat station where any crew living to the West may be delayed, leading to delays in lifeboats being launched. c. It will also cause delays to the public transport network. d. The junction is adjacent to Sense Plus learning disability day centre. 	<ul style="list-style-type: none"> a. The Applicant notes that there are two different sections of Ferry Road which will be impacted by construction of the Onshore Cable Route. Therefore, a response to the impact on each section is provided separately below. The Applicant can advise that access to Ferry Road at the junction of Ferry Road / Fort Cumberland Road will be retained at all times. As is set out in paragraph 12.2.1.2 of the Framework Traffic Management Strategy (FTMS) (REP1-068), temporary traffic signals / or road plating will be used to retain access to this side road. Access to Ferry Road to the east of Fort Cumberland Road and car park will have access retained at all times as installation of the Onshore Cable Route on Fort Cumberland Road is to be facilitated through use of shuttle working traffic signals. This is also defined in paragraph 12.2.1.2 of the FTMS. b. The Lifeboat Station has been given careful consideration by the Applicant to ensure access is available at all times. This is addressed in sections 2.14 and 12.2 of the FTMS (REP1-068). As stated above, access will be maintained to the Lifeboat Station at all times as the construction of the Onshore Cable Route will be facilitated through shuttle working traffic signals and will not require a full road closure. Assessments of shuttle working traffic signals on Henderson Road (where traffic flows are higher than Fort Cumberland Road) contained within the Transport Assessment (APP-448) and Supplementary Transport Assessment (REP1-142) has shown that the average delay times at these signals would be less than 60 seconds in the AM and PM peak periods. c. Based upon the assessment of shuttle working traffic signals quoted above, the impact on public transport routes using Fort Cumberland Road and Ferry Road will be minor. d. The junction of Fort Cumberland Road / Ferry Road will be provided with temporary traffic signals or road plating during construction of the Onshore Cable Route as stated in paragraph 12.2.1.2 of the FTMS (REP1-068), thereby maintaining access through this junction at all time. Whilst the access to Sense Plus Day Centre is included in the Order Limits, it is unlikely that the final route alignment of the Onshore Cable will cross in front of this access. In the unlikely event that the final route alignment does cross in front of this access, road plating will be used to ensure vehicular access is maintained at all times given the care provided for people with learning disabilities at this location. To secure this provision an update will be made to the Onshore Cable Route Construction Impacts on Access to Properties and Car Parking and Communication Strategy included in Appendix 1 of the FMTS. This will be submitted at Deadline 6 (document reference 6.3.22.1A).
<p>3. Car Park at Fort Cumberland</p> <ul style="list-style-type: none"> a. Concerns about the car park being out of use for at least 66 weeks and for 50 of those weeks, 75% of 	<p>The Framework Management Plan for Recreational Impacts (REP 1-144) illustrates the phasing of the works at the Fort Cumberland Car Park and demonstrates how some parking could be retained during the construction period (see Appendix B).</p>

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<p>the car park will be out of use. This is unacceptable as the car park enables people to use beach.</p> <p>b. The car park is bounded by roads and an SSSI so people cannot go anywhere else to park.</p> <p>c. In summer it was “chaos” because so many people tried to use the car park at once.</p> <p>d. Hugely detrimental impact on local people.</p> <p>e. No mitigation proposed for temporary loss of the car park during construction and permanent loss of part of the car park in perpetuity due to structures being erected. Comment that monetary mitigation will not make a difference.</p>	<p>The occupancy surveys undertaken at Fort Cumberland Car Park demonstrate a maximum occupancy of 63 vehicles in the Car Park at any one time. The occupancy surveys in question were undertaken over a bank holiday weekend in August 2020 and thus are thought to reflect a robust assessment of peak demand for the Car Park despite the current Covid-19 pandemic.</p> <p>Further to this, overnight parking surveys have been undertaken by the Applicant investigating the reserve capacity available in alternative parking locations local to the Car Park, for example on the nearby residential roads of Ferry Road, Gibraltar Road and Lumsden Road. These surveys demonstrate reserve capacity on nearby residential streets for over 70 vehicles, suggesting there is sufficient reserve capacity to accommodate all displaced vehicles during works.</p> <p>The works will deliver the benefit of a newly surfaced car park to PCC at the Applicant's expense.</p>
<p>4. Location of drilling - lack of clarity as to whether the drilling will originate on dry land or under the sea and the lack of detail as to what the drilling rig will look like and the impact it will have on the local environment (including the extracted material).</p>	<p>The Applicant has carried out a worst case assessment, including in respect of visual impacts and impact on the local environment so that both scenarios are covered. The exact location of the drilling will be determined during detailed design.</p> <p>It has not yet been determined whether the drilling direction will be onshore to marine, marine to onshore, or drilling from both ends, as the geology in this location and further detailed design will dictate the final direction. Accordingly, the Applicant has employed worst-case scenarios, in respect of potential visual impacts and impacts on the local onshore and marine environments so that both scenarios have been robustly assessed. Chapter 3 (Description of the Proposed Development)(APP-118) and Appendix 3.4 (Additional Supporting Information for Marine Works) (APP-358) both provide details of the landfall at Eastney Beach and a further HDD Position Statement Note was submitted (REP1-132) to provide further clarity on the locations of all drilling compounds including the landfall (HDD-1) with images of drilling rigs. The ecological assessments undertaken within the Environmental Statement submitted do not predict any likely significant adverse effects to sensitive onshore or marine environments from the drilling works (or any extracted material) undertaken at Eastney, conclusions that Natural England and the Marine Management Organisation agree with. However, according to the LVIA assessment (APP-130) there would be significant effects on landscape and visual receptors during the construction period at landfall.</p>
<p>Councillor Judith Clementson (REP5-132)</p>	
<p>1. Three relevant changes affecting the UK since original application submission may considerably change our demand for use of imported electricity: Brexit, Covid 19 and the climate change emergency.</p>	<p>For the reasons set out in the response below, none of these changes affecting the UK will diminish the need for AQUIND Interconnector. In fact, the Covid 19 pandemic increases the urgency for investment in the UK economy and the climate change emergency requires a flexible system that can facilitate integration with renewables and enhance energy security. As explained below, there will still be a fundamental need for more interconnection between the UK and France irrespective of Brexit.</p>
<p>2. Discussed the Rochdale Envelope approach being used to cost the project and asked what funding guarantee is in place to cost the project? For example, for HS2 the</p>	<p>The Rochdale Envelope is used in the EIA to assess a worst case scenario. It is not used to inform costs.</p> <p>With respect to project costs and funding, please see the response to question 1f (REP5-090) above.</p>

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<p>initial costs estimate was £37.5 billion, but it is now an estimated £110 billion and rising. On what basis has AQUIND estimated £1.3 billion project costs and what contingency uplift has been included for costing aspects of the project yet to be detailed?</p>	<p>The Project cost has been carefully estimated following two rounds of third-party contractor quotations, estimates and benchmarking. The HS2 example is not relevant, as the Project is not seeking public funding to finance the construction of the Project and is not comparable in terms of scale and complexity. As explained in the Funding Statement (APP-023) the Proposed Development, and more broadly the Project, is to be funded through project finance funded and secured against the operational profits (revenues) of the Project.</p>
<p>3. Brexit:</p> <ul style="list-style-type: none"> a. When AQUIND began, the UK had not voted to leave the EU. Now, more likely that the UK will leave without a deal. b. Do not believe AQUIND has secured approval of the project from the EU. c. Britain may not benefit from the EU's internal energy market. d. Is it still wise for Britain to be dependent on overseas electricity? e. Questioned the reliability of the predicted £2.3billion projected savings to UK consumers and asked whether these calculations have been updated in light of changing circumstances? 	<p>The issue of Brexit is fully addressed in Section 3.6 of the Needs and Benefits Report (APP-115) and in the response to MG1.1.27 of the Applicant's Response to Written Questions. In particular, it should be noted that there will still be a fundamental need for more interconnection between the UK and France irrespective of Brexit.</p> <p>The importance of interconnectors in the post-Brexit GB energy mix has been recently emphasised in the Government's Energy White Paper¹, published on 14 December 2020, which commits to realise at least 18GW of interconnections by 2030. This is targeted at Great Britain being a potential net exporter of green energy and reducing curtailment of renewable generation.</p>
<p>4. Covid-19:</p> <ul style="list-style-type: none"> a. Online shopping has impacted high streets. b. People are working from home and less energy required to heat buildings. c. Digital technology reduces the demand for electricity. 	<p>The Applicant recognises that the Covid-19 pandemic is currently having an impact on the way people live, shop, work and travel. This in turn influences the type and amount of energy consumption.</p> <p>As reported in the IEA's Global Energy Review 2020 published in April 2020 (see section 2.6 of the Needs and Benefits Addendum - REP1-135) at the start of first lockdown in the UK, the short-term global demand in electricity had reduced, with reductions in commercial and industrial processes outweighing domestic demand.</p> <p>However even in a scenario where short-term demand continues to contract, the demand for renewables is likely to increase - with fossil fuel demand likely to be most impacted. As explained in the Needs and Benefits Report (APP-115) and Needs and Benefits Addendum (REP1-135) AQUIND Interconnector will help to facilitate a transition to renewable energy.</p> <p>As recognised by the Global Energy Review 2020, the pandemic also highlights the importance of electricity flexibility and security, for which the rise in renewables generation and their inherent intermittent nature, already poses challenges.</p> <p>It is also important to put the short-term effects of the pandemic in the context with longer term objectives and projections. The UK Government has this year has committed to achieving net zero carbon emissions by 2050. As recognised in the recently published Government Response to the National Infrastructure Assessment (November 2020) this commitment is "likely to result in a significant increase in electricity demand". The National Infrastructure Strategy</p>

¹ Energy white paper: Powering our net zero future - <https://www.gov.uk/government/publications/energy-white-paper-powering-our-net-zero-future>

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	<p>(NIS) published at the same time also states that to achieve net zero the power system will need to be much larger to cope with additional demand from electrification in transport, heating and industry and that “this expanded system will require increased investments in network infrastructure, sources of flexibility, such as interconnection, demand response and storage and enough low carbon generation capacity to provide the vast majority of the UK’s electricity needs” .</p> <p>In summary, whilst the pandemic affects energy consumption in the short term it highlights the increasing demand for renewables, and the consequent need for flexibility to address issues of intermittency and security of supply, the long term objectives for net zero will result in increased demand for electricity and for the majority to be provided by low cost renewables.</p> <p>The Needs and Benefits Report (APP-115) and Needs and Benefits Addendum (REP1-135) explains in detail the contribution that AQUIND Interconnector will make to enhancing security of electricity supply, integration of renewables, contribution to CO2 reductions and driving down costs for consumers.</p> <p>Setting aside the implications of Covid-19 with regard to demand, the pandemic presents an even greater need to support the UK economy and the AQUIND Interconnector, as an important large-scale infrastructure project, will contribute to this economic stimulus without any direct UK Government investment. There are also significant benefits associated with the fibre optics cables as explained in the Applicant’s FOC statement (REP1-127). The commercial use of the fibre optic cables will assist in the delivery of improved services such as broadband speeds. Fibre connections are becoming increasingly desirable due to their high speeds. Demand for increased bandwidth is increasing as businesses, governments, organisations, and the public continue to rely on more interconnectivity, particularly in the wake of COVID-19 where more distributed working arrangements have become the norm.</p>
<p>5. Climate Change Emergency:</p> <ul style="list-style-type: none"> a. The new Drax Combined Cycle Gas Turbine power station and the promise of additional offshore windfarms suggests Britain is using towards greener energy. b. Stated that electric vehicle technology will be short-lived. c. National Grid confirmed electricity demand has fallen by 16% since 2002 and even if there is a move to electric vehicles it would still fall to 10%. d. There is likely to be an oversupply of electricity. e. How would this affect AQUIND’s long term viability? f. Is this the time to grant application? 	<p>a-f The Applicant agrees that in order to achieve net zero carbon commitments the UK needs to decarbonise the power, heat and transport networks through ‘greener energy’.</p> <p>With regard to future demand for electricity, as recognised by National Grid in the 2020 Future Energy Scenarios (FES) “net zero will require significantly higher levels of electricity generation” (with some scenarios predicting a need for almost three times greater capacity than today). This is also reflected in the National Infrastructure Strategy (NIS) (November 2020) which explicitly states that the power system will need to be much larger to cope with additional demand for electrification and in the Government Response to the National Infrastructure Assessment (November 2020) which states that achieving net zero is “likely to result in a significant increase in electricity demand” .</p> <p>For the reasons explained in detail In the Needs and Benefits Report (APP-115) and Needs and Benefits Addendum (REP1-135) evidence in favour of increasing interconnection between the GB and European markets is compelling. Both the FES and NIS recognise the need for greater interconnection as a source of flexibility in the system alongside new low carbon generation to provide for the majority of the UK’s electricity needs. AQUIND Interconnector will not compete with new renewables generation but will facilitate greater integration between the UK and France to ensure that supply can be transferred from where it is abundant to where additional supplies are needed.</p>

Key concerns raised in oral and written representations	Applicant's response
<p>6. Conclusion:</p> <p>a. There is 4GW of interconnector capacity currently on-line and a further 8GW interconnector capacity either approved or under construction. It is prudent to wait until the impacts of Covid-19 become apparent and see if there will be an oversupply of electricity.</p> <p>b. The UK Energy White Paper is awaited and it is possible it will conflict with the Overarching National Policy Statement for Energy (EN-1).</p>	<p>In summary, the contribution that AQUIND Interconnector will make towards enhancing security of electricity supply, integration of renewables, contribution to CO2 reductions and driving down costs for consumers (as well as substantial investment in the UK economy) demonstrate that it is appropriate and beneficial to grant this application at this time.</p> <p>a & b. The direction pursuant to Section 35 of the Planning Act 2008 issued by the Secretary of State confirms that the Overarching National Policy Statement for Energy (EN-1) has effect in relation to the application. It is the primary policy document relevant to the determination of the application. This remains the case now that the Energy White Paper has been published.</p> <p>The Energy White Paper was published on 14 December 2020 and it specifically recognises that electricity demand could double by 2050 (page 41 and Figure 3.4) and that the electricity system of the future is to be “decentralised and interconnected.”. The Energy White Paper also states that “Interconnection increases the ability of the GB electricity market to trade with other markets, enhances the flexibility of our energy system and has been shown to have clear benefits for decarbonisation” (page 79).</p> <p>NPS EN-1 also provides various specific references to interconnection. Some are plainly still relevant and current. For example, para 3.3.31 notes that interconnection will play an important role in a low carbon electricity system and para 3.3.12 recognises that interconnection can help to compensate for the intermittency of renewable generation. Where figures are presented in EN-1 on the pipeline of interconnector projects (paras 3.3.32 and 3.3.33) the Applicant has presented more up to date sources and projections.</p> <p>As set out in the Needs and Benefits Addendum, the latest figures in the 2020 Future Energy Scenarios (FES) project interconnector capacity to grow in all scenarios up to 21.5GW by 2032. This compares to the current level of GB operational capacity of just 5GW.</p> <p>Prior to the publication of the Energy White Paper the government published a number of reports in November 2020 including the National Infrastructure Strategy (NIS) and Government Response to the National Infrastructure Assessment (November 2020). These both recognise that achieving net zero carbon commitments will increase electricity demands and specifically that this “will require increased investments in network infrastructure, sources of flexibility, such as interconnection, demand response and storage and enough low carbon generation capacity to provide the vast majority of the UK’s electricity needs”.</p> <p>In summary, there is no justification for delaying a decision on the AQUIND Interconnector. There is clear policy support for more interconnection and any delay to the decision would set back and reduce the contribution that the project will make to achieving net zero commitments and the substantial investment into the UK economy.</p>
<p>Mark Harris – University of Portsmouth (UoP) (REP5-151)</p>	
<p>1. Update on discussions with Applicant</p> <p>a. Met with the Applicant on 20 November and a meeting note was issued on 27 November. Due to</p>	<p>N/A – see below.</p>

Key concerns raised in oral and written representations	Applicant's response
<p>the timing, unable to agree a statement of common ground.</p> <p>b. Point of agreement – Furze Lane route amendment.</p> <p>c. Points of disagreement - impact on recreational activity on playing pitches and development potential of the campus site.</p>	
<p>2. Recreational Activity</p> <p>a. The University of Portsmouth objects to the impact on the recreational playing pitches identified on Plate 5 of the Framework Management Plan for Recreational Impacts.</p> <p>b. This is a particular issue for the women's football club, where the pitch would be used as a training site for the Euro 2022 Women's football championship.</p> <p>c. Plate 5 shows how the pitch can be reconfigured but does not cover the installation of the temporary haul road or for drainage and storage of soil during construction which reduce the pitch capacity to nil.</p> <p>d. From April 2022, the pitches will not be available for at least 16 weeks and potentially more.</p> <p>e. Mitigation not realistic or deliverable / no genuine mitigation available.</p> <p>f. Duration of pitch availability underestimated.</p>	<p>a. The Applicant continues to engage with the University in relation to the Framework Management Plan for Recreational Impacts.</p> <p>b. At the meeting on the 20th November, the University did not know whether the rugby pitches would be required for training during the Euro 2022, or whether the football pitches to the west of Furze Lane would be used. The Applicant will continue to work with the University to ensure impacts are minimised.</p> <p>c. Subject to confirmatory ground investigations (previously resisted by the University) there is scope within the Order limits to locate the cable to the eastern edge of the pitches which would allow for some reconfiguration of pitches to mitigate the short-term impact. This allows for the necessary access, drainage and soil storage arrangements.</p> <p>d and f. The programme for construction is timed during the summer months to minimise impacts during the main playing season, although it is accepted that use over the summer months will be impacted. Further information on pitch availability is contained in the Framework Management Plan for Recreational Impacts (REP4-026) which the Applicant continues to discuss with relevant parties.</p> <p>e. The Applicant view is that the mitigation put forward is realistic and deliverable. The OOCEMP requires that land is reinstated in consultation with the landowner (Section 1.2.2.13, REP4-005).</p>
<p>3. Development potential of the campus site</p> <p>a. The Applicant does not consider the potential for development in this area.</p> <p>b. Viability of land and land-swap arrangement.</p>	<p>a. The Applicant has responded to the current and emerging planning policy status of UoP Langstone's Campus in Table 4.2 (row 36-44) of the Applicant's Response to Written Representations (REP2-014). Whilst the previously developed parts of the Langstone Campus site may provide an opportunity to accommodate development, the existing green space at the site is most likely to be protected from further built development.</p> <p>b. N/A (The viability of the land swap was directed at UoP)</p>
<p>4. Open space constraints</p>	<p>Section 132 requirements addressed in Statement of Reasons (para.8.1 APP-022) There will be no physical infrastructure on the surface of any Special Category Land and the acquisition of the rights sought will not affect the character of the land following construction since the land must be restored to its prior condition following the installation of the cables (Requirement 22)</p>

Key concerns raised in oral and written representations	Applicant's response
	<p>The Applicant has, in the scheme design, sought to avoid greenspaces and recreational facilities wherever possible and it has made use of HDD where it can to avoid such impacts e.g. Milton Locks Nature Reserve, Milton Allotments, Eastney Beach. Where possible, it has also sought to avoid playing surfaces where open space needs to be crossed.</p> <p>The Applicant recognises that there will be some impacts and these are assessed in the ES (Chapter 25, APP-140) with appropriate mitigation proposed. This includes the Framework Management Plan for Recreational Impacts (REP-1-44). The Applicant continues to discuss the mitigation proposals to further reduce the identified significant residual impacts.</p>
<p>5. Impacts on business and university activity severe</p>	<p>The Applicant has set out its preference is to install the Onshore Cable Route in the eastern extent of the Order limits which coincides with the eastern extent of the University's playing fields at the Langstone Campus. The approximate length of the Onshore Cable Route in the land owned by the University, plot 9-26 as shown on the Land Plans (REP5-003), is 325m. As the method of installation in this area will be open trenching, the Onshore Cable Route will consist of 2 no. trenches (one for each circuit). This equates to 650m of open trenching required for installation works. Based on an assumed, albeit conservative, installation rate of 50m per day in such land, installation works would take approximately 3 weeks with reinstatement taking place thereafter. The Applicant is preparing further information on reinstatement timescales, though note that Paragraph 14 of the University's Open Floor Hearing Statement states 'The University's specialist pitch consultant (Sports Field Design Ltd) identifies the time variables involved. For re-turfing in ideal conditions, it could be 6 weeks but is more likely to be 3-4 months'.</p> <p>The Applicant has set out in the Framework Management Plan for Recreational Impacts – (REP4-026) that mitigation is available by moving the southern rugby pitch further west on a temporary basis, which would result in that pitch continuing to be available for recreational use whilst works are taking place. The 5-a-side pitch at the northern part of the Order Limits would be unaffected in the event it is feasible to install the Onshore Cable Route to the east of it. It will be necessary to install the Onshore Cable Route across the eastern part of middle rugby pitch though it should be noted there is space available to move the central pitch further west which would result in the cable installation works shortening the length of the pitch by approximately 10m whilst the works are taking place. Fundamentally, the majority of the pitch would remain available for use.</p> <p>The Applicant notes there are an additional 4 full size grass pitches and a 5-a-side grass pitch located at the west side of the campus as well as an astro-turf pitch and a 3G pitch. Furthermore, as a result of the programme restrictions in place for the protection of the Solent Waders and Brent Geese, no works will take place between October to March inclusive, resulting in the works having to take place between April and September. Whilst the Applicant recognises the University has a year-round demand for the provision of sports facilities, it understands the demand during the summer months is reduced compared to during the academic calendar.</p> <p>As such, the Applicant proposes that mitigation is available to minimise the impact on the University's sports pitches at the eastern side of the campus which in turn minimises impacts on University activities and business. The Applicant looks forward to further engagement with the University to secure a voluntary agreement for the rights required by the Applicant.</p>

Key concerns raised in oral and written representations	Applicant's response
<p>6. Use of HDD over trenching requires further investigation</p>	<p>At the meeting on the 20th, the requirements for cable installation were explained. It was also explained that HDD is generally used where open trenching cannot be used and also results in construction compounds which take up greater space for more extended periods of time.</p>
<p>Kimberley Barret – Individual submission (REP5-141)</p>	
<p>1. Air Pollution and climate emergency declared in PCC.</p> <p>a. There is no guarantee that the project will result in zero emissions.</p> <p>b. The area is facing government imposed air quality restrictions.</p>	<p>a. ES Chapter 28, Carbon and Climate Change, (APP-143) of the ES identifies minor adverse emissions during construction. However, once operational, the proposed development will result in a moderate, significant, beneficial effect on emissions.</p> <p>b. Air Quality has been assessed in ES Chapter 23 (REP1-033). The assessment does not identify any significant effects as a result of the construction, related traffic emissions or non-construction traffic related emissions. The impacts associated with diversions, road closures and construction traffic impacts are transitory and temporary in nature and not predicted to impact on the ability to meet obligations under the EU Air Quality Directive 2008/50/EC.</p>
<p>2. Traffic concerns – if there is an accident, the city becomes deadlocked. People will not come into city if there is traffic. This project will take 66 weeks as a minimum and could cause further traffic backlogs.</p>	
<p>3. Scoping concerns – scoping suggested PCC should only comment on landfall, not the route of the cable.</p>	<p>Chapter 2 of the Scoping Report issued in November 2019 (APP-365) covered the elements of the onshore and offshore cable, it was not limited to the landfall.</p>
<p>4. Environmental Impacts</p> <p>a. There may be significant environmental effects.</p> <p>b. Were told that due to Harbour being SSSI that the landfall cannot be placed there. Why can't they make landfall elsewhere?</p> <p>c. Why can't routes by others be repurposed? E.g. Southern Water Tunnels</p>	<p>a. Chapter 30 of the ES (Summary and Conclusions, APP-145), clearly sets out the residual environmental effects for each topic. The SoS will take into account environmental, social and economic benefits and adverse impacts, at national, regional and local levels when making a decision as set out in paragraph 4.1.3 of the Overarching National Policy Statement for Energy (EN-1).</p> <p>b. Langstone Harbour – Direct Impacts have been avoided through HDD use (so it will not run through the harbour) and there will be no perceptible effects above what is already associated with use of harbour.</p> <p>c. Due to the requirement to construct an asset that is suitable to support the installation of two HVDC cable systems with a design life of at least 40 years, the use of existing infrastructure is not feasible due to parameters such as dimension, location, conditions, routing, safe access for installation, depths and the ability to be able to guarantee that the system performance could be met.</p> <p style="padding-left: 40px;">In addition, a contractor is unlikely to utilise disused infrastructure as they will not be able to provide full warranties in respect of work undertaken to the undertaker. Therefore, it is not commercially viable.</p>
<p>5. Loss of green spaces</p> <p>a. No mitigation for loss of open green spaces.</p> <p>b. Here are high levels of obesity and people need green spaces.</p>	<p>a. The Applicant has sought to avoid green spaces and recreational spaces and has made use of HDD where it can. For example, Milton Lock Nature reserve, Eastney beach and the Milton allotments. The Applicant has also sought to avoid playing spaces. It recognises there will be some impacts but these have been assessed, with appropriate mitigation</p>

Key concerns raised in oral and written representations	Applicant's response
	<p>proposed, including through the Framework Management Plan for Recreational Impacts (REP4-026) which continues to be discussed.</p> <p>b. The link between greenspace and obesity has been identified in Chapter 26 of the ES (26.5.3.1, 26.5.3.5). The impacts on partial and temporary loss of greenspace were not found to be significant for health.</p>
<p>6. Milton Common – yet to see conclusive remarks regarding methane gas.</p>	<p>ES Chapter 18 (APP-133) identifies a record of possible methane at Milton Common from a record of an in-ground waste fire occurred in the early 1980s, which is understood to have been caused by ignition of methane in the ground.</p> <p>Section 6.10.2 of the onshore outline CEMP (REP4-005) sets out measures to be taken if contamination is present during construction and these include gas protection measures.</p>
<p>7. Impact of drilling on residents' properties. Many houses are well over 100 years old and concerns that issues may arise in terms of vibration damage from drilling due to the age of the properties</p>	<p>None of the HDDs will pass below residential properties and no significant effects from vibration during construction have been identified. Table 5.15 of the Applicant's Response to Relevant Representations (REP1-160) confirms that the levels of vibration predicted are not of sufficient magnitude to cause building damage, regardless of property age. Furthermore, the criteria used in our assessment which are based on human perception to vibration, are substantially stricter than those that would be appropriate for building damage.</p>
<p>8. Allotments – concern that they won't follow the paths and cut across the allotment paths.</p>	<p>The Applicant's proposal has always been that the onshore cable corridor would be installed via HDD to avoid impacts on allotments. The Applicant is only seeking over the existing paths only for the undertaking of visual inspections during construction to allow for checks to be made for any bentonite (a CEFAS approved non-toxic clay lubricant) breakout associated with the HDD works, and rights to temporarily access the Allotment plots for the purpose of clearing any such bentonite breakout (in the unlikely event that occurs).</p>
<p>Kimberley Barret – Keep Milton Green Action Group (REP5-141)</p>	
<p>1. Concerns about allotments, noting that people have established their plots for many years.</p>	<p>The Applicant's proposal has always been that the onshore cable corridor would be installed via HDD to avoid impacts on allotments. It has been confirmed through updates to the Land Plans (REP1-011a) and the Book of Reference (REP4-003) that the only rights sought over the Allotments are a right of access on foot over the existing paths only for the undertaking of visual inspections during construction to allow for checks to be made for any bentonite (a CEFAS approved non-toxic clay lubricant) breakout associated with the HDD works, and rights to temporarily access the Allotment plots for the purpose of clearing any such bentonite breakout (in the unlikely event that occurs).</p> <p>The Applicant has sent a FAQ sheet to all allotment holders which will be aimed at addressing some of the previously voiced concerns surrounding the allotments. The FAQ confirms that the Applicant is not planning to impact any allotment plots during the construction or operation of AQUIND Interconnector</p>
<p>2. Great Crested Newt population at the allotments which are a protected species.</p>	
<p>3. Length of disruption with no break or compensation.</p>	<p>There will be no disruption to allotments as stated above. In any event, the Applicant cannot lawfully exclude the payment of compensation, and it has not sought to do so.</p>

Key concerns raised in oral and written representations	Applicant's response
	<p>Category 3 persons have been clearly identified in the Book of Reference as those persons that either have a relevant claim under Part 1 of the Land Compensation Act 1973, Section 10 of the Compulsory Purchase Act 1965 and/or section 152(3) of the Planning Act 2008.</p> <p>The Planning Act 2008 also provides for any persons whose rights are so interfered with by a promoter implementing a DCO in exercise of statutory powers to claim compensation, in lieu of the right they would otherwise have under the law to take an action for nuisance.</p>
<p>4. Health risks of electromagnetic fields.</p>	<p>The potential effects of EMF have been assessed are contained in Appendix 3.7 (Onshore Electric and Magnetic Field Report) of the ES (APP-361). Public Health England have confirmed they are satisfied with the assessment. There will be no electromagnetic field along the route and electromagnetic field strength will be below relevant guidelines. The laying of circuits at different times is not for electromagnetic field issues, but reasons of traffic management only.</p>
<p>5. Loss of green space lost and no compensation.</p>	<p>The Applicant has sought to avoid green spaces and recreational spaces and has made use of HDD where it can. For example, Milton Lock Nature reserve, Eastney beach and Milton allotments. The Applicant has also sought to avoid playing spaces, as well as considering working areas and programming of works where possible. It recognises there will be some partial loss of greenspaces and this will be temporary to the construction period. Proposed mitigation measures are contained in the Framework Management Plan for Recreational Impacts (REP-1-44) which the applicant continues to discuss with the relevant planning authorities.</p>
<p>6. Request to add fibre optic towers</p>	<p>The Applicant can confirm that there will be no towers erected in relation to the fibre optic cables and clarifies that the fibre optic cables will be completely underground and installed together with HVDC cables.</p>
<p>7. Constant changes with the proposed route and comment that in the week before the hearing 70 documents alone were submitted.</p>	<p>The cable corridor for AQUIND Interconnector was first presented to the local community via a public consultation in early 2018. The feedback received from local residents, businesses and other stakeholders was used to refine the cable corridor as presented during a further round of consultation in early 2019, after which the cable corridor was further refined having regard to feedback received before the submission of the application (November 2019). With regard to the refinements made to the cable corridor after each round of consultation, and in relation to the latest reduction, AQUIND gave particular consideration to feedback received relating to the temporary impact on highways and traffic flows.</p> <p>Following feedback received during the statutory consultation between 27 February – 29 April 2019, and before submitting an application for a DCO to build and operate AQUIND Interconnector, many of the more sensitive locations of the cable corridor were either significantly reduced or removed altogether. In Portsmouth, for example, areas of Bransbury Road, Milton Road, Velder Avenue and Eastern Road were removed from the cable corridor following feedback from the local community, local authorities and other stakeholders.</p> <p>Since the submission of the Application in November 2019 changes have been proposed to reduce the Order limits, including areas of highway in the administrative boundary of Portsmouth City Council, in response to further feedback received. The Order limits as proposed in the recent submission to the ExA can be seen on the Site Location Plan (REP1-007).</p>

Key concerns raised in oral and written representations	Applicant's response
<p>8. Insufficient consultation. 100s/1000s people now showing their concerns but far less responded at consultation stage.</p>	<p>The Applicant has produced a comprehensive consultation report (APP-025) which details the pre-application engagement with stakeholders, including two rounds of consultation undertaken between January - February 2018 and February – April 2019.</p> <p>Both consultations were widely publicised through a variety of means, including invitation newsletter issued to the local community, alongside</p> <p>The January-February 2018 consultation invited views on the emerging plans for the Proposed Development. Three public exhibition events were held in the vicinity of the Proposed Development, which were publicised via numerous means, including invitation newsletters issued to the local community, together with both press coverage and adverts in local papers, and Facebook adverts viewable by those in the vicinity of the Proposed Development. Feedback received as part of this consultation was used to refine plans for the Proposed Development.</p> <p>The subsequent February-April 2019 consultation invited feedback on these revised plans and was widely publicised to the public via newsletters sent to 16,592 households and businesses in the vicinity of the Proposed Development (an area known as the 'Primary Consultation Zone' or 'PCZ'). The pre-application consultation was also advertised in relevant newspapers – including the Portsmouth News, Hampshire Chronicle and Horndean Post – and via Facebook to individuals living within proximity of the Proposed Development. Nine public exhibitions were held in the vicinity of the Proposed Development, whilst USB memory sticks, containing copies of the consultation materials, were provided at 10 deposit locations across the area affected. All consultation materials were also available via the project website at www.aquindconsultation.co.uk throughout the consultation.</p> <p>During both stages of pre-application consultation, the Applicant took great care to ensure that its proposals were clearly explained, and that the consultation enabled hard to reach groups to engage with it. All feedback received as part of both consultation periods was considered by the Applicant. A summary of all feedback received and the Applicant's responses to the issues raised is available in the consultation report (APP-025).</p> <p>The consultation accords with s.42, 47 and 48 of the PA 2008 as recognised by the acceptance of the application by PINS on 12 December 2019.</p> <p>Following the submission of the application, AQUIND has continued its engagement with key stakeholders and maintained an open line of communication with the local community, through the provision of a project website, freephone information line, email address and freepost address, the details of which you will find at the top of this letter. At key milestones, AQUIND has also taken steps to update interested parties and key stakeholders on its proposals, including via a Community Update Newsletter issued on 10 January 2020, as well as subsequent updates via the project website.</p>
<p>9. Why did the Applicant not consider a less populated area.</p>	<p>Each element of the scheme is the product of an extensive optioneering process. As required by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 the ES sets out the alternatives considered by the</p>

Key concerns raised in oral and written representations	Applicant's response
	Applicant and the reasons why the Proposed Development was chosen (ES Chapter 2 Consideration of Alternatives (APP-177) and the Supplementary Alternatives Chapter (Appendix 3 of the ES Addendum (REP1-152))).
10. Plea to the ExA to take into account the “expert views” of the residents	N/A
David Langley (REP5-135)	
1. Poorly informed - attended consultation 2 years ago which said there would be long term benefits and short-term negatives.	Please refer to the response to REP5-141 above (point 8) which provides an overview of the comprehensive consultation carried out by the Applicant.
2. AQUIND cannot be trusted.	
3. Important elements missing from the thousands of documents submitted.	The Applicant has carried out a thorough assessment and does not agree that important elements are missing from the Application that has been submitted.
4. The Applicant raises questions in relation to: <ul style="list-style-type: none"> a. how the impact of Covid-19 had been considered. b. the consequences of no-deal or bad deal for Brexit. c. how many interconnectors are already approved or advanced in planning? d. who or what will benefit from interconnector? 	<p>a – d) Whilst the pandemic affects energy consumption in the short term it highlights the increasing demand for renewables (and the consequent need for flexibility and energy security) the long-term objectives for net zero will result in increased demand for electricity and for the majority to be provided by low cost renewables.</p> <p>The Needs and Benefits Report (APP-115) and Needs and Benefits Addendum (REP1-135) explains in detail the benefits of the AQUIND Interconnector and the contribution it will make to enhancing security of electricity supply, integration of renewables, contribution to CO2 reductions and driving down costs for consumers. The report also provides details on the local and regional benefits through employment generation, household savings, flexible and clean electricity supply and taxation through business rates.</p> <p>The pandemic also presents an even greater need to support the UK economy and the AQUIND Interconnector, as an important large-scale infrastructure project, will contribute to this economic stimulus without any direct UK Government investment.</p> <p>The Needs and Benefits Report (APP-115) and Needs and Benefits Addendum (REP1-135) sets out the details of existing and proposed interconnectors. In summary, the total capacity of GB interconnectors is 5GW compared to an optimal interconnection range of between 18.1GW and 23.1GW.</p> <p>France represents one of the most favourable countries in Europe for interconnection, due to low electricity prices and availability of clean energy. Currently only one interconnector – the 2GW IFA constructed in 1986 - connects GB and France. The January 2020 Network Options Assessment specifically recognises the opportunities of greater interconnection with France. This supports analysis by AQUIND which concludes that the optimal capacity on the GB-French border is in excess of 8GW (refer to Appendix 2 of the Needs and Benefits Addendum). The two interconnectors currently under construction – Eleclink and IFA 2 will provide 1GW each. Two further planned developments FAB Link and GridLink would each provide 1.4GW, although the investment in FAB Link, which is partly owned by French national transmission operator RTE, was suspended by the French energy regulator at the end of 2017.</p>

Key concerns raised in oral and written representations	Applicant's response
	The issue of Brexit is fully addressed in Section 3.6 of the Needs and Benefits Report (APP-115) and in the response to MG1.1.27 of the Applicant's Response to Written Questions. In particular, it should be noted that there will still be a fundamental need for more interconnection between the UK and France irrespective of Brexit.
5. AQUIND is a private limited Company with funders from overseas unregulated territories.	Please refer to the Applicant's funding statement which explains the Applicant's corporate structure (APP-023).
6. Two years ago there was no mention of a telecommunications system. Now it has been mentioned and large-scale buildings proposed.	<p>The fibre optic cables were referred to in the 2018 consultation material and the section 35 request specifically stated "It is also the intention of AQUIND when seeking development consent for AQUIND Interconnector to seek development consent to use the spare fibre optic cable capacity for the provision of commercial telecommunications services" (AS-040).</p> <p>The need for up to two Optical Regeneration Stations (ORS) associated with the Fibre Optic Cable was explained in the Preliminary Environmental Information Report (Feb 2019) (specifically in the Non-Technical Summary, Section 3 Description of the Proposed Development and relevant topic assessments). The location was not known but was anticipated to be within approximately 1 km of the Landfall and would comprise up to two buildings ancillary equipment and security fence which are not large scale.</p> <p>Therefore, it has always been the Applicant's intention that the fibre optic cables and associated infrastructure would form part of the Application, and it has been very clear in this respect.</p>
7. Noted that Fort Cumberland Car Park is hugely important in the summer.	Surveys have been undertaken at Fort Cumberland Car Park in August 2020 and surrounding roads to show that there is capacity for alternative parking (FTMS, REP1-068).
Viola Langley ("Let's Stop AQUIND" Facebook Group) (REP5-152)	
1. Covid-19 presents challenging times.	Please refer to the response to comments raised by Councillor Judith Clementson at REP5-132, item 4.
2. There are few green spaces in Portsmouth and a climate change emergency so it is necessary to look at the interconnector cable afresh.	
3. Questioned why the project is being imposed on the most densely populated city with highest population level.	The proposed development is the product of an extensive optioneering process. The ES sets out the alternatives considered by the Applicant and the reasons why the Proposed Development was chosen (ES Chapter 2 Consideration of Alternatives and Supplementary Alternatives Chapter Appendix 3 of ES Addendum, REP1-152).
4. Criticised AQUIND's engagement with the public. People feel intimidated and disregarded.	Please refer to the response to REP5-141 above (point 8) which provides an overview of the comprehensive consultation carried out by the Applicant.
5. Asked the following questions: a. Why is this a nationally significant infrastructure project?	a. The Secretary of State (SoS) for Business, Energy and Industrial Strategy issued a direction on 30 July 2018 directing that the Proposed Development, together with any development associated with it, is to be treated as development for which development consent is required, being satisfied that the relevant legal requirements were met and of the view that the Proposed Development is by itself nationally significant. In particular, the SoS considered that the two giga-

Key concerns raised in oral and written representations	Applicant's response
<ul style="list-style-type: none"> b. Why is the local authority being made powerless? c. Why should people be expected to move from green spaces, even for a day? d. Why should we tolerate impacts on the environment? e. Why are residents asked to accept disruption? 	<p>watt capacity of the Proposed Development is similar in terms of electrical capacity to a generating station that would qualify to be considered under the Planning Act 2008 process as nationally significant.</p> <p>b. The Local Authorities are each statutory consultees, have been consulted throughout the process and are taking part in the Examination.</p> <p>c- e. The SoS in considering any proposed development, and in particular when weighing its adverse impacts against its benefits, is required to take into account paragraph 4.1.3 of the Overarching National Policy Statement for Energy (EN-1). This states that the SoS should take into account its potential benefits including its contribution to meeting the need for energy infrastructure, job creation and any long-term wider benefits and its potential adverse impacts, including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce or compensate for any adverse impacts.</p>
<p>6. The electromagnetic field is a real concern for people living next to the cable.</p>	<p>The potential effects of EMF have been assessed are contained in Appendix 3.7 (Onshore Electric and Magnetic Field Report) of the ES (APP-361). Public Health England have confirmed they are satisfied with the assessment. There will be no electromagnetic field along the route and electromagnetic field strength will be below relevant guidelines.</p>
<p>7. Concerns around methane in Milton Common.</p>	<p>ES Chapter 18 (APP-133) identifies a record of possible methane at Milton Common from a record of an in-ground waste fire occurred in the early 1980s, which is understood to have been caused by ignition of methane in the ground. This has been taken into account and section 6.10.2 of the OOCEMP (REP4-005) sets out measures to be taken if contamination is present during construction and these include gas protection measures.</p>
<p>James Veryard</p>	
<p>1. Volume of documentation.</p>	<p>Due to the nature of the Examination process and a project of this size, the large volume of documentation is unavoidable.</p>
<p>2. Concerns in relation to human health as the “cables will be 5% of UK’s electricity consultation and will be within 8m of house.”</p>	
<p>3. Electromagnetic fields</p> <ul style="list-style-type: none"> a. Impact on spinal cord simulator and deep vein. b. Risk of cancer – no studies on links of electromagnetic field to cancer. 	<p>a & b) The potential effects of EMF have been assessed are contained in Appendix 3.7 (Onshore Electric and Magnetic Field Report) of the ES (APP-361). Public Health England have confirmed they are satisfied with the assessment. There will be no electromagnetic field along the route and electromagnetic field strength will be below relevant guidelines.</p>
<p>4. Reduction on house prices – would not have bought house had he known about the impact.</p>	<p>The proposal is similar to other underground services and would have significant public benefits.</p> <p>The cable complies with all relevant guidance, Public Health England have confirmed they are content that it does not give rise to health issues, and therefore there is no sound basis on which property values would be affected by the presence of the onshore cables in the highway.</p>

Key concerns raised in oral and written representations	Applicant's response
<p>5. Noise from construction and operation from cable – impact on sleep.</p>	<p>As the cables are to be laid underground, the operational noise effects from the HVAC and HVDC cable will be negligible, and hence this aspect was scoped out of the ES. This was agreed by the ExA as confirmed in Table 4.21.1 of the EIA Scoping Opinion (APP-366). Impacts on noise from construction, including night-time noise, are assessed within Chapter 24, Noise and Vibration (APP-139).</p>
<p>6. Width of Farlington Avenue and tree ownership at edge of boundary.</p>	<p>The Applicant will only remove trees of high/medium value where their loss is unavoidable i.e. where the tree is impacted to such an extent that its physiological viability and/or structural integrity is significantly diminished such that long-term retention does not accord with arboricultural best practice. Retention or loss will be decided by a suitably trained and qualified arboriculturalist and confirmed in consultation with PCC through the requirements of the Arboricultural Method Statement.</p>
<p>7. Effect on redevelopment of old bungalows in the future.</p>	<p>The Applicant can confirm that the cable route will not pass below any residential properties.</p>
<p>Parish Council of Denmead – Councillor Leonard Smith (REP5-079)</p>	
<p>1. Volume of documentation. Time consuming trying to keep up with the Project and continually changing documentation.</p>	<p>Due to the nature of the Examination process and a project of this size, the large volume of documentation is unavoidable.</p>
<p>2. Not just short-term disruption. The residents of Denmead Parish will be faced with a 26m tall building for 40 years or more.</p>	
<p>3. dDCO lacks consideration of communities.</p>	<p>The impacts on communities, including community facilities, have been carefully taken into account and the findings are assessed in Chapter 25 (Socio-economics, APP-140) of the Environmental Statement.</p>
<p>4. No Employment and Skills Plan and therefore no opportunity for local residents to gain employment.</p>	<p>Given that predicted construction employment is not assessed as significant, the Applicant does not believe an ESP is required in this instance. There are measures set out at Paragraph 25.9.2.1 of the ES (APP-140) and section 5.12.1.1 of the OOCEMP (REP1-087) to encourage the Contractor to provide local opportunities. However, this is something that is still being discussed with the local planning authorities.</p>
<p>5. The dDCO asks for exemption on noise legislation – queried if this is for the whole 40 years of the project.</p>	<p>Article 9 of the dDCO provides that no one is able to bring statutory nuisance proceedings under the Environmental Protection Act 1990 in respect of noise, if the noise is created in the course of carrying out construction, operation or maintenance of the Authorised Development. This applies for the lifetime of the Project.</p> <p>As explained in the Applicant's hearing transcript for Issue Specific Hearing 3 (REP5-069) and the post hearing summaries, this is required for development where proceedings for statutory noise related nuisance could be brought and potentially prevent activities being carried on where the Authorised Development is being constructed and/or operated in accordance with the approved noise limits. The provision seeks to ensure that the undertaker will not be</p>

Key concerns raised in oral and written representations	Applicant's response
	<p>required to achieve noise levels in the future which are lower than those which have been assessed and determined as acceptable if the surrounding environment changes outside of the Applicant's control.</p>
<p>6. Concerns about “the Denmead hum” which some residents can hear from the Lovedean Substation.</p>	<p>During the Applicant's baseline noise survey completed at positions indicative of surrounding sensitive receptors, noise from the existing Lovedean Substation was described (depending on the measurement position and distance from the substation) as ranging between a 'low level audible hum of electric generated noise' to 'barely audible' or 'barely perceptible'. As far as the Applicant is aware based on consultations, no complaints have been received by WCC or EHDC in relation to the operational noise from the substation.</p> <p>The Applicant has ensured low frequency noise and characteristic features (e.g. tones/hums) from the Proposed Development are robustly addressed as follows:</p> <ul style="list-style-type: none"> • The noise assessment contained in Chapter 24 of the ES and Chapter 17 of the ES Addendum has concluded that that there will be negligible effects at all receptors during the operation of the Converter Station. • The noise criteria set out in the 'Operational Broadband and Octave Band Noise Criteria Document' (REP1-129) are secured through Requirement 20 of the Draft DCO, and these noise criteria will ensure that the operational effects are no greater than those identified in the ES. • The broadband operational noise criteria are expressed in terms of a Rating Level, which following the principles of British Standard 4142, will ensure that any characteristic features of the operational noise (e.g. tones/hums) will be robustly quantified and mitigated as necessary. • The broadband noise assessment has also been supplemented by an octave band assessment, which has ensured operational Converter Station noise across different frequencies (e.g. low frequency noise) has been robustly assessed. Octave Band Noise Criteria are also secured through Requirement 20 of the Draft DCO.
<p>7. No compensation for the project.</p>	<p>The Applicant cannot lawfully exclude the payment of compensation, and it has not sought to do so.</p> <p>Category 3 persons have been identified in the Book of Reference as those persons that either have a relevant claim under Part 1 of the Land Compensation Act 1973, Section 10 of the Compulsory Purchase Act 1965 and/or section 152(3) of the Planning Act 2008.</p> <p>The Planning Act 2008 also provides for any persons whose rights are so interfered with by a promoter implementing a DCO in exercise of statutory powers to claim compensation, in lieu of the right they would otherwise have under the law to take an action for nuisance.</p>
<p>Parish Council of Denmead – Councillor Andreoli (REP5-079)</p>	
<p>1. Will be faced with 26m building with a bright colour scheme. The converter station should be camouflaged.</p>	<p>The reasons for the potential maximum height of the Converter Station is explained above.</p> <p>The Applicant has sought to ensure that the Converter Station blends into its environment as much as practicable, while still retaining some visual interest, through a number of design measures associated with the Converter Station. These are referred to as design principles in the update submitted at Deadline 6 (document reference 5.5) and include a range of colours designed to visually break up the overall mass, curved corners, a rationalising of different functions of buildings</p>

Key concerns raised in oral and written representations	Applicant's response
	<p>to avoid visual clutter and avoiding plant on the roofs of the highest buildings (refer to the Applicant's Comments on Local Impact Reports in response to WCC comments Table 7.6 (4.6.12) (REP2-013)).</p> <p>The Applicant has reached agreement with the LPAs on the majority of the Converter Station Design Principles and colour is part of ongoing discussions with the aim of achieving a set of subdued and recessive colours.</p> <p>It should be noted that in terms of the photomontages referred to in Figure 15.35 (APP-278), Figure 15.36 (APP-269) and Figure 15.37 (APP-270) whilst they appear "bright", they would in reality be duller and more recessive, the fins/ baguettes contributing to this by creating a darker shadowing effect. There are limitations with how the graphics for the building were presented on the photomontages.</p> <p>In terms of landscape mitigation, the Applicant has sought to site the Converter Station in the most appropriate location to serve a visual screening function. Existing vegetation will be retained where feasible and new planting proposed as presented in the revised indicative landscape mitigation plans Figure 15.48 and 15.49 (document reference 6.2.15.48 and 6.2.15.49 respectively) and landscape mitigation plans for Option B(ii) (document reference 7.7.8) which have been submitted for Deadline 6 alongside this response. Proposals include selecting a sloped location, which allows a cut and fill into the slope to provide a level platform for the siting of the Converter Station whilst reducing the visible height of the Converter Station from some angles.</p>
<p>2. Request to ignore Tree Protection Orders.</p>	
<p>3. Loss of flora and fauna around converter station:</p> <p>a. It will result in loss of trees and hedgerows and no clear definition of how to ensure it will be maintained.</p> <p>b. dDCO should have clear long-term plan for maintenance of landscaping and hedgerows.</p>	<p>a and b. The Applicant appreciates that vegetation will be lost within the Converter Station Area because of the Proposed Development, that the extent of loss will vary depending on the Option presented (Option B(i) versus Option B(ii)) and this is reflected as a significant effect in the Landscape and Visual Impact Assessment (APP-130). The Applicant however has sought to protect existing vegetation and introduced new planting as referred to in the revised indicative landscape mitigation plans Figure 15.48 and 15.49 (document reference 6.2.15.48 and 6.2.15.49 respectively) and landscape mitigation plans for Option B(ii) (document reference 7.7.8) which have been submitted for Deadline 6 alongside this response.</p> <p>In terms of maintenance, existing and proposed vegetation will be maintained throughout the operational lifetime of the Proposed Development in relation to the Converter Station. This is referred to in the Outline Landscape and Biodiversity Strategy (document reference 6.10, submitted at Deadline 6) and secured through Requirement 8(3) of the draft Development Consent Order (REP5-008).</p> <ul style="list-style-type: none"> Paragraph 1.1.3.9 of the OLBS states: "The management, maintenance and monitoring plans included in any detailed landscaping scheme for the Converter Station Area and the Landfall must prescribe the maintenance regimes for all different landscape/habitats considering the aims, specific objectives and functions of each area of planting/habitat, to ensure the full and successful establishment of the planting when reviewed against specific targets/indicators." <p>Regarding point b) and the long-term maintenance of landscaping and hedgerows, the Applicant refers to paragraph 1.7.1.3 of the Outline Landscape and Biodiversity Strategy (OLBS) (document reference 6.10) submitted at Deadline 6 and Requirement 8 of the draft Development Consent Order (REP3-003).</p>

Key concerns raised in oral and written representations	Applicant's response
	<ul style="list-style-type: none"> • OLBS paragraph 1.7.1.3: "The proposed management prescriptions for existing, new and replacement planting associated with Section 1 Converter Station Area will take place throughout the operational lifetime of the Proposed Development. The undertaker will be responsible for the maintenance of landscaping to be provided in connection with the ORS buildings at the Landfall, as confirmed at Requirement 8 to the dDCO." • dDCO 8(3): "All landscaping provided in connection with Works No.2 and the optical regeneration stations within Works No.5 must be retained, managed and maintained during the operational period."
<p>4. dDCO makes no binding commitment for decommissioning and how the land will return to agricultural use.</p>	<p>The Applicant has inserted Article 24 into the dDCO (REP3-003) to cover decommissioning.</p> <p>However, it is relevant to point out that the Applicant is not seeking consent to decommission the authorised development at this time. This is because whilst the authorised development is to be designed with a design life of 40 years, it is not the case that it will only be in operation for 40 years and then be required to be decommissioned. Furthermore, it is not considered to be a sound approach for decommissioning, which will be an act of development, to be consented at this time, as it is not possible to undertake a robust environmental assessment of the decommissioning activities where the baseline environment some 40 years or more in the future will be different to the baseline environment today, and the changes cannot be predicted with accuracy.</p>

Table 1.2 - Applicant's Response to Submissions made at OFH2

Key concerns raised in oral and written representations	Applicant's response
<p>Penny Mordaunt MP</p>	
<p>1. The following two issues are no longer live issues but have left residual concerns about mistrust amongst constituents:</p> <ul style="list-style-type: none"> a. Concerns about the nature of the land interest questionnaire which gave the impression that a large number of people would have home compulsory purchased b. Concerns in relation to allotments 	<p>a and b) The Applicant apologises for any concerns and mistrust amongst your constituents. Under the Planning Act 2008, the Land Interest Questionnaires were a necessary part of the process to identify those persons that may have an interest in land affected by the Proposed Development in alignment with the design stages and prior to the Statutory Consultation in order to ensure that all parties were consulted. The Applicant has liaised with the Allotment Holders Association throughout the process and has recently provided updated information to the Allotment holders, including a FAQ document, which is aimed at addressing some of the previously voiced concerns surrounding the allotments. The FAQ confirms that there is no intention to impact on any allotment plots during the construction or operation of AQUIND Interconnector</p>
<p>2. The following issues remain "live"</p> <ul style="list-style-type: none"> a. Environmental and ecological concerns in relation to the harbour and water quality 	<p>a) Extensive consideration has been given to the effects of the proposed development on ecological receptors including all designated sites, including water quality [ES Chapter16 Onshore Ecology, APP-131, Marine Chapters 6-14 App-121-129, Habitats Regulations Assessment REP-081). No residual significant effects have been identified.</p>

Key concerns raised in oral and written representations	Applicant's response
<p>b. Traffic disruption</p>	<p>b) The Transport Assessment (Appendix 22.1 of the ES) (APP-448) assessed the impacts of the Proposed Development on the transport network. The effects of the Onshore Cable Corridor temporary works have been carefully considered and the changes to the operation of the highway network are temporary with the highway network returning to normal levels of operation following the completion of the works.</p> <p>A Supplementary Transport Assessment has been completed (and submitted at Deadline 1 as Appendix 11 to the ES Addendum (REP1-142)) in response to Relevant Representations and further discussions with PCC and HCC following the submission of the Application in November 2019. The assessments completed within the Supplementary Transport Assessment do not alter the findings of the original Transport Assessment (APP-448).</p> <p>The Applicant concludes in both assessments that there will be localised areas on the highway network that experience an increase in traffic levels and associated congestion as a result of the construction of the Proposed Development. However, any impacts are temporary in nature and will be mitigated through measures set out within the FTMS (REP1-068) and Framework Construction Traffic Management Plan (REP1-070) (which were both updated and submitted at Deadline 1 and are secured by Requirements 19 and 17 respectively of the dDCO (REP1-021)).</p>
<p>3. Whatever the merits are, if you are going to pick a point on South Coast to pick it should not be Portsmouth. Second most densely populated city with stresses on highway network.</p>	<p>The proposed development is the product of an extensive optioneering process, starting with a technical and economic study in 2014. The ES sets out the alternatives considered by the Applicant and the reasons why the Proposed Development was chosen (ES Chapter 2 Consideration of Alternatives and Supplementary Alternatives Chapter, Appendix 3 of ES Addendum REP1-152).</p>
<p>Councillor Steve Wemyss (REP5-134)</p>	
<p>1. Traffic and air quality concerns</p> <p>a. Failure to model traffic flows along Farlington avenue and from its junction with the B2177 and along the B2177 to the junction with the A3.</p> <p>b. No consideration to the dangers posed to primary school children by taking the route of the interconnector either immediately outside one school and within 150m of another, or within 150m of both schools on a route which services the pupils from both schools.</p> <p>c. Failure to take into account the additional traffic flow which will be generated by 320 new homes to be built alongside the A2030 just outside the city boundaries.</p>	<p>a) Assessment of the junction of B2177 Portsdown Hill Road / Farlington Avenue was not included with the scope of the Transport Assessment which assessed a worst-case traffic management scenario and was agreed with Portsmouth City Council during pre-application discussions. Traffic management would be required for approximately two weeks of the two year construction programme for the Onshore Cable Route</p> <p>b) The Framework Traffic Management Strategy (FTMS) (REP1-068) includes programme restrictions which prohibit construction works within term time as far as practically possible in locations where schools are either on, or in the direct vicinity of, the Onshore Cable Corridor. Construction work on Farlington Avenue and Eveleigh Road in the vicinity of Solent Infant School and Solent Junior School are only permitted during the school holidays.</p> <p>c) Whilst the location of the proposed development at Forty Acres Farm is within the bounds of the area considered for committed developments within the SRTM coding note, the application was for Forty Acres Farm was not approved until 17th January 2020, after traffic modelling was undertaken. As such, this development did not form committed development at the time such modelling was undertaken and was not specifically included. The SRTM modelling was however completed using a future year of 2026 for all assessments contained within the Transport Assessment (APP-448) and Supplementary Transport Assessment (REP1-142). This is therefore beyond the predicted Aquind construction programme and represents a robust assessment of traffic flows across the local highway network as a result.</p>
<p>2. Impacts on environmentally sensitive sites</p>	<p>Extensive consideration has been given to the effects of the proposed development on ecological receptors including all designated sites (ES Chapter16 Onshore Ecology APP-131, Marine Chapters 6-14 APP-121-129, Habitats Regulations Assessment REP1-081). No residual significant effects have been identified.</p>

Key concerns raised in oral and written representations	Applicant's response
<p>3. Loss of trees</p>	<p>The Applicant will only remove trees of high/medium value where their loss is unavoidable i.e. where the tree is impacted to such an extent that its physiological viability and/or structural integrity is significantly diminished such that long-term retention does not accord with arboricultural best practice. Retention or loss will be decided by a suitably trained and qualified arboriculturalist and confirmed in consultation with the Local Planning Authorities through the requirements of the Arboricultural Method Statement.</p>
<p>4. Loss of Open Space</p> <p>a. Should this scheme progress at best there would be a 20% loss of pitches for at least one season and in some instances two seasons. In the worst case it could be as high as 33% loss of provision.</p>	<p>The Applicant recognises that there will be some impacts on pitches. Application of mitigation set out in the Framework Management Plan for Recreational Impacts (Appendix- 13 of ES Addendum REP4-026)) reduces the number of affected pitches in comparison to those within the Order Limits in the ES. If pitches can be avoided and/ or relocated, there would be temporary loss of two football pitches and one disused cricket pitch at Farlington Fields; one football pitch and cricket pitch at Langstone Harbour; and one rugby pitch at the University of Portsmouth.</p>
<p>5. Precedent for refusing proposals because of adverse effect on nature conservation. Reference to 1994 case concerning Farlington Fields (copy requested by the ExA) and impacts on Brent Geese.</p>	<p>Very careful consideration has been given to the Chichester & Langstone Harbour SPA and the inter-tidal bird community and to Brent Geese. By avoiding works on the relevant sections of the Onshore Cable Corridor within the Winter season (October to March) any adverse effects can be avoided (for details see the Winter Working Restriction for Features of Chichester & Langstone Harbour SPA APP-422). Natural England has agreed that the Proposed Development would have no adverse effect on the integrity of the SPA.</p>
<p>6. Harm could come through the danger posed by the route of the interconnector passing either in front of primary school or passing within 150m of two primary schools and obviously en-route to and from those schools.</p>	<p>The Framework Traffic Management Strategy (FTMS) (REP1-068) includes programme restrictions which prohibit construction works within term time as far as practically possible in locations where schools are either on, or in the direct vicinity of, the Onshore Cable Corridor. Construction work on Farlington Avenue and Eveleigh Road in the vicinity of Solent Infant School and Solent Junior School are only permitted during the school holidays.</p>
<p>Geoffrey and Peter Carpenter (REP5-110 and REP5-111)</p>	
<p>1. Loss of family farm</p>	<p>The Applicant acknowledges the loss of farm land and continues to engage with the landowners to explore options for compensation. The Applicant sent revised and improved Heads of Terms to the landowners on 03 November 2020 and also requested further information from the landowners to enable the impact on the farm business to be assessed in more detail. The Applicant is yet to receive a response and looks forward to progressing matters with the landowner when they are able to provide the information requested.</p>
<p>2. Visual impacts</p> <p>a. "Ugly landscape"</p> <p>b. Open view to converter station with no privacy</p>	<p>a) and b) The siting, design and mitigation of the Converter Station has been carefully considered and responds to the extensive engagement undertaken with the public, South Downs National Park Authority (SDNPA) and the relevant host local authorities.</p> <p>The Applicant has sought to ensure that in closer views (primarily those immediately around the edge of the Converter Station including views from private residential properties) views are as aesthetically pleasing as possible, through a number of design measures associated with the Converter Station.</p> <p>These are referred to as design principles in the updated Design and Access Statement submitted at Deadline 6 (document reference 5.5) and consider narrow cladding of varied colour to break up the overall mass, curved corners, a rationalising of different functions of buildings to avoid visual clutter and that no</p>

Key concerns raised in oral and written representations	Applicant's response
	<p>plant would be located on the roofs of the highest buildings (refer to the Applicant's Comments on Local Impact Reports in response to Winchester City Council's (WCC) comments Table 7.6 (4.6.12) (REP2-013)).</p> <p>The Applicant is nearing agreement with the Local Planning Authorities on the drafting of the Converter Station Design Principles.</p> <p>The Applicant has also proposed a comprehensive landscape mitigation package to minimise the impacts of the Proposed Development. This includes both new planting (ranging from native mixed woodland, scrub and hedgerows) to the management and reinforcement of parts of the existing vegetation around the site.</p> <p>Existing planting has been included in the Order Limits where this is considered necessary to provide a visual screen, retain landscape and ecological connectivity and strengthen proposed features.</p> <p>Such proposals alongside new planting are reflected in the indicative landscape mitigation plans Figure 15.48 and 15.49 (document reference 6.2.15.48 and 6.2.15.49) and landscape mitigation plans for Option B(ii) (document reference 7.7.).</p> <p>The siting of the proposed Converter Station which will be cut into a natural slope will reduce potential views taken from the surrounding area. The updated Outline Landscape and Biodiversity Strategy (document reference 6.10) (submitted at Deadline 6 and secured by Requirement 7 of the dDCO (document reference 3.1)) also specifies the landscape measures that would mitigate the effects and enhance the value of landscape and biodiversity features with management prescription with reference to monitoring, management responsibilities and review requirements.</p> <p>The landscape proposals sit alongside a series of the Landscape Design Principles which have been developed to mitigate the landscape and visual impacts of the Converter Station Area, and which alongside other Design Principles are covered in the updated Design and Access Statement submitted at Deadline 6 (document reference 5.5) and secured by Requirement 6 of the dDCO (document reference 3.1).</p> <p>This is considered adequate mitigation to respond to the visual impacts of the Proposed Development.</p>
<p>3. Noise disturbance</p>	<p>The noise impacts of the Proposed Development have been fully and robustly assessed and the scope and methodology of the assessment has been agreed with the relevant local authorities.</p> <p>The Applicant's noise assessment contained in Chapter 24 of the ES (APP-139) and Chapter 17 of the ES Addendum (REP1-139) concludes that there will be negligible effects at all surrounding residential receptors during the operation of the Converter Station. The operational noise criteria (REP1-129) are secured through Requirement 20 of the Draft DCO, and these criteria will ensure that the operational effects are no greater than those identified in the ES.</p> <p>The Applicant's noise assessment has concluded that there will be no significant effects during the construction phase at the Converter Station Area. Furthermore, the best practice mitigation measures secured through the Outline Onshore CEMP (REP5-019) and the commitment to follow best practicable means as defined by the Control of Pollution Act 1974 will ensure construction noise effects are minimised.</p>
<p>4. Stress and anxiety caused by AQUIND</p>	<p>The Applicant sincerely apologise for any stress and anxiety caused by its proposals. The Applicant has sought to engage with landowners in the most meaningful and least impactful way. The Applicant has had a number of meetings with the landowners and their representatives to give them visibility of the Applicant's proposal as they have evolved over the past 4 years. The Applicant has also incorporated changes into the layout of the Proposed Development, such as moving the proposed location for the attenuation pond from</p>

Key concerns raised in oral and written representations	Applicant's response
	land the landowners specifically wanted to retain. The Applicant looks forward to progressing matters towards a voluntary agreement by the end of the Examination.
Michael and Sandra Jeffries (REP5-137)	
1. Loss of family land	The Applicant acknowledges the loss of family farm land and continues to engage with the landowners to explore options for compensation. The changes made to the Land Plans (REP5-003) at Deadline 5 shows the reduced amount of land the Applicant would acquire from the landowner in the event Converter Station Option B(ii) is progressed (noting Option B(ii) is the Applicant's preferred option). This would reduce the amount of land to be acquired from the landowner from 10074m ² to 5458m ² , a reduction of 46%. Revised Heads of Terms reflecting the changes have been issued at Deadline 6.
2. Impact on motorcross and vehicle repair workshops businesses.	<p>The Applicant does not envisage the construction or operation of the Proposed Development will have any impact on the workshops which are used for repairing vehicles.</p> <p>The changes made to the Land Plans (REP5-003) at Deadline 5 shows the reduced amount of land the Applicant would acquire from the landowner in the event Converter Station Option B(ii) is progressed (noting Option B(ii) is the Applicant's preferred option). This would reduce the amount of land to be acquired from the landowner from 10074m² to 5458m², a reduction of 46%. As the area of the motocross track is approximately 21,000m² (using a measurement taken from aerial photography), approximately 75% of the motocross track will still be available for use if Option B(ii) is chosen.</p> <p>The Applicant requested further details from the Landowner's representatives in relation to persons with an interest in land and/or users of their land on 03 November 2020 and is yet to receive a response but looks forward to progressing matters when the information is provided.</p>
3. Impact on views. The converter station would have a negative impact on view and view of neighbours. Inappropriate for countryside setting.	<p>The LVIA (APP-130) as summarised in Table 15.10 and 15.11 recognises that there would be significant effects during construction and operation on residents of Hillcrest. Effects have been identified as major during construction and major in Year 0 diminishing to minor-moderate (though significant) by Year 20.</p> <p>The Applicant made a judgement on the partial screening of the lower storeys of Hillcrest by standing in the field adjacent to Hillcrest and at the entranceway off Old Mill Lane.</p> <p>As described in Appendix 15.3 Landscape and Visual Assessment Methodology (APP-401) paragraph 1.11.7 the judgement is the assessor's "best estimate" of the likely visual effects - "Whilst most of the properties can be viewed at close range from public roads and footpaths, some of these properties are accessed via private or gated roads and due to these access limitations, they have been assessed from the nearest public road or PRow which may be at greater distance from the property. The assessment, in this instance, should therefore be regarded as a 'best estimate' of the likely visual effects." The document goes on to state in paragraph 1.11.8 that the "assessment has been further supported by aerial and ground level photography as well as map-based data. The assessment takes account of the likely views from the ground floors of properties and main garden areas but excludes upper floors and other land that may be connected with the property."</p> <p>The findings of the visual amenity assessment presented in Table 3 of the Appendix 15.6 Visual Amenity (APP-404) states that for Hillcrest, a barn and coniferous boundary planting edging the property to the south partially screens lower storey and garden views.</p>

Key concerns raised in oral and written representations	Applicant's response
	<p>In terms of proposed mitigation measures and as referred to in the Applicant's Response to Deadline 2 Submissions (REP3-014) the Applicant has introduced new native mixed woodland around the periphery of the property as indicated on the revised indicative landscape mitigation plans Figure 15.48 and 15.49 (REP1-036 and 037 respectively) and landscape mitigation plans for Option B(ii) (REP1-137) submitted for Deadline 1, the Applicant acknowledges that this will provide only a partial screen.</p> <p>The Applicant has therefore sought to ensure that in closer views (primarily those immediately around the edge of the Converter Station including views from private residential properties) views are as aesthetically pleasing as possible, through a number of design measures associated with the Converter Station. These are referred to as design principles in the updated DAS (REP1-031) and include cladding in varied natural colours designed to visually break up the overall mass, curved corners, a rationalising of different functions of buildings to avoid visual clutter and avoiding plant on the roofs of the highest buildings (refer to the Applicant's Comments on Local Impact Reports in response to WCC comments Table 7.6 (4.6.12) (REP2-013)).</p> <p>The Applicant is working with the LPAs to seek agreement on the Converter Station Design Principles.</p> <p>The location of Lovedean Substation is constrained by various factors including the position of the overhead lines to the north and south. Within those constraints, the Applicant has also sought to site the Converter Station in the most appropriate location to allow for the landscape impacts to be minimised. This has included setting the Converter Station as low as is feasible without giving rise to adverse impacts on the underlying principal chalk aquifer (which is a large chalk aquifer located under much of the surrounding area) (refer to the Applicant's Comments on Local Impact Reports in response to WCC comments (4.3.3) Table 7.3 (REP2-013)). In addition, the landform along the northern boundary of the Converter Station will be reprofiled to add to the visual screening function.</p> <p>The Converter Station is designed with a finished floor level of 85.1m AOD. Hillcrest appears to be at 99 m AOD, approximately 14 m above the Converter Station floor level, approximately 12 m below top of roof if the Converter Buildings are constructed to the maximum of 26m allowed by the Parameter Plans (REP-017). The proposed planting described above would be on ground between 95 and 96 m AOD, immediately south of the building and trees on the boundary of Hillcrest. This planting would reach height sufficient to start reducing views from the ground floor within 10 years and would provide a reasonable degree of screening from ground and first floor level by 20 years. The Applicant has amended the landscape mitigation plans to add a band of fast-growing conifers immediately south of the boundary with Hillcrest to more rapidly reinforce the screening provided by the existing trees and buildings refer to indicative landscape mitigation plans Figure 15.48 and 15.49 (document reference 6.2.15.48 and 6.2.15.49 respectively) and landscape mitigation plans for Option B(ii) (document reference 7.7.8) submitted at Deadline 6.</p>
<p>4. Stress and anxiety caused by AQUIND</p>	<p>The Applicant has sought to engage with landowners in the most meaningful and least impactful way and recognises the inevitable stress and anxiety which the proposals cause to those landowners most affected. The Applicant has had a number of meetings with the landowners and their representatives to give them visibility of the Applicant's proposals as they have evolved over the past 4 years. The Applicant looks forward to progressing matters towards a voluntary agreement by the end of the Examination.</p>
<p>Robin Jefferies (REP5-138)</p>	
<p>1. Strongly object to large building.</p>	<p>In the Design and Access Statement (REP1-034) (CB-15) Applicant has indicated that the building height of the Converter Station Halls could be between 22m and 26m. The ultimate height of these buildings is</p>

Key concerns raised in oral and written representations	Applicant's response
	critically dependent upon the design of the internal high voltage equipment. This equipment is of a modular nature, but each potential supplier will have their own optimised solution in terms of the length, width and height of their equipment. In addition, all suppliers will need to respect the electrical clearance, of about 3m, between their equipment and the floor, roof and walls of the building.
<p>2. No contact made with one of the occupiers on the Property.</p>	<p>Noting that the landowner did not respond to the Land Interest Questionnaire issued in 2018, the Applicant requested the details of the occupiers they referred to in their previous submissions on 03 November 2020. The landowner's representatives have not provided the information requested and the Applicant looks forward to receiving it in due course. In the event the landowner's is not going to provide this information, the Applicant would be grateful if they could confirm this.</p>
<p>3. Negative visual and noise impacts.</p>	<p>The noise impacts of the Proposed Development have been fully and robustly assessed and the scope and methodology of the assessment has been agreed with the relevant local authorities.</p> <p>The Applicant's noise assessment contained in Chapter 24 of the ES (APP-139) and Chapter 17 of the ES Addendum (REP1-139) concludes that that there will be negligible effects at all surrounding residential receptors during the operation of the Converter Station. The operational noise criteria (REP1-129) are secured through Requirement 20 of the Draft DCO, and these criteria will ensure that the operational effects are no greater than those identified in the ES.</p> <p>The Applicant's noise assessment has concluded that there will be no significant effects during the construction phase at the Converter Station Area. Furthermore, the best practice mitigation measures secured through the Outline Onshore CEMP (REP5-019) and the commitment to follow best practicable means as defined by the Control of Pollution Act 1974 will ensure construction noise effects are minimised.</p> <p>As referred to previously the siting, design and mitigation of the Converter Station has been carefully considered and responds to the extensive engagement undertaken with the public, SDNPA and the relevant host local authorities.</p> <p>The Applicant has sought to ensure that in closer views (primarily those immediately around the edge of the Converter Station including views from private residential properties) views are as aesthetically pleasing as possible, through a number of design measures associated with the Converter Station.</p> <p>These are referred to as design principles in the updated DAS submitted at Deadline 6 (document reference 5.5) and consider narrow cladding of varied colour to break up the overall mass, curved corners, a rationalising of different functions of buildings to avoid visual clutter and that no plant would be located on the roofs of the highest buildings (refer to the Applicant's Comments on Local Impact Reports in response to WCC comments Table 7.6 (4.6.12) (REP2-013)).</p> <p>The Applicant is nearing agreement with the LPAs on the drafting of the Converter Station Design Principles.</p>

Key concerns raised in oral and written representations	Applicant's response
	<p>The Applicant has also proposed a comprehensive landscape mitigation package to minimise the impacts of the Proposed Development. This includes both new planting (ranging from native mixed woodland, scrub and hedgerows) to the management and reinforcement of parts of the existing vegetation around the site.</p> <p>Existing planting has been included in the Order Limits where this is considered necessary to provide a visual screen, retain landscape and ecological connectivity and strengthen proposed features.</p> <p>Such proposals alongside new planting are reflected in the indicative landscape mitigation plans Figure 15.48 and 15.49 (document reference 6.2.15.48 and 6.2.15.49 respectively) and landscape mitigation plans for Option B(ii) (document reference 7.7.8).</p> <p>The siting of the proposed Converter Station which will be cut into a natural slope will reduce potential views taken from the surrounding area. The updated Outline Landscape and Biodiversity Strategy (document reference 6.10) (submitted at Deadline 6 and secured by Requirement 7 of the dDCO (document reference 3.1)) also specifies the landscape measures that would mitigate the effects and enhance the value of landscape and biodiversity features with management prescription with reference to monitoring, management responsibilities and review requirements.</p> <p>The landscape proposals sit alongside a series of the Landscape Design Principles which have been developed to mitigate the landscape and visual impacts of the Converter Station Area, and which alongside other Design Principles are covered in in Design and Access Statement (REP1-031) and secured by Requirement 6 of the dDCO (REP1-021).</p> <p>In terms of specific mitigation measures:</p> <ul style="list-style-type: none"> • Retention of existing vegetation in the form of hedgerows to the north and south which run perpendicular but contribute to visual screening. • Retention of existing hedgerow for Option B(ii) if selected. • Additional mitigation planting in Plot 1-29 to serve a visual screening function as well as providing biodiversity enhancements (approximately 50m at narrowest width including existing vegetation). <p>Plots 1-26 and 1-30 secured to provide secure screening, connectivity and add to the layering of vegetation and important in terms of landscape and ecological connectivity and biodiversity. Their retention of vegetation reflects the extensive engagement with and feedback received from the Local Planning Authorities.</p>
<p>Viola Langley on behalf of Claire Wilcox (REP5-130 and REP5-131)</p>	
<p>1. Loss of open space</p>	<p>a – c) The Applicant has, in the scheme design, sought to avoid greenspaces and recreational facilities wherever possible and it has made use of HDD where it can to avoid such impacts e.g. Milton Locks Nature</p>

Key concerns raised in oral and written representations	Applicant's response
<ul style="list-style-type: none"> a. Portsmouth most densely populated city in UK other than London. Narrow streets, people need access to open space. b. Impact on much loved areas, regularly used by 100s of people. c. Adverse impacts on physical and mental health and wellbeing. 	<p>Reserve, Milton Allotments, Eastney Beach. Where possible, it has also sought to avoid playing surfaces where open space needs to be crossed.</p> <p>The Applicant recognises that there will be some impacts and these are assessed in the ES [Chapter 25 APP-140] with appropriate mitigation proposed. This includes the Framework Management Plan for Recreational Impacts (REP4-026). The Applicant continues to discuss the mitigation proposals to further reduce the identified significant residual impacts.</p> <p>The relationship between greenspace and wellbeing is documented in Chapter 26 of the ES, with temporary impacts on greenspace during the construction stage and minor impacts during the operational stage.</p>
<p>2. Poverty and Obesity</p>	<p>The link between greenspace and obesity has been identified and assessed in Chapter 26 of the ES (paragraphs 26.5.3.1, 26.5.3.5).</p>
<p>3. Congestion/traffic</p> <ul style="list-style-type: none"> a. Need to live in Portsmouth to understand how bad traffic issues are. Even without any incidences, traffic is often at a standstill daily. b. Traffic delays and traffic re-routing 	<p>a and b) The Transport Assessment (Appendix 22.1 of the ES) (APP-448) assessed the impacts of the Proposed Development on the transport network. The effects of the Onshore Cable Corridor temporary works have been carefully considered and the changes to the operation of the highway network are temporary with the highway network returning to normal levels of operation following the completion of the works.</p> <p>A Supplementary Transport Assessment has been completed (and submitted at Deadline 1 as Appendix 11 to the ES Addendum (REP1-142)) in response to Relevant Representations and further discussions with PCC and HCC following the submission of the Application in November 2019. The assessments completed within the Supplementary Transport Assessment do not alter the findings of the original Transport Assessment (APP-448).</p> <p>The Applicant concludes in both assessments that there will be localised areas on the highway network that experience an increase in traffic levels and associated congestion as a result of the construction of the Proposed Development. However, any impacts are temporary in nature and will be mitigated through measures set out within the FTMS (REP1-068) and Framework Construction Traffic Management Plan (REP1-070) (which were both updated and submitted at Deadline 1 and are secured by Requirements 19 and 17 respectively of the dDCO (REP1-021)).</p>
<p>4. Pollution / air quality</p>	<p>The Air Quality assessments undertaken (ES Revised Chapter 23, REP 1-033) identifies no significant AQ effects as a result of the construction, related traffic emissions or non-construction traffic related emissions. The impacts associated with diversions, road closures and construction traffic impacts are transitory and temporary in nature and not predicted to impact on the ability to meet obligations under the EU AQ Directive 2008/50/EC.</p>
<p>5. Clean Air Zone objective cannot be met</p>	<p>The construction vehicles to be used will be compliant with the requirements of the Clean Air Zone and will not be subject to enforced re-routing in avoidance. It is therefore concluded that the implementation of the Clean Air Zone will not have any impact on emissions produced by construction vehicles.</p>
<p>6. Delays for essential workers. Grid locks may lead to issues for emergency services.</p>	<p>The Applicant recognises that development of the scale proposed may have significant impacts for local people, particularly those living close to the Order limits. The necessary mitigation of the Proposed Development has been extensively and robustly assessed and will be secured through the Framework Traffic Management Strategy (REP-068) and the Framework Construction Traffic Management Plan (REP1-070). This includes provisions for emergency services.</p>

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7. Effects on business/poverty	Chapter 25 (Socio-economics) of the ES (APP-140) assesses the impacts of the Proposed Development upon socio-economic considerations, including disruption, change in access to businesses (including shops and other services) during construction. The assessment concludes that effects resulting from the Proposed Development will not be significant as the effects are temporary.
8. No mitigation or financial compensation can account for this.	N/A
Trevor Stark on behalf of the Eastney and Milton Allotment Holders Association Committee (REP5-150)	
1. Background on allotments a. 224 members, 504 plots all but two of which are occupied. At present, the Eastney and Milton Allotment Holders Association Committee represents 45% of the plot holders. b. The waiting time for a plot is 3 – 4 years.	N/A
2. When the Association was first briefed in November 2019, they were led to believe there would be no impacts on allotments due to HDD.	The Applicant can confirm that HDD will be used to install the cable beneath the allotments and that there will be no impact to the allotments.
3. Now understand access rights and being sought for parts of the site. Access to plots and possible excavation activities at any time.	The Applicant's proposal has always been that the onshore cable corridor would be installed via HDD to avoid impacts on allotments. Excavation activities will not be possible. It has been confirmed through updates to the Land Plans (REP1-011a) and the Book of Reference (REP4-003) that the only rights sought over the Allotments are a right of access on foot over the existing paths only for the undertaking of visual inspections during construction to allow for checks to be made for any bentonite (a CEFAS approved non-toxic clay lubricant) breakout associated with the HDD works, and rights to temporarily access the Allotment plots for the purpose of clearing any such bentonite breakout (in the unlikely event that occurs).
4. Up to 123 plots could be affected at short notice. AQUIND could dig up plots and remove sheds.	The undertaker will not be permitted to dig up plots and remove sheds.
5. Intrusion would be worst between April – August. During this period a whole years work could be destroyed in hours and it would take a number of years to recover the status quo.	A seasonal restriction in relation to the works to undertake the HDD beneath the Allotments is not considered to be necessary and it is therefore not proposed this will be provided. Further detail can be found in the Applicants response to Action Points raised at ISH1, 2, 3 and CAH 1 and 2 (document reference 7.9.21), specifically responses to question 3.24 for ISH1 at paragraph 2.7.9-2.7.13.
6. Allotments make a contribution to wellbeing. Peaceful place to go to and substitute for exercise. Interfering with this will result in acceptable financial and emotional cost	The importance of contribution of the allotments to wellbeing is acknowledged. The Applicant can confirm that HDD will be used to install the cable beneath the allotments and it is not intending on interfering with the allotments.

Key concerns raised in oral and written representations	Applicant's response
<p>7. Ideally, would like the cables to be rerouted. Realise that this may not be possible – any necessary disruption is limited legal to winter months and financial compensation is provided to affected plot owners.</p>	<p>This has been addressed in responses to points 3 and 5 above.</p>
<p>Paula Savage</p>	
<p>1. Environmental impacts on Portsmouth – second most densely populated city suffering alarming and illegal levels of pollution.</p>	<p>The ES sets out the alternatives considered by the Applicant and the reasons why the Proposed Development was chosen, including environmental considerations (ES Chapter 2 Consideration of Alternatives, APP-117, and Supplementary Alternatives Chapter, Appendix 3 of ES Addendum, REP1-152).</p>
<p>2. Climate Emergency in Portsmouth; need to decrease pollution levels, not increase them.</p>	<p>The Air Quality assessments undertaken (ES Revised Chapter 23, REP 1-033) identifies no significant air quality effects as a result of the construction, related traffic emissions or non-construction traffic related emissions.</p> <p>Please refer to the response to comments raised by Councillor Judith Clementson at REP5-132, item 5.</p>
<p>3. Cable running along only area of natural biodiversity with Brent Greece.</p>	<p>Very careful consideration has been given to the Chichester & Langstone Harbour SPA and the inter-tidal bird community and to Brent Geese. By avoiding works on the relevant sections of the Onshore Cable Corridor within the Winter season (October to March) any adverse effects can be avoided (for details see the Winter Working Restriction for Features of Chichester & Langstone Harbour SPA APP-422)</p>
<p>4. Landfall location is a historical landfill known for vast amount of asbestos. Lack of research and AQUIND tester on site did not know the site contained asbestos.</p>	<p>The Applicant can confirm that ground investigation will be carried prior to works carried out. It should be noted that the historical landfill known locally as 'the Glory Hole' is located north adjacent to but north of the Order Limits and is understood to have contained deposited waste, including industrial, commercial and household waste This is specifically referenced at Paragraph 4.12.5.2 of Appendix 18.1 Preliminary Risk Assessment and Generic Quantitative Risk Assessment of the Environmental Statement (APP-429).</p>
<p>5. Green Energy – already have an interconnector coming into the area and don't need another.</p>	<p>The Needs and Benefits Report (APP-115) and Needs and Benefits Addendum (REP1-135) set out the need for AQUIND Interconnector in detail, including the contribution to meeting the optimum capacity for interconnection between Great Britain and France.</p> <p>Since these reports were produced the UK Government have set out further support for additional interconnection in the National Infrastructure Strategy and the contribution to a flexible network which will be capable of meeting increased demand for low carbon electricity.</p>
<p>Stephen Morgan MP (Oral submission at Issue Specific Hearing 3)</p>	
<p>1. Summary of involvement with local constituents over project and overview of position:</p> <ul style="list-style-type: none"> • Since 2018 I have been listening and representing local views. • Received dozens of letters and attended public consultation. • Have submitted evidence and written Parliamentary Questions. • Wants to formally place objection on record. 	<p>The Applicant will continue to engage with the Member of Parliament for Portsmouth South. The Applicant has undertaken consultation with the MP's local constituents throughout the DCO process. With regards the background of this consultation in relation to the specific comments made by SM we can summarise as follows:</p> <p>The cable corridor for the AQUIND Interconnector was first presented to the local community via a public consultation in early 2018 which generated local interest in the scheme. The feedback received from</p>

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	<p>residents, businesses and other stakeholders following each round of consultation has been used to refine the cable route corridor.</p> <p>The Applicant has responded to Mr Stephen Morgan in a written letter dated 16/11/2020 which seeks to provide clarity on some of the matters raised in the written representation submitted by the local MP to the Planning Inspectorate dated 4th October 2020.</p>
<p>2. Concerns over the duration of works and the traffic disruption it will cause:</p> <ul style="list-style-type: none"> • Proposal would take up to 7 years and would cause disruption to people of Portsmouth. • Will disrupt key elements of infrastructure. 	<p>The Applicant can confirm that measures will be taken to limit access disruption, but during the construction period some residential and business properties will experience temporary restrictions to vehicular access, including driveway access. Pedestrian and bicycle access will be maintained at all times, as will access for those using wheelchairs, mobility scooters and pushchairs. Generally, business and residential parking will only be impacted when construction is occurring in that immediate vicinity. It is expected that highway works will progress, on average, at a rate of 100m per week. As such, the majority of residential accesses and businesses with on-street parking are likely to only be impacted for approximately one - two weeks per circuit within the construction phase. Taking into account 100m working section and typical parking bay sizes, it can be assumed that this will be equivalent to a loss of up to 22 spaces at any one given time of on-street parking, and considerably fewer properties (5-10) where only driveway access is impacted.</p> <p>The Applicant has also considered the feedback received from residents, businesses and other stakeholders and made refinements to the cable corridor particularly in relation to the temporary impact on highways and traffic flows.</p> <p>Following feedback received during the statutory consultation between 27 February – 29 April 2019, and before submitting an application for a DCO to build and operate AQUIND Interconnector, many of the more sensitive locations of the cable corridor were either significantly reduced or removed altogether. In Portsmouth, for example, areas of Bransbury Road, Milton Road, Velder Avenue and Eastern Road were removed from the cable corridor following feedback from the local community, local authorities and other stakeholders.</p> <p>Since the submission of the Application in November 2019 changes have been proposed to reduce the Order limits, including areas of highway in the administrative boundary of Portsmouth City Council, in response to further feedback received. The Order limits as proposed in the recent submission to the ExA can be seen on the updated Site Location.</p> <p>Although temporary traffic management measures will be required during the installation of the cables, road closures will be avoided save for in very limited instances and access to homes and businesses will be maintained throughout the construction stage. No part of the proposal is located in any private homes or gardens.</p> <p>In addition, a Framework Traffic Management Strategy (REP1-068) was submitted with the DCO application which contains a range of proposed mitigation measures including restrictions on when works may be undertaken in certain locations and proximity to one another that accounts for environmental constraints, major public events, school term times and other restrictions to minimise the impact. Such mitigation includes overnight working in specific areas, including along sections of Eastern Road, to minimise the duration of the installation period and in turn the period of disruption in this area.</p>
<p>3. Disruption to residents and local traders</p>	<p>In the Applicant's deadline 4 submission, letter of response to Stephen Morgan MP (REP4-030), the applicant noted that measures will be taken to limit access disruption, but during the construction period some residential and business properties will experience temporary restrictions to vehicular access, including</p>

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	<p>driveway access. Pedestrian and bicycle access will be maintained at all times, as will access for those using wheelchairs, mobility scooters and pushchairs. Generally, business and residential parking will only be impacted when construction is occurring in that immediate vicinity. It is expected that highway works will progress, on average, at a rate of 100m per week. As such, the majority of residential accesses and businesses with on-street parking are likely to only be impacted for approximately one - two weeks per circuit within the construction phase. Taking into account 100m working section and typical parking bay sizes, it can be assumed that this will be equivalent to a loss of up to 22 spaces at any one given time of on-street parking, and considerably fewer properties (5-10) where only driveway access is impacted.</p>
<p>4. Impacts on noise, loss of natural light and dust</p>	<p>In the Applicant's letter of response to Stephen Morgan MP dated 16 November 2020 (REP4-030), the Applicant noted that it recognises the importance of minimising noise impacts arising from the construction of the proposals and the sensitivities of the immediate vicinity to any such impacts.</p> <p>The noise impacts of the Proposed Development have been fully and robustly assessed and the scope and methodology of the assessment has been agreed with the relevant local authorities.</p> <p>The Applicant's noise assessment contained in Chapter 24 of the ES (APP-139) and Chapter 17 of the ES Addendum (REP1-139) concludes that there will be negligible effects at all surrounding residential receptors during the operation of the Converter Station. The operational noise criteria (REP1-129) are secured through Requirement 20 of the Draft DCO, and these criteria will ensure that the operational effects are no greater than those identified in the ES.</p> <p>The Applicant's noise assessment has concluded that there will be no significant effects during the construction phase at the Converter Station Area. Furthermore, the best practice mitigation measures secured through the Outline Onshore CEMP (REP5-019) and the commitment to follow best practicable means as defined by the Control of Pollution Act 1974 will ensure construction noise effects are minimised.</p> <p>In relation to dust, the OOCEMP (REP 1-087) provides for local air quality and dust mitigation measures to be implemented in accordance with IAQM best practice guidelines and each phase of onshore development will have to comply with a CEMP in relation to that phase.</p> <p>The EIA process did not identify any potential impacts on natural light.</p>
<p>5. Impact on open spaces</p>	<p>The Applicant has, in the scheme design, sought to avoid greenspaces and recreational facilities wherever possible and it has made use of HDD where it can to avoid such impacts e.g. Milton Locks Nature Reserve, Milton Allotments, Eastney Beach. Where possible, it has also sought to avoid playing surfaces where open space needs to be crossed.</p> <p>The Applicant recognises that there will be some impacts and these are assessed in the ES (Chapter 25 APP-140) with appropriate mitigation proposed. This includes the Framework Management Plan for Recreational Impacts (APP 13 of ES Addendum REP-4-026). The Applicant continues to discuss the mitigation proposals to further reduce the identified significant residual impacts.</p>
<p>6. Risk to wildlife, in particular at Milton Common</p>	<p>As noted in the Applicant's letter of response to Stephen Morgan MP (REP4-030), the Onshore Ecology chapter of the Environmental Statement (ES) (APP-131) sets out the likely effects and proposed mitigation in relation to onshore ecology, as well as detail of all surveys undertaken. The Applicant confirms that mitigation has been embedded within the design of the Proposed Development and therefore inherent to the development for which consent is sought (as controlled by the parameters approach set out in ES Chapter 4: Methodology).</p>

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	Further details of mitigations are set out in the Applicant's response to Stephen Morgan MP dated 16 November 20 (REP4-030).
<p>7. Threat to allotments</p>	<p>The Applicant's proposal has always been that the onshore cable corridor would be installed via HDD to avoid impacts on allotments.</p> <p>The Applicant is only seeking pedestrian rights over the existing paths for the undertaking of visual inspections during construction to allow for checks to be made for any bentonite (a CEFAS approved non-toxic clay lubricant) breakout associated with the HDD works, and rights to temporarily access the Allotment plots for the purpose of clearing any such bentonite breakout (in the unlikely event that occurs).</p> <p>The Applicant has made amendments to Land Plans, Book of Reference and Works Plans at Deadline 5 to ensure that this is clear.</p>
<p>8. Applicant has been unable to demonstrate any positive benefit that the scheme would bring to Portsmouth</p>	<p>The project will deliver local and regional benefits through employment generation, spending and business rate generation.</p> <p>Moreover, the project will result in the net reduction of CO2 emissions by at least 1.5 million tonnes over the lifetime of the project, in addition to creating around 500 jobs through the UK onshore and marine construction phases. It is also expected that the interconnectors will play a major role in achieving the Net Zero 2050 targets as the Government formulates strategies of achieving those targets.</p> <p>In terms of employment generation whilst a large proportion of the total potential number of jobs created would be drawn from outside the region. Some aspects of construction can, however, be undertaken by local contractors and provide opportunities for local businesses – with the potential to generate around 90 regional jobs for the duration of the construction period. Workers coming from outside the region are likely to stay in the local area and would support local business through expenditure on materials and services during construction.</p> <p>Further details on the benefits of the project are contained in the Needs and Benefits Report (APP-115) and Needs and Benefits Addendum (REP1-135).</p>
<p>9. Concerns over the process followed.</p> <ul style="list-style-type: none"> a. Concerns about transparency and ability to fully assess application. b. Changes have been made, but more could be done to engage with those impacts. c. Views from residents should be given a strong hearing. d. Concerns about donations to political party and funding. 	<ul style="list-style-type: none"> a. Please refer to the response to REP5-141 above (point 8) which provides an overview of the comprehensive consultation carried out by the Applicant. The Applicant maintains that it has been fully transparent with its proposals since inception of the Project. b. Since the submission of the Application in November 2019 changes have been made by the Applicant, in response to feedback received. c. The Applicant has sought to engage with residents and has taken on board feedback throughout the application and examination process. d. The Applicant has demonstrated that the project is independently viable and that funding for the Proposed Development is likely to be available within the required timeframe (Funding Statement APP-023 and Response to ExQ CA 1.3.1 REP 1-021). The costs estimates are considered to be accurate and present a realistic understanding of the likely overall costs. They have been informed by extensive industry and contractor engagement to provide the required level of certainty for the project at this stage.

