

## **WCC PAPER No. 1**

### **Winchester City Councils General Views on dDCO revision 5**

Winchester City Council has submitted comments on previous drafts of this document at the earlier deadlines in the Examination. Most recently at Deadline 5. These submissions to the Ex A have been mirrored by discussions with the applicant which have resulted in some, but by no means all the suggested changes being adopted.

The Councils main comments on the content of the current dDCO revision 005 are set out in the attached version of that document. The observations are shown in red text and where appropriate, a short commentary is attached to explain the position taken by the Council.

As the Authority which will host the Converter Station, the Council believes it is important that the document is as clear as possible for the benefit of all parties. This specifically applies to those individuals who will have to manage the requirement submissions and subsequent interpretations of the Order. The Council considers that it is essential for the delivery of the requirements that the dDCO is as clear as possible.

In previous comments, the Council has proposed that the structure of requirements 7-9 is revised to make them more clear and explicit in terms of what they seek to address. These requirements also touch on matters such as landscaping and biodiversity management that will run long into the future which makes their understanding even more important as different personnel will become involved. The Council still believes that action would add clarity to the document and asked the ExA to consider this proposal as detailed in the Councils submission at deadline 5, which is document REP5-093 in the Examination Library. However, the applicant has not adopted those suggestions and consequently the Council in this submission will seek to improve the document within the existing structure set out by the applicant.

The applicant's decision to retain R7-9 unchanged has implications on sections within the Outline Landscape & Biodiversity Strategy Rev003 dated 23 December (REP6-038) which references back to the requirements. This lack of clarity is considered to reinforce the view that there is uncertainty in what R7, R8 & R9 are

intended to achieve. Further confusion is added by references in the OOCEMP (PRE6-036) to planting and future management of features and the land.

A number of new additional requirements are proposed relating to the following:

- An Employment and Skills Plan
- No start UK side until French side has all approvals

Regarding the Employment and Skills Plan, an Employment and Skills Strategy document produced by the applicant is currently under discussion with the applicant and other interested parties. Once agreed and submitted at Deadline 7c or Deadline 8 then this document could be referenced in any requirement.

Notwithstanding the applicants presentation during the hearing in December 2020, recent indications of continued uncertainty over the ability of the applicant to secure the necessary consents on the French side of the Channel only reinforces the merits behind the “No start”.....requirement.

These two new requirements have been added to schedule 2 at appropriate locations within the document.

End.

25 January 2021

