HCC Highway Authority Update to Deadline 7

Hampshire County Council, in its role as Highway Authority, provides this update to offer further explanation in support of its position as set within the Statement of Common Ground (SoCG) at deadline 7 ahead of the February hearings. This update takes account of additional submitted evidence from the applicant at deadline 6 and further meetings held between deadline 6 and 7.

Other Consents and Licences

An updated version has been submitted by the applicant at deadline 6. This does not include reference to S278 or the permit scheme. The Highway Authority draw this to attention as it is believed this should be included, even if secured through the s106 agreement.

Access and Rights of Way Plan

The access and rights of way plan has been updated. There is no change with regards the proposed accesses within the HCC area of the network that is evident on the plans.

The proposed vehicular access at Day Lane/Broadway Lane have been set out in sufficient detail for the limits of access rights to be reduced at this point of the network. The Highway Authority can see no reason for why the extents here need to be so broad and they should be reduced as has been done elsewhere on the network where details have been progressed.

The access and rights of way plan also shows the vehicular access at Anmore Road. Some additional information has been provided by the applicant in relation to the updated standard detail for temporary accesses and additional tracking details of movements to the access. Comments on the additional information provided are set out further below in reviewing the revised CTMP.

Sustainable Travel Impacts and Mitigation

The impact on sustainable modes of transport with regards walking and cycling impacts on the highway remain a matter that the Highway Authority considers has not been fully assessed by the applicant.

Walking and Cycling

It is understood that footway and cycleway closures will be limited to only when necessary in order to physically install the cables in the footway or if required for a safe Traffic Signs Manual Chapter 8 (referred to as Chapter 8) compliant traffic management (TM) arrangement. Where footways are closed, provision for pedestrians will be provided within the Chapter 8 layouts. These details shall be submitted for approval to the Highway Authority as part of the permit scheme requirements. It's understood that PCC have requested widths of 1.2 metres to be secured for pedestrians and 1.5 metres for cyclists within TM arrangements. Although these are wider than the minimum widths set out in chapter 8, given the

traffic flow on the A3 and B2150, these requests are supported by HCC and where appropriate the standard TM arrangement details shown in the FTMS should be amended accordingly. Discussions between HCC and the applicant ahead of deadline 7 indicated that the applicant would be willing to add wording to the FTMS to reflect these additional desirable minimum widths. It is was also recognised that if this can't be achieved, HCC would accept chapter 8 compliant TM arrangements minimum widths of 1m for pedestrians and 1.2m for cyclists.

The Highway Authority are not aware of any other specific measures proposed to aid with pedestrian and cyclists' access along the route and the severance the cable laying works has the potential to cause to these routes. The extent of the potential severance issues will not be fully understood until the details of the cable locations within the order limits are known. Beyond securing controls in the FTMS for the works to provide sufficient alternative pedestrian and cycle provision, there are limited opportunities to mitigate the impact this may cause to residents.

One key area however that has not been addressed is how cyclists are being accommodated when bus lane closures are required. The applicants preferred approach to reduce the impact of traffic management along the A3 is to utilise the bus lanes for cable installation. The FTMS sets out how, 'where possible', bus delays as a result of the closure will be reduced. However, it fails to set out equivalent measures as to how cyclists using the bus lanes will be managed through the works. Chapter 8 does not include a standard detail for this type of highway arrangement and therefore bespoke TM requirements will need to be provided. The FTMS should clearly set out the need for the TM contractors to provide bespoke TM arrangements that demonstrate that consideration has been given for how to manage cyclists through the road works along the A3 to ensure that they are safely able to re-join the carriageway or for example specifically provided with a temporary cycle lane to allow continuous movement along the A3. Depending on the extent of the set up and the duration of time it will be implemented along the route the Highway Authority may require that the design is subject to safety audit in order to ensure cycle needs have been properly considered and managed.

Buses

Discussions have been ongoing with the applicant regarding the potential for a bus mitigation package to ensure the services are not significantly adversely affected by the works. The Highway Authority have previously set out its concerns regarding the impact on bus journey times within its deadline 5 submission. These concerns remain unchanged. The Highway Authority have begun to explore whether a mechanism could be secured to provide appropriate mitigation should some of the more significant impacts emerge or matters be greater than forecast.

The primary concern for the Highway Authority is the loss of patronage on the route due to delays caused by roadworks on the corridor over an extended period of time. Delays which make the service unreliable is likely to result in model shift away bus use. Aquind works will be carried out along key corridors in Hampshire which currently offer high performing commercial bus services (bus routes D1/D2 aside). It is vital that provision is made so that if the cumulative impact on bus services of the

works carried out is significant, appropriate support is in place to mitigate this impact to enable these services to continue to grow and encourage modal shift.

To achieve this, one suggestion is that a fund be put aside for bus operators. Bus operators should be able to utilise this fund to:

a) provide additional vehicles to maintain existing frequencies;
b) cover revenue shortfalls experienced if patronage drops as a direct impact of the works;
c) put financial incentives in place to retain existing users; or
d) any other measure deemed reasonable by the bus operators and the County Council.

Without the measure of a fund being put in place, the long-term viability of the impacted bus services is at risk. This risk is unacceptable to the Highway Authority and conflicts with the County Council's priority on supporting sustainable public transport and combating climate change. Without such measures, the works could also undermine the Transforming Cities Fund (TCF) project which is focused on achieving modal shift. There is a risk that public perception of the bus network in the area could deteriorate due to the overall impact of the works thus discouraging the desired, and necessary, modal shift.

It is also key to note that the services from Portsmouth and along the A3 serve as a key route to the Queen Alexandra (QA) Hospital, a major hospital serving Portsmouth and the wider area. It is also a major employer within the area and, for the foreseeable future, a hub for the COVID-19 recovery programme. It is vital therefore that access by all modes to the QA is maintained to the highest standard possible.

It is noted that within the ExA questions it has been asked for evidence of the views of the bus operators. A meeting has been held between the Highway Authorities (HCC and PCC) with the bus operators on the 21st January to discuss the application and information provided to date. The bus operators have provided the responses appended to this response in Appendix 1 and 2.

Joint Bay Technical Note

A Joint Bay Technical Note has been provided by the applicant at deadline 6 which sets out the indicative joint bay locations along the route and standard details for the joint bays with regards size and depth. A meeting was also held on the 5th January 2021 with the applicant's engineering team and officers from the Highway Authority to discuss matters of engineering detail. Whilst a separate note has been provided by the applicant at deadline 6 on this matter, it is the HA's position that the joint bays, and the associated laydown areas, are matters that should be secured under the Framework CTMP. The proposed locations of the joint bays, as now understood, should be included within the CTMP through appending this Joint Bay Technical Note.

The technical note has also set out the construction requirements based on a 0700 to 1700 hour working day, Monday to Friday and 08:00-13:00 on Saturdays. The notes indicate a 4-week period for construction of a single joint bay. The HA are concerned that these joint bay construction impacts on the highway have not been considered fully within the FTMS or the CEMP with regards the extents of full or partial closures, or presence of traffic lights on the corridor, and this should be addressed by the applicant.

Within the area that falls within the Hampshire administrative area, there are a total of 16 joint bay locations identified. Joint bays 1 to 5 are to be fully constructed and built outside of highway land.

Joint bay 6 is a double joint bay in the car park to the north of Southdown View. The overlay of the standard set up provided by the applicant doesn't take into regard the onsite hedgerow or the potential impact of the works the shared use path. The highway boundary also extends to the height barrier and therefore the joint bay will be laid within the highway here. The laydown areas are shown to also impact on the signal junction with Darnell Road and therefore the operational capabilities of the junction. Southdown View is also of a residential nature with a narrow access, however there are no assessments of the impact on residential accessibility, or impact of construction vehicles in this location, included within the FTMS. For example, will parking restrictions be required or can the required construction vehicles track the Sunnymead Drive/Southdown view junction?

Joint bay 7 is proposed in the highway on Hambledon Road service road to the south of Milton Road roundabout. The double joint bay is fully within the highway and the installation is likely to cause significant disruption for properties affected. The proposed layout would also appear to require the closure of Fennell Close for the 4 week period. It is unclear whether there is flexibility in the layout to facilitate alternative laydown and compound areas to prevent unnecessary disruption. The tracking drawings in Appendix D of the Supplementary Transport Assessment (STA) do not include tracking of the drum cable vehicles into Hambledon Road service road and this needs to be provided by the applicant.

Joint bay 8 is located within a drainage swale and therefore would not be an appropriate location for a joint bay.

Joint bay 9 is located outside the highway boundary and therefore the HA have no comments.

Joint bays 10, 11, 14, 15 and 16 are located fully within the carriageway and the proposed layout would be likely to cause traffic disruption beyond that assessed within the FTMS with the works area extending beyond the bus lanes.

Joint bay 12 is located in the verge at Campbell Crescent where there are significant services including a telegraph pole. The verge here is also supported by a retaining wall between Campbell Crescent and the footway on the A3. There is a significant area of mature landscaping, including an established tree, that will also be likely to be affected where significant damage would not be supported by the Highway Authority. The works would look to also restrict access to Campbell Crescent for

residents which has not been assessed within the FTMS. The northern access to Campbell Crescent also serves Deverell Hall (a well-used community facility) which has significant vehicular movements when in use.

Joint bay 13, whilst primarily off highway, does encroach onto the highway for the purposes of the delivery areas. No traffic management measures are proposed within this document and it's not clear if this has been accounted for in the FTMS.

Overall, it is referred to in various documents submitted by the applicant (including the Design and Access Statement), and was explained within the hearings, that joint bays where possible would not be laid within the carriageway and that it was actually in engineering terms difficult to do so. Despite this it is apparent that several locations are in fact within the carriageway. The locations and positions of the proposed joint bays are contrary to section 6.4.3 of the Design and Access Statement which clearly states "*Joint Bays should be located beyond the carriageway of the highway unless such a location is unavoidable. Where unavoidable, joint bays must be sited where their construction involves no greater constraint on the operation of the highway than traffic management associated with the laying of the onshore cable in the same location permissible in accordance with the FTMS."*

The details of the joint bays are now better understood, and it is agreed that the bays themselves are not considered a structure in their own right. However, it is evident that the joint bay positioning will impact the highway with regards additional traffic management, additional reinstatement, and additional impacts on residents' access which has currently not been clearly considered within the FTMS and the supporting appendices and therefore not represented appropriately within the CEMP.

Indemnity Requirements

The requirement for an indemnity was discussed further at a meeting with the applicant on the 5th January 2021. The Highway Authority are still of a view that it should not be subject to additional costs which would make future highway schemes cost prohibitive and prevent works from being undertaken. This is of particular concern on sections of the route where there are already planned works. Examples include the Ladybridge Roundabout with regards the MDA scheme and the TCF project works and for the provision of a bell-mouth and right turn lane onto the A3 for construction of Waterlooville MDA (known as the phase 8 construction access). It is also a concern where there are real risks of future maintenance works to the culvert south of Ladybridge Roundabout. The Highway Authority are therefore seeking the ability within the approval mechanism process secured within the DCO for indemnity to be provided where there are real engineering risks associated with the works and these are not able to be designed out or managed through works coordination.

Highway Reinstatement

The Highway Authority have discussed the requirements for highway reinstatement with the applicant and requested that the applicant produce a set of parameters for which reinstatement requirements will be agreed with the Highway Authority once the cable laying details are known. As previously set out, significant trenching of the

highway will place an additional asset maintenance burden on the authority which is not considered acceptable. The applicant, as the DCO is drafted, would not be subject to current restrictions to protect new highway surfaces that would otherwise apply to other statutory undertakers. Example parameters that the Highway Authority would like to see would be:

a) The Highway Authority therefore seek that where the applicant lays cables in the highway where a surface is less than 5 years old, that half or full carriageway reinstatement is provided.
b) The Highway Authority also seek that where the existing structure of the highway is sound, and the surface in good condition, that half or full carriageway reinstatement is provided if the trench falls within the wheel tracked area. This would decrease significantly the risks of safety defects arising during the 5 year maintenance period, and therefore the likelihood that remedial works will need to be undertaken.
c) A further requested parameter relates to the bus lane reinstatement which is currently subject of 'red' surfacing to delineate the bus route, and how this was to be managed and reinstated again in a way that would reduce the requirements for further remedial work as a result of failed reinstatements.

In the light of the above, the Highway Authority seek additional clarification on parameters to be set out within the FTMS by the applicant.

Construction Worker Travel Plan

No amendments have been provided within the deadline 6 submission to the travel plan despite clear concerns regarding its effectiveness and appropriate set up for an employment area of this type. The Highway Authority have discussed this further with the applicant and consider the following must be addressed by the applicant in a revised travel plan before the document can be agreed:

- Additional measures, as set out within the HA's deadline 5 response, for consideration and implementation as appropriate.
- Commitment to undertake staff surveys to understand where origin and destinations of works (to assess local origin locations if workforce are to be provided accommodation during the working week).
- Amendments to the monitoring requirements so that appropriate monitoring requirements can be agreed at the full travel plan stage depending on the measures being implemented.

Regarding securing the travel plan it is understood that different elements will be secured within different documents as set out below:

- Approval of the full travel plans, implementation and compliance to be secured within the DCO;
- Approval fees to the Highway Authority to be secured through the post planning PPA;
- Monitoring fees to the Highway Authority to be secured through the s106

The details surrounding these matters are yet to be agreed but this can be confirmed to cover all required elements.

Arboriculture Matters

The principle of how arboriculture matters are to be assessed and managed through the detailed design and implementation of the scheme are agreed. Matters of detailed wording remain outstanding however between Hampshire County Council's Highways Arboriculture Team (HCC Highways Arboriculture) and the applicant. The remaining specific comments are set out below:

1. The following wording within the CEMP: "*it is agreed in principle that CAVAT payments will be made to mitigate the impacts of the loss of trees and hedgerows in HCC ownership where these are not otherwise replaced"* reads that where lost trees are not replaced, a CAVAT payment will be made. This may be a misunderstanding, but this assumption is not correct. Where any trees/hedges are removed, HCC Highways Arboriculture will require a CAVAT compensation, regardless of whether the trees/hedgerows are replaced or not. The applicant is asked to confirm that this will be the case and amend the wording as appropriate.

2. It needs to be made clear within the CEMP that no highway tree/hedge will be removed unless agreement with HCC Highways Arboriculture has been reached (including the agreed compensation). Again, this is likely to be a minor wording point.

3. No tree planting will be carried out within the highway without the approval of HCC Arboriculture. This point needs to be made clear as third party trees will still need to be replaced by the applicant. The current wording requires repositioning at least 5m away from the Onshore Cable Route within the Order Limits. However, given that the Order Limits will comprise mostly highway, it is currently unclear whether this is achievable in practice without third party mitigation planting within the highway, which HCC Highways Arboriculture will not support.

4. We have previously supplied a mitigation hierarchy which should be inserted into Section 6 of the CEMP to reflect how mitigation should be considered. The hierarchy is as follows:

    - Unless a tree is structurally impaired, dead, or diseased, such that it would need to be removed for sound arboricultural management within the next five years. *Then,*

    - Ensure that cable trenching and any associated construction work, storage and traffic is excluded from the Root Protection Area (RPA) as recommended by BS5837:2012[1] or canopy spread, whichever is

[1] BS5837:2012 trees in relation to design, demolition and construction - Recommendations

largest.
If this is not possible then,

- Work within the RPA must only be done in accordance with an Arboricultural Method Statement (AMS) prepared by a competent arboriculturist and approved by HCC Highways Arboriculture. This AMS must include details of special methods and techniques that will be used, such as micro-tunnelling or air spade excavation, for example, and any methods of ground protection and physical barriers that will be needed to avoid root damage, canopy damage and soil compaction, which will cause subsequent root damage.
  If this is not possible then,

- As a last resort remove the tree(s) and provide compensation for the loss at the appropriate CAVAT value. This must be agreed with HCC Highways Arboriculture prior to tree removal.

Supplementary Transport Assessment (STA) Appendix D

Appendix D of the STA sets out the vehicle tracking along the cable laying route. This has been re-reviewed with a more detailed understanding following the hearings.

The Highway Authority are generally content with the tracking drawings presented. The u-turn manoeuvre on Hambledon Road will be undertaken via the assistance of traffic marshalls and will be undertaken outside of the AM and PM peak hours which is considered acceptable.

Areas requiring temporary suspensions to on-road parking will require a Temporary Traffic Restriction Order (TTRO) which will need to be secured through the DCO. Reviews of the DCO will need to be undertaken to confirm that these are all included as required.

Day Lane Traffic Management Strategy

Following comments raised by HCC in its Deadline 3 and 5 responses, the applicant has submitted an updated technical note which provides an updated traffic management strategy for HGV movements along Day Lane. HCC's deadline 3 and 5 responses raised the following concerns with the strategies presented at the time:

- The constricted width of Day Lane and the lack of passing places available, restricting the two way movements of HGVs. The restricted width also meant that a car and HGV could not pass throughout the majority of the highway.
- The lack of forward visibility available at certain locations along Day Lane.
- The lack of control over HGV arrivals and departures to and from the site.
- HGVs and stationary vehicles queuing within the Lovedean Lane/Day Lane junction, creating safety concerns.
- Clarity regarding the exact number of arrivals/departures to the site via HGVs.

The applicant subsequently produced a 'Revised HGV Construction Management Strategy for Day Lane' document dated 11th December 2020. Following attendance at the first Issue Specific Hearing and after reviewing the document, HCC produced a Post Meeting Note which provided further comments on the revised strategy presented within the aforementioned document.

The following comments are made following a review of the latest 'Revised HGV Construction Management Strategy for Day Lane' document dated 23rd December 2020 and submitted by the applicant at deadline 6.

Latest Amendments

To address HCC's concern regarding the lack of passing places along Day Lane, the applicant is now proposing to provide 4 passing bays on Day Lane, indicatively shown on Figure 2 of the document. Tracking drawings have also been provided in drawing numbers AQ-UK-DCO-TR-LAY-009 Rev A and AQ-UK-DCO-TR-LAY-010 for two 10.2m long tipper HGVs passing concurrently.

The principle of these passing bays is considered acceptable by HCC in highway terms although potential impacts on the watercourses/ditches, ecology and landscape need to be appraised further by the applicant and discussed with relevant authorities by the applicant. The proposed passing bays will better facilitate two-way movements of HGVs along Day Lane in collaboration with the wider traffic management strategy. This in-turn reduces the safety concerns of two HGVs or a HGV and a car meeting on Day Lane and having to reverse the full length of Day Lane to a location where suitable carriageway width is provided for the vehicles to pass.

The Highway Authority has been made aware of local concerns regarding the interaction of construction traffic with existing more vulnerable road users (walkers, cyclists and horse riders). The passing places will also aid these users. With the combined presence of banksman/traffic marshals, HGV's being managed by escort vehicles to communicate the presence of such users, and a speed limit reduction to 30mph it is considered during the hours of construction that the potential impact on vulnerable road users would be suitably managed.

Within the note the applicant has not confirmed the delivery mechanism for the passing bays. This has been discussed with the applicat and the Highway Authority consider the most efficient and timely way for these to be delivered is for the works to be included within the S278 works at the site access. The passing places will be required to be in place prior to construction and secured within the S106 agreement. It is not considered necessary for the passing bays to be removed post construction. As part of the detailed design work for the laybys, the Highway Authority would also expect the following matters to be addressed:

- Confirmation whether the laybys will be edged with kerbing or an open area of blacktop.
- Provision of a 45 degree load line.
- Tie in details to the existing carriageway to be confirmed by the applicant.

Strategic Management of HGV Movements

To control the movement of HGVs to the site, the applicant is proposing to utilise a 'check-in' system which involves the HGV drivers co-ordinating with the banksmen and traffic marshalls on Day Lane to avoid conflict with departing HGVs. A number of laybys have been identified within a 20 minute drive of the site which are primarily located on the Strategic Road Network.

The Highway Authority have concerns that the arrival system will still result in HGVs arriving over the course of the hour with no real co-ordination strategy. This will result in unnecessary delays to existing traffic on Day Lane which will need to be held whilst the HGVs approach the site.

The Highway Authority have proposed an alternative strategy to the applicant which will allow HGVs to be convoyed into the site. The system will involve holding HGVs at the existing layby on Hulbert Road, off the A3(M) Junction 3, which is under the jurisdiction of HCC as Highway Authority. Half of the layby will be coned off for use by arriving HGVs which will allow groupings of 3 HGVs to be escorted to Day Lane and the converter station. This will regulate the arrivals and reduce the period of time that general traffic is held on Day Lane. The escort vehicle can also be utilised to control vehicle speeds along Day Lane to 15mph as well as being in contact with banksman/traffic marshalls along the route so should the need arise to halt the convoy at a passing place this can be communicated. It will be necessary to secure within the CTMP and appropriately in the legal documents a requirement for the applicant to apply for parking suspensions in the layby and cover the required costs. It will also be necessary for the area to be barriered off appropriately to physically enforce the suspension and for the area to be manned during hours of operation. Consideration has been given to a TTRO on the area, but this provides very little signage and no financial means for Havant Borough Council to enforce if necessary. A parking suspension would also come accompanied by significant signage which would assist with regards making the proposal self-enforcing. TTRO's are also only valid for a period of 18 months or an alternative fixed period as agreed by the Secretary of State. This leaves little flexibility should a review of the CTMP near the end of the project conclude that the use of such a system is no longer necessary (due to very few or no further HGV movements) or if the system needs to remain in place for longer due to delays with the project.

Outbound HGV movements now involves the 'stacking' of HGVs into groups of 3 when leaving the site. During peak construction, the banksmen/traffic marshals located closest to the site will co-ordinate HGV departures to ensure that they leave in a convoy of 3 vehicles. Based on the HGV movements provided within Table 1, 9 HGV departures are expected from the site during the peak operational hours. This equates to eastbound HGVs being present on Day Lane once every 20 minutes. This revised strategy is now considered acceptable, subject to provision of a Road Safety Audit and amendments as necessary because of the audit comments along with inclusion of these vehicles being managed via escort vehicle and speeds do not exceed 15mph.

Use of Banksmen and Traffic Marshalls

The use of banksmen presented in previously proposed traffic management strategies for Day Lane has been updated in the latest technical note. The HA previously raised concern with the location of Banksman 1 and their ability to control traffic and prevent HGVs from travelling westbound along Day Lane.

The latest strategy relocates Banksman 1 into Lovedean Lane to better control oncoming traffic. While the Highway Authority agree with the principle location of the banksman, further evidence has been requested from the applicant to understand the impact on the local road network by holding traffic at the Lovedean Lane/Day Lane junction, specifically regarding the queue lengths which will be generated. This information will also be necessary for the Day Lane/Broadway Lane in relation to traffic being held for westbound vehicles.

HGV Traffic Movements on Day Lane

Table 1 of the 'Revised HGV Construction Management Strategy for Day Lane' document clarifies the expected maximum number of HGV trips to the converter station site. Of the 142 two-way HGV movements, 86 of these will be dedicated to work on the converter station area, while the remaining movements relate to the cable route and landfall.

These numbers are taken as the maximum number of daily HGV movements considered within the Day Lane traffic management strategy. The DCO should secure a legal restriction to the maximum number of daily HGV movements to the converter station site so that the Highway Authority can be confident on the effective management of Day Lane and level of disruption to general road users this will cause.

Highway Alterations to Facilitate Abnormal Load Deliveries

Within HCC's LIR response, comments were raised regarding the impact of Abnormal Indivisible Load (AIL) deliveries to the converter station. To facilitate the movement of the AILs from the Strategic Road Network to the site, it was identified that street furniture at the A3 Portsmouth Road/Dell Piece West/Catherington Lane signal junction and the A3 Portsmouth Road/Lovedean Lane junction would need to be removed and reinstated. However, comments were raised regarding the preparation work required before any signal equipment could be removed at the A3 Portsmouth Road/Dell Piece West signal junction and the requirement for HCC's contractor to be onsite whilst the signal poles are removed. It was also identified that further information was required to identify the works required to Lovedean Lane/Portsmouth Road junction to facilitate the AIL movements.

To address these comments, the applicant has produced a document titled 'Temporary Highway Alterations to Facilitate Abnormal Load Deliveries'. The document identifies the street furniture which will need to be temporarily removed to facilitate the AIL movements at both of the junctions noted above. The works will involve socketing furniture such as signal heads and street signs. With regards to the former, HCC's ITS team will be required to make any changes at the

A3/Catherington Lane signal junction given the specialist nature of the equipment (as identified in previous correspondence).

Whilst the Highway Authority are generally accepting of the temporary amendments required to facilitate the movements, questions remain over the process and triggers for making the necessary junction amendments. The works required to install the retention sockets are required ahead of the AIL movements taking place. However, it is currently unclear where the necessary timeframes are secured within the DCO and also how this will work in practice i.e. when will the Highway Authority's ITS team be informed of the required changes? How will the cost of these junction changes be mitigated? Who and under what mechanism will the non ITS work be undertaken? It is noted that one of the signs at the Lovedean Lane junction is lit and therefore requires engagement with SSE under HA's private finance initiative agreements.

The Highway Authority have made the above representation ahead of deadline 7 direct to the applicant and await a response.

Road Safety Technical Note

The applicant has produced a Road Safety Technical Note (RSTN) to address the comments raised in HCC's deadline 5 response. This response sought clarification on the traffic reassignment and the road safety implications as a result of the ongoing temporary traffic management during the construction period of the cable route. In response to this, the applicant's note comments on the selection process undertaken when determining which links required further investigation, the updated mitigation measures proposed within the FTMS and a summary of the link assessment.

Transport Assessment and Supplementary Transport Assessment Link Assessments

To understand which links will be affected by re-routing traffic, the applicant undertook a sequential test within the Transport Assessment (TA) which first identified whether the link experienced a >10% increase in traffic flow before identifying whether there was also an hourly increase of 60 or more passenger car units (PCUs). The Highway Authority agreed with this approach, although it was noted that certain links experienced traffic flow increases greater than 100%. Owing to the rural and/or constrained nature of some of these links, the Highway Authority were concerned that this would temporarily result in an increase in accidents during the construction period.

An updated traffic assessment was undertaken within the Supplementary Transport Assessment (STA) which focussed on less traffic diverting away from the cable route along the A3 corridor. Within HCC's deadline 5 response, concerns were raised with the additional queuing presented within the STA assessment which would result in severe queuing throughout the A3 corridor, particularly at junctions. It was also noted that Chapter 22 of the Environmental Statement had not been updated to reflect whether the STA assessment quantified as a negligible, minor, moderate or major impact.

The Highway Authority were therefore concerned that the traffic impacts identified within the TA and STA would not be sufficiently mitigated. Mitigation proposals were presented within the deadline 5 response for consideration by the applicant.

Proposed Mitigation

To address the concerns raised above, the applicant has subsequently presented a number of mitigation proposals, some of which are reflected within the RSTN.

One of the primary mitigation features now agreed with the applicant (but not referred to within the RSTN) is the application of HCC's permit scheme under the New Roads and Streetworks Act 1991. This will, if the final matters on night works and extended hours can be agreed, allow for the construction works to be more agile, allowing for variations as required to working hours for example (in consultation with the relevant environmental health teams if necessary) to facilitate the timely delivery of the development and reduce delay and risk of safety issues arising. The application of the permit scheme also facilitates the approval process for road space bookings, diversion plans and works coordination which in-turn allows for greater management of the traffic impacts identified within the TA and STA. The permit scheme will be secured through the DCO and is considered by the Highway Authority as an essential mitigation tool.

The applicant has also now produced a signage strategy which is detailed within the RSTN and the FTMS, the latter of which is secured within the DCO. The applicant intends to use the signage strategy in collaboration with the communication strategy to flexibly mitigate the impact of during the construction period by advising the public of upcoming delays on both the local and strategic road network. Variable message signs (VMS) will be used to update the travelling public of the intended programme of works and therefore where the delays are expected. Fixed signage will also be utilised to discourage routes identified within Appendix B of RSTN as unsuitable for high levels of re-directed traffic. Furthermore, signage will also be placed on the strategic road network which informs drivers of the upcoming delays and allows them to appropriately tailor their journeys to avoid the delays. The details of the signage strategy and the updated communication strategy are assessed in further detail below under the 'Updated Framework Traffic Management Strategy' section.

The Highway Authority also note under section 1.2.4.2 of the RSTN that a road safety officer will be provided by the applicant to continually monitor the road works to proactively engage with any road safety issues that arise. Given that the road works may result in increased traffic flows through roads serving schools, school marshalling may also be required to manage traffic flow during school drop off and pick-up times. The relevant school traffic marshals will report to the road safety officer to ensure that any identified issues are rectified at the applicant's expense if necessary. The school marshals are secured section 2.13 of the FTMS and the appointed road safety officer will be secured under the Framework Construction Traffic Management Plan (FCTMP) which is secured via the DCO.

Summary

To-date, the applicant has undertaken assessments within the TA and STA to forecast the traffic impact during the construction phase of the cable route. The Highway Authority acknowledge that with the application of the permit scheme, the implementation of a flexible signage and communication strategy which maintains traffic on the strategic road network to avoid the works where applicable and ongoing monitoring, the impact on the local road network is likely to be somewhere in-between the two assessments. While there will still be queuing and junction delay along the route which could give rise to road safety issues, this can be minimised to an extent as long as the aforementioned mitigation measures are in place. The situation will also be monitored and managed further if necessary, to ensure the highway remains operationally safe. These mitigation measures must remain flexible to adjust and react to the needs of the project to reduce queuing and maintain a safe operational highway.

Updated Framework Traffic Management Strategy

Following discussions held between the Highway Authority and the applicant to discuss matters relating to the FTMS, alongside comments raised within written representation, the FTMS has now been updated.

Night Time Working

Matters relating to the permit scheme being able to require night time working or extended working hours as discussed at the hearings remains unresolved. The Highway Authority has discussed with the Local Authorities environmental health teams and it is the HA's understanding that they are content with this inclusion and require no further assessment work. To be clear the Highway Authority are requesting that it has the flexibility that should a need arise, or it to be considered more appropriate on receipt of the detailed designs, that it can in agreement with the environmental health teams instruct longer working hours including the potential for works to be undertaken at night if justified. This matter has been raised due to the objection from the Highway Authority on the applicant's proposed closure of the A3 over a number of weekends. This objection still remains.

Public Transport

One of the key mitigation measures suggested by the applicant to minimise the impact on public transport has been that bus priority signals would be provided where bus lanes are to be closed. This has been amended in the latest drafting of the FTMS to read 'where practicable'. The Highway Authority seek clarity on the frequency of when these measures will be able to be deployed and where it is considered not to be practicable. If it isn't possible to implement the measures in the majority of cases, then there are no meaningful mitigation measures being provided to reduce delay on bus routes. This measure was referenced by the applicant at the hearings as a key mitigation for buses and if it cannot be readily implemented this is a concern. The Highway Authority would also request that the details of the proposed temporary traffic management layout and operation is provided within the FTMS regarding temporary bus gates. The Highway Authority are unclear on how

the legally required signal arrangements can be provided within a temporary arrangement.

Access to Properties, Car Parking and Communication Strategy

Representation made by the HA in its deadline 3 response sought clarification from the applicant on its strategy for providing access to individual properties during the works. This strategy would ultimately feed into the communication strategy and therefore would potentially need updating to better identify individuals who are considered vulnerable, placing more of an onus on the applicant to undertake the work necessary to identify these individuals and to also investigate how displaced parking will be accommodated.

Appendix 1 of the updated FTMS provides an 'Onshore Cable Route Construction Impacts on Access to Properties and Car Parking and Communication Strategy' document. Whilst a tracked changed version has not been provided it is evident that this document has been amended. Although it doesn't go as far as to give access to residents more readily as discussed at the hearing, it does make changes to the noticing and indicates that road plating will be available at request. Access for those who are considered vulnerable under Inclusive Mobility Guidance has been stated to be available at all times within 1 hours notice, and bespoke arrangements can be made via the dedicated free telephone number, depending on need. Whilst this is a welcome step, given the availability of alternative parking this does not consider those for example with small children. It is stated that the detailed CEMP will set out a process for identifying vulnerable people along the cable corridor. However, it is not clear why this cannot be established and secured at the planning stage. It is also not clear why this cannot be included within Appendix 1 of the FTMS rather than the more generic CEMP. This would make it clear for those approving matters post approval what the requirements are.

More specific information has been provided for alternative parking locations and the impacts on residential properties. The key missing piece of information however is the distance to these alternative parking locations. The information is also based on a lot of assumptions about parking levels and available capacity.

At Mill Road specifically, the impact of implementing a traffic regulation order (TRO) has not been considered the extended needs for parking restrictions as a result of joint bay construction. In addition when looking at the A3 the applicant has acknowledged on a number of locations that alternative parking may not be available should the assumed car parking capacity not be correct and therefore the impact cannot be mitigated. In order to conclude matters and agree these elements of Appendix 1 the Highway Authority require 4 key changes in relation to access to the document. These are:

1. Amend the definition of 'vulnerable' to not only include that as set out within 'Inclusive Mobility' but also those families with young children, with a young child being defined as those of primary age or younger.

2. Amend the notice period of vehicular access being physically prevented to an individual property to being no later than 24 hours before, as opposed to the morning of works as currently drafted.
3. Provide the distances to parking within the tables provided to demonstrate that no distances exceed the 400m and for the Highway Authority to be satisfied that where distances fall between 200-400m, or parking in the identified areas not being available as assumed, reasonable adjustments are made during construction to provide access, with these matters to be agreed within the permit scheme process.
4. Provision of a mechanism for identifying properties which are home to vulnerable people included within the FTMS.

As currently prepared, the Highway Authority do not consider the strategy to be acceptable and have communicated the changes sought above to the applicant for potential inclusion within its deadline 7 submission.

Specifically, within the FTMS it should be noted that reference under 2.5.3.3 in the FTMS has removed the requirement for residential access to be maintained wherever possible. This is not acceptable and should be reinstated.

Regarding the communication strategy as set out within sections 6- 10 of Appendix 1 of the FTMS, the strategy doesn't propose to utilise any social media channels to actively engage with the local community and travelling public effected by the road works. In addition, no approach has been made to the Highway Authorities, Local Authorities, or its partners regarding how they could assist with communicating the project more widely. Initial discussions should be held to understand what is possible, what methods of communication are already well established for this type of project and for the strategy to set out these measures and a greater commitment for all parties to work together in order to minimise the impact of the works on the residents and highway users.

Framework Signage Strategy

To supplement the FTMS and communication strategy, the applicant has produced a Framework Signage Strategy (FSS) to mitigate the impact of re-routing traffic by:

- Providing signage on the Strategic Road Network which informs drivers of the roadworks, allowing them to adapt their journey to avoid the delays where possible.
- Providing signage on the local road network to advise of roadworks within the vicinity of the cable corridor.
- Providing signage to discourage the use of certain alternative routes which have been identified as unsuitable for large volumes of re-routed traffic.
- The use of Variable Message Signs (VMS) to flexibly adapt the message based on the section of road being worked on at that point in time.

The purpose of the FSS is to reduce the forecast levels of queuing presented in the TA and STA junction modelling reports by communicating and reporting to drivers the planned roadworks to adjust their journeys accordingly.

The FSS proposes the location of signage at both a strategic and local level. An overview of these locations is provided in Figure 3 of the document. VMS signs are proposed along the A3(M) between junctions 2 and 5 to keep drivers on the strategic road network (where possible) to avoid the delays on the A3 and the assessed link roads. The location of the signage will need to be agreed in consultation with Highways England.

On the local road network, a mixture of advanced warning, fixed repeater and VMS signs are proposed to advise of roadworks, sign routes suitable as an alternative route and discourage the use of other routes and provide messages regarding any delays, accidents, or upcoming information to be aware of.

The Highway Authority are broadly in agreement with the proposed signage strategy which will need to be adapted based on the works at different points in the project. Similarly, to the FTMS, the FSS should be a live document which is amended by the appointed contractor close to the start of the works and subsequently updated to reflect the agreed signage locations. Additional signage should be included on the A32 at Droxford and further north on the A3. The Highway Authority would also request confirmation of how agreement for placement of signs and use of signs on the Strategic Road Network has been secured within the application. Experience from its own schemes has shown this can be problematic in practice and thus it is considered to be a fundamental part in achieving any reduction in traffic flows along the cable route.

General Comments on the FTMS Drafting

More general the Highway Authority have the following specific comments on the FTMS.

- Paragraph 2.6.1.1. of the FTMS states that Provisional Advance Authorisations will be obtained “typically 3 months before works in a location are scheduled to be undertaken”. This section should be updated to read that the approvals will be obtained at least 3 months before works start to ensure that the necessary road space booking can be obtained. It should also be noted that section 2.6.1.2. is not part of the permit scheme and would need to be approved separately.
- Paragraph 2.13.1.2. states that mitigation can be directed by the Highway Authority in the event that there are road traffic accidents which require immediate action. Emergency events such as gas leaks, burst water mains and loss of customer service also fall under this category but have not been noted within this section of the FTMS.
  Section 6.7 of the FTMS specifies work times for one of the sections of the cable route. This does not provide the Highway Authority with the flexibility to request night works in certain busy locations of the route. The wording in the FTMS should therefore not commit to working times/days. These matters should be considered through consultation with HCC as part of the permit process.

Updated Construction Traffic Management Plan

Anmore Lane Access Requirements

Tracking drawings have recently been provided by the applicant for the temporary construction access on Anmore Road. The tracking demonstrates that a large tipper lorry can egress the site, although it is noted that this manoeuvre will be close to the proposed onsite security fencing. The applicant should consider setting the fencing further back to avoid any conflicts with the swept paths of lorries.

To achieve the tracking for vehicles routing to the Mill Road/Anmore Road junction, a TTRO is required to prevent on street parking. The applicant has not specified how long the TTRO will be required, nor where alternative means of parking are expected to take place. These matters will need to be addressed before the Highway Authority can be comfortable with this approach. Whilst the tracking movements can be achieved, they do overhang the footways at the junction of Mill Road/Hambledon Road and require all road space at the junction for the manoeuvre. No assessment has been taken in this area at school drop off and pick up times.I If the proposed access is to be acceptable, restrictions will need to be secured within the CTMP to prevent construction traffic arriving and departing during these times.

More generally a question has been asked of the applicant on why access to Kings Pond Meadow cannot be achieved via the field to the north, or the construction access from Hambledon Road to the south. HCC are waiting for a response from the applicant on these matters. Access from these locations would prevent the need for any lorry routing via the residential roads in Denmead in close proximity to Denmead Infant and Junior Schools and would be welcomed from a highways safety and amenity perspective.

Temporary Construction Access Standard Detail

The drawing has been updated by the applicant in light of the Highway Authority's comments raised at deadline 5. This has addressed the matters raised in HCC's deadline 5 response with regards to the visibility requirements at the temporary construction accesses. The drawing is now considered acceptable to set the principle form of the construction access. The details will be agreed on a site by site basis through the S278 design check process prior to the entering of a s278 minor works agreement as appended and secured within the emerging draft of the s106.

Site Access

The site access works as shown on drawing AQD-WSP-UK-OS-DR-Z-200215 Rev 04 are still pending a Road Safety Audit and amendments relating to the banned right turn signage.

Within the FTMS the 30mph speed limit is shown on drawing EN020022-ESAPPENDDIX-22.1.G.1shal Rev 2. The proposed temporary 30mph limit should be extended for the full length of Day Lane and be in place for the full length of the construction programme.

Highway Condition

Following further discussions with the applicant, it has been agreed that pre-condition surveys of the permitted construction traffic routes, along with the location of temporary construction access locations, will be undertaken to rectify any damage caused during the construction period. Weekly surveys will also be undertaken to rectify any areas identified as hazardous to road users. These remedial works will be agreed via consultation with the Highway Authority and implemented by the applicant.

The Applicants Response to Issue Specific Hearings

The Highway Authority have reviewed the responses made by the applicant in relation to the hearing post meeting notes. The following comments are made:

DCO Hearing

Agenda Item 3.12 the position set out by the applicant is agreed with HCC as Highway Authority subject to suitable drafted provision in the DCO and S106 Agreement.

CPO Hearing

A post meeting note was required as a result of the issue specific hearings on the CPO rights from the applicant to determine a process for identifying when easements for cables being laid below the highway were being enacted and for how this is to be agreed. It is agreed that the DCO requires the details of the cable including its depth to be agreed with the Highway Authority. It is then stated it will be for the applicant to determine if based on features within the Highway whether the depth is within or outside of the highway limit. This should be determined in conjunction with the relevant highway authority, who know their asset best and the draft DCO should include this within the specific requirements being reviewed and approved for the cable details, noting that approval of this element may not be possible till construction has commenced on particular sections.

Appendix 1 – Representation from First Group

From: Jonathan Lewis [redacted]
Sent: 24 January 2021 15:27
To: Cook, Lisa; Drury, Holly
Cc: Chris Chester; zz_marc.reddyatfirstgroup.com; Shelley, Peter; Guymer, Tim; Flynn, Steven
Subject: FW: Aquind works

Hi Lisa/Holly,

The position from First is that we are incredibly concerned by Aquind's comments alleging that bus operators are not bothered by the impacts of the works that Aquind is planning to carry out. It is also of significant concern that Aquind is claiming that the potential impacts they have modelled won't actually happen so no further mitigation is required.

Firstly, it is not a correct representation of the conversation that was held between Aquind and First on 08 October 2020 to allege that First/Bus Operators are not bothered by any impacts of the works planned by Aquind, and at no point during these conversations was it ever agreed that further mitigation would not be required. Whilst hypothetically modelled scenarios were raised by Aquind, it must also be noted that at no point were the actual impacts of these planned works confirmed or even quantified.

The fact of the matter is that where Aquind plans to carry out works in bus lanes, whether it be along the A3 or the Eastern Road A2030, this will most definitely cause delays to our services. There is absolutely no question about this. Delays will be incurred by the works that Aquind plans to carry out.

The full scope of actual delays that will be caused by the works planned by Aquind will be dependent upon the following factors which remain unquantified:

- How many stretches of works Aquind intends to carry out simultaneously at any one time
- Which actual streches of road will these works affect at any one time
- Where Aquind plans to carry out work in bus lanes what remaining width of carriageway remains available for traffic, and in particular, bus use
- What diversionary routes may need to be followed
- Actual traffic flows on any potential diversionary routes as a result of the works that Aquind is planning

Furthermore, it also needs to be noted that the resulting delays and impacts to traffic flows that will be incurred by the works that Aquind plans to carry out will not only affect those bus services with routes that serve the stretches of road where Aquind plans to carry out their proposed works, but in actual fact it will also affect and cause delays to the rest of our network in the Portsmouth area, as diversionary traffic flows and transport users seeking to find alternative routes to avoid the stretches of road wherever Aquind works may be taking place will cause congestion and slow traffic flows across other roads in the area that will inevitably cause significant delays across our whole Solent area network.

There is already well evidenced proof that with only 3 main roads (of which the Eastern Road A2030 is one) serving traffic flows in/out of Portsea Island, once just one of these roads becomes affected by any kind of delay to traffic flow, the other two roads very quickly become congested as traffic users seek alternative routes.

It is indisputable therefore that mitigation in the form of compensatory funding to bus operators will be required as a result of the works planned by Aquind.

Aquind will be required to provide funding to bus operators from the very date these planned works commence at the cost of £120,000 for each and every additional vehicle bus operators will need to source and deploy to maintain frequencies across their whole networks as a result of each delay incurred by the works carried out by Aquind.

It will also be an absolute requirement that Aquind also provides compensatory funding to bus operators for each and every passenger that bus operators lose as the works are carried out The works planned by Aquind will most certainly cause some bus users to shift to other modes of transport and there is no guarantee that after the works are carried out these passengers will chose to shift back to bus.

To summarise, we do have very real concerns about the scope and scale of delays and negative impacts to our whole Solent are network that will undoubtedly be caused by the works Aquind is planning to carry out, and as a result we do strongly and firmly adhere to the fact that we will require Aquind to provide compensatory funding from the very date these planned works are due to start, not only for each and every delay to our services no matter how long or short, but also for each and every bus passenger we lose from the commencement of these works.

Kind regards,

Jonathan

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Jonathan Lewis
Commercial Manager
First Hampshire, Dorset and Berkshire

Appendix 2 - Representation from Stagecoach

Stagecoach South
Chichester Bus Station
Southgate
Chichester
PO19 8DG

Friday 22nd January 2021

Dear Holly Dury,
Hampshire County Council,

Thank you for inviting me to yesterday's *Teams Meeting* to discuss the impact of the Aquind Interconnector project on the highway network, and therefore our local bus network, in Portsmouth and South Hampshire. As we discussed with you there were a number of points that we felt needed further clarification from Aquind following our most recent meeting with their consultants WSP in October. We continue to find it very difficult to quantify the full impact of their works until we understand the detail of what they propose, this was a point that was made directly to Aquind in our meeting with them. There are some concerns that remain and I thought it would be useful to highlight some of those and the potential solutions that we might have available.

The key to our local bus operation is to be able to deliver our timetable reliably and to ensure that buses are able to move quickly and consistently through the local road network. This is a fundamental part of the *Transforming Cities Fund* projects which are ongoing in Portsmouth and South Hampshire, focussing on delivering reliable and faster journey times.

We have reviewed the Framework Traffic Management Strategy and note that this gives some indication of the scale of individual works and the impact that these might have on our bus services but the scheduling of the works and the detail of the individual Traffic Management Plans still leaves lots of detail unknown. The Strategy does include notes that bus lane closures are less disruptive than general traffic closures but this does not acknowledge the more effective use of road space that buses provide, especially when the available road space is limited during periods of localised traffic management.

Where roadworks are likely to cause significant direct disruption to our services, particularly around Havant Road and the A2030 in Cosham, there will be additional resource requirements to ensure that we can still deliver the same frequency and to provide connections which might otherwise be broken. In other areas, we might expect delays to journeys and our preference is to introduce amended timetables to ensure that we can still deliver our service reliably - where journey times are extended or additional delays are expected, again this would create a requirement for additional resources as well as making taking the bus less appealing. We

would expect that Aquind would cover the cost of additional resources where they are required and support a mechanism that would allow proactive action to be taken, rather than reacting to delays once caused.

This is especially of concern on Portsea Island where delays on Eastern Avenue are likely to have an impact on the key parallel corridors where journey time consistency and the resilience of the local road network is already a challenge. An additional 3 minute delay in each direction on a service running every ten minutes, can quickly require an extra bus in the cycle to maintain the same frequency - without delivering any benefit to the customers using the service. Where multiple roadworks are taking place along a route small individual delays can combine to create significant disruption.

We are keen to continue to understand the impact of the works and support a collaborative approach with the local highways authorities to minimise the impact on our customers. As those details become clearer, we can provide further information on the cost of providing additional capacity to maintain our local bus network.

Yours Sincerely,

[redacted]

Richard Middleton
Interim Commercial Manager
Stagecoach South