

M3 JUNCTION 9 NATIONALLY SIGNIFICANT INFRASTRUCTURE PROJECT

Deadline 5 Submission – 22 September 2023

Please find enclosed Winchester City Council's response to the Examining Authority's Questions (ExQ2).

During Issue Specific Hearing 3, it was confirmed that WCC would meet with the Applicant to discuss Climate mitigation measures, with particular reference to operational emissions. In paragraph 3.2.2 of the Council's written summary (REP4-051), the City Council indicated it would provide an update at Deadline 5.

A meeting between the City Council and the Applicant took place on 5 September 2023. Formal meeting minutes have not been issued. At the meeting, the applicant explained the differences in study areas in the comparable schemes shown within Appendix 14.3. The City Council has consistently highlighted that the operational emissions for the M3 scheme are unreasonably high in comparison. Following the explanation provided by the Applicant, it is clear that the data provided in Appendix 14.3 is not a true comparison due to the differences in the study areas. Whilst the Applicant highlighted this is the reason the data was placed in a separate appendix, its inclusion whatsoever is questioned as it does not present any useful information to compare the emissions with other schemes. As such the City Council is unable to compare emissions with other schemes.

The Carbon Neutrality Action Plan (CNAP) was also discussed as the Applicant has discounted this document as motorway emissions are excluded from the Council's Action Plan.

The reason for this exclusion is because motorway emissions are beyond the scope of the Council's control. The CNAP indicates that a motorways are *national infrastructure which require a national response*.

The NSIP process is part of that *national response* referred to and the Council disagree that the overall aims of the CNAP should be discounted by the Applicant.

The Applicant has provided the Council with a clear comparison of the mitigation measures used for the A417 Missing Link NSIP and the M3 Junction 9. It is clear from this submission that similar mitigation measures are being provided compared to the A417 scheme, however this was not demonstrated clearly due to its presentation across a number of documents.

The Council highlighted that this demonstrates the presentation of the Applicant's mitigation is not acceptable or clear. Mitigation measures are spread across different documents with no clear method to secure the details.

The Applicant also highlighted that the M3 Junction 9 Scheme is included with the National Highways Net Zero Highways plan as this assessed schemes in the pipeline.

During the meeting, the City Council requested that:

- The Applicant produce a single document which includes all Climate mitigation. This would allow the single document to be included as a Requirement and provide security to the City Council that the mitigation and measures would be delivered and not lost in the general submissions made.
- The Applicant provide any further security that the scheme has been considered more generally by National Highways as part of their wider Net Zero Plans.

In an email received 13 September 2023, the Applicant provided links to existing documents and confirmed the below –

“Regarding further mitigation and offsetting mentioned, including amending speed limits or a Hydrogen Plant, National Highways confirm that no further mitigation is required under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 given that the assessment concludes no significant effects and therefore no additional mitigation will be included in the application for the Scheme.

Regarding a dedicated annex to list climate measures and quantifying figures. As noted in the meeting, we are not in a position to be able to quantify figures at this point in the Scheme. We have taken instruction that a dedicated annex will not be produced and National Highways position on this will not change. This would be a duplication of information which is already available within the application documents. It is not a requirement. This will be our position at Deadline 5.”

The City Council acknowledge the restrictions of current policies including NSPNN and LA 104 in the assessment of GHG impact and mitigation. The City Council had hoped to work collaboratively with the Applicant in order to obtain as much mitigation as possible following the declaration of Climate Emergencies for all host authorities and the adoption of the Carbon Neutrality Action Plan.

The City Council also note the recent Government announcement (20 September 2023) which delays the sale restrictions on petrol and diesel vehicles and the transition to electric vehicles. The applicant in their submission notes that *‘the banning of the sale of petrol and diesel cars by 2030, and the decarbonisation of the National Grid, is anticipated to continue to reduce the GHG emissions associated with the Scheme over time’* (14.19.8) As the restriction has been postponed, clarification on the impact of the recent announcement is required from the Applicant.

The requests of the City Council to obtain a single document outlining mitigation alongside an assessment of how the scheme functions with the Applicant’s wider Net Zero plans are not unreasonable. The Applicant has unfortunately not agreed to work with the City Council on these points. This is a missed opportunity and for this reason the City Council will not be able to reach agreement with the Applicant on Climate.

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Examining Authority Second Written Questions (ExQ2) – Response 22 September 2023

ExQ2	Question	Response
Q2.2.1	<p>In ISH2, the question of increased Nitrogen levels in soil was specifically raised. The Applicant has responded to this in their Deadline 4 submission, Applicant written summaries of oral case for Issue Specific Hearing 2 (ISH2) [REP4-035] and in the updated ES Environmental Statement - Appendix 8.3: Assessment of Operational Air Quality Impacts on Biodiversity [REP4-020].</p> <p>Please provide any comments on this or advise the ExA if you accept the assessment and conclusions provided.</p>	<p>Assessment and conclusions are agreed.</p>
Q3.2.1	<p>At ISH2, it was stated that PM2.5 in Easton Lane has increased in the last year. Please can WCC provide details of PM2.5 readings from their monitoring stations in the city and vicinity of the application boundary for the past 5 year.</p>	<p>At ISH2 discussion took place regarding monitoring at Easton Lane regarding PM2.5 as this area is a vulnerable community. We would like to explore this further with the Applicant.</p> <p>Winchester City Council have only one MCERTS certified Particulate analyser (FIDAS 200) based on St Georges Street in the City Centre.</p> <p>This was installed in early 2020. The annual mean results are as follows:</p> <p>2020 – 10 ug/m3 2021 – 9 ug/m3 2022 – 10 ug/m3</p>

		As far as Winchester City Council is aware there is no other PM2.5 data available and there is potentially some confusion between monitoring and modelling data.
Q3.2.3	At ISH2, WCC stated that they are required to produce an air quality action plan by the end of 2024 which include national and local contributors to air quality, particularly for PM 2.5. Can WCC explain if there are any provisions, monitoring or mitigation that would be appropriate to include in the application in advance of that plan being finalised.	<p>The situation has just been clarified with DEFRA. Winchester City Council will need to produce a new Air Quality Action Plan (AQAP) only if data for 2023 and 2024 shows there remains failures of the annual mean air quality objective for nitrogen dioxide within the Air Quality Management Area (AQMA). PM2.5 is not a parameter considered by this AQMA.</p> <p>Separate to this, DEFRA now requires a wider Air Quality Strategy (AQS) to be produced by all Local Authorities, which aims to minimise ill health outcomes. Winchester City Council propose to have an initial AQS in place by mid-2024. This will include the consideration of PM2.5 and we will be looking at ways to reduce exposure from all localised sources including the domestic, agricultural and transport sectors.</p>
Q6.2.3	Please comment on the applicants proposed 'Carbon Budget Delivery Plan' shown in their response to Deadline 4, in Appendix A of the Applicant Comments on Deadline 3 submissions [REP4-037].	<p>The Applicant's response summarises the increase in GHG emissions and contextualises this in a national context against the UK's 4th, 5th and 6th Carbon Budgets.</p> <p>It is clear from this that the increases arising from the proposed scheme are working in the opposite direction to that required by the CBDP.</p> <p>This is underlined by the Climate Change Committee's report of 28th June 2023 which recommends that national road schemes should contribute towards meeting the budgets and not the opposite direction.</p>
Q6.2.4	Please confirm that it is agreed that the Winchester Carbon Neutrality Action Plan is not applicable to the scheme given that it states that the scope of the Action Plan will exclude motorways as these are national infrastructure and will require a national response. If that is not	<p>The council's Carbon Neutrality Action Plan (CNAP) contains our analysis and plans to meet our 2030 target of Carbon Neutrality as a district.</p> <p>Transport is responsible for generating 55% of the carbon emissions within the Winchester District. The CNAP therefore</p>

	<p>agreed, please explain why you consider it to be a relevant and important consideration</p>	<p>contextualises and incorporates regional and central government policy requirements covering transport policy including <i>Net Zero Growth for Transport</i> and Hampshire County Council's emerging Local Transport Plan 4. These are captured in the revised CNAP 2023-2030 which was adopted by our Cabinet on 13 September 2023 which sets out targets for reducing transport emissions that would be impacted by the additional traffic flows generated by the scheme.</p> <div data-bbox="1196 507 1697 1082" data-label="Figure"> <table border="1"> <caption>District Emissions 2020 Share of emissions by source</caption> <thead> <tr> <th>Source</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>Motorways</td> <td>20%</td> </tr> <tr> <td>A roads</td> <td>15%</td> </tr> <tr> <td>Minor roads</td> <td>18%</td> </tr> <tr> <td>Transport</td> <td>35%</td> </tr> <tr> <td>Domestic</td> <td>16%</td> </tr> <tr> <td>Commercial & Industrial</td> <td>7%</td> </tr> <tr> <td>Other</td> <td>5%</td> </tr> <tr> <td>Gas</td> <td>3%</td> </tr> <tr> <td>Electricity</td> <td>7%</td> </tr> <tr> <td>Other</td> <td>4%</td> </tr> <tr> <td>Electricity</td> <td>2%</td> </tr> <tr> <td>Gas</td> <td>3%</td> </tr> </tbody> </table> </div>	Source	Percentage	Motorways	20%	A roads	15%	Minor roads	18%	Transport	35%	Domestic	16%	Commercial & Industrial	7%	Other	5%	Gas	3%	Electricity	7%	Other	4%	Electricity	2%	Gas	3%
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<p>Q6.2.8</p>	<p>The SoCG between the Applicant and WCC [REP4-030] indicates that for the topic of Climate Change with the exception of one item, all the other issues remain under discussion. Please indicate which, if any, of these matters is anticipated to be resolved and agreed before the close of the Examination</p>	<p>WCC have requested that a single document is submitted to cover mitigation and offsetting. The Applicant has so far declined to produce this.</p> <p>We have also asked for a response on a number of mitigations and offsetting, namely:</p> <ul style="list-style-type: none"> - Creation of a Carbon Fund 																										

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Q6.2.9	<p>The WCC position is that the increase in emissions of 160,624,500 tCO₂e over the 60 year lifespan is significant and the scheme must be designed to be carbon neutral as a minimum to meet both the WCC's policies but also those of the Climate Change Act 2008. (i) Please explain further how you have assessed the increase in emissions to be significant and what comparative have you used to make that assessment. (ii) Please clarify the level of emissions you would regard as not being significant and explain why you consider that to be the case. (iii) Do you consider that the increase in submissions would be significant in</p>	<p>The City Council acknowledge the restrictions of current policies including the NSPNN and LA 104 in the assessment of Climate and GHG mitigation. We would however like to make the following comments:</p> <p>i) The council has assessed the emissions to be significant based on the guidance produced by the Institute of Environmental Managers and Assessors. The document '<i>Assessing Greenhouse Gas Emissions and Evaluating their Significance</i>'. In addition, the Council's Sustainability Manager has reviewed the figures required to achieve the Government's <i>Net Zero Growth for Transport White Paper</i> and find that the SE England transport emissions trajectory would be exceeded. It is considered</p>

	<p>the NPSNN paragraph 5.18 sense in that they would have a material impact on the ability of Government to meet its carbon reduction targets. If so, please explain why you consider that to be the case.</p>	<p>recommendations in the Committee on Climate Change's 2023 Report to Parliament in which it recommends:</p> <ul style="list-style-type: none"> a) The planning system must have an overarching requirement that all planning decisions must be taken giving full regard to the imperative of Net Zero; and b) R2023-148 Conduct a systematic review of current and future road-building projects to assess their consistency with the Government's environmental goals. This should ensure that decisions do not lock in unsustainable levels of traffic growth and develop conditions (which can be included in the Roads Investment Strategy 3 process and beyond) that permit schemes to be taken forward only if they meaningfully support cost-effective delivery of Net Zero and climate adaptation. <p>Finally, 2023 has continued to see a number of climate records exceeded and globally we have reached a 1.3 degree temperature rise against the Paris Convention to limit global temperature increases to less than 1.5 degrees.</p> <ul style="list-style-type: none"> ii) WCC would like to see the scheme contribute to a reduction in emissions (e.g. through design, traffic speed management, mitigation and offsetting). However as the suggested mitigation has not been quantified we have been unable to see what impact this has at present. iii) WCC highlight that the recommendation R2023-148 of the Climate Change Committee's 2023 Report to Parliament is sufficient evidence that the CCC is concerned about the impact of national road schemes in generating future road traffic growth and demonstrates the impact of this and other schemes has in pushing the UK over achieving its Carbon Budgets. The CCC has made this an urgent recommendation to be completed in 2023. It is clear it would not make this recommendation
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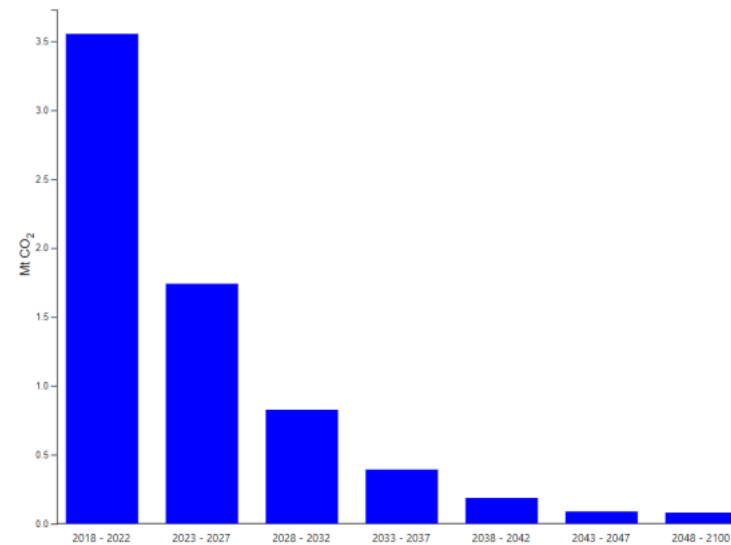
		<p>if it felt large road schemes such as the M3 Junction 9 upgrade had no impact on achieving the UK's legally binding carbon budgets.</p>
<p>Q6.2.10</p>	<p>In the SoCG between the Applicant and WCC [REP4-030] the WCC position is that the scheme must be redesigned to be carbon neutral as a minimum, if necessary, using mitigation or offsetting to achieve this. (i) Please outline the further details that you seek in relation to mitigation and offsetting and what are your proposals for further mitigation and/or Carbon Offsetting Funds that would result in the scheme being carbon neutral. (ii) In relation to the provision of Carbon Offsetting funds, what level of funds are sought and how would that be secured and utilised.</p>	<p>WCC have requested that a single document is submitted to cover mitigation and offsetting. The Applicant has so far declined to produce this.</p> <p>We have also asked for a response on a number of mitigations and offsetting, namely:</p> <ul style="list-style-type: none"> - Creation of a Carbon Fund - Consideration of lower speed limits through the zone to lower traffic emissions - Consideration of additional design elements to support the Government's Net Zero Growth for Transport e.g. compound to be 'design ready' for a hydrogen fuelling hub or EV charging zone for HGVs/coaches/cars post construction - Contribution towards cycle routes in the area - Tree planting or purchase of Carbon Credits that would cover the increase in emissions generated by the scheme. <p>We consider the current list of mitigations shared to be, in effect, a list of current good practice. It includes a large number of items that are adopted as standard by the applicant such as lighting, low temperature asphalt that are now used as standard in all road schemes. There are no offsetting measures offered over that have been quantified by a calculation of carbon impact making it impossible to judge the impact against the carbon increases arising from the scheme.</p> <p>ii) The UK ETS (UK Emissions Trading Scheme) had a price in 2022 of £83/tCO₂e. This would equate to</p> <p>Construction emissions (37,070 tCO₂e): £3,076,810 Operational emissions (2,690 tCO₂e): £223,270 per annum</p>

<p>Q6.2.12</p>	<p>The Climate Emergency Planning and Policy Post Hearing submissions [REP4-042] Section 5.5 deals with the issue of the Tyndall carbon budget for WCC which was mentioned at ISH3.</p> <p>(i) Please summarise and clarify your position in relation to the relevance of local carbon budgets to this application?</p> <p>(ii) Please comment on the value of the carbon emissions from the scheme being assessed in the context of the Tyndall Centre budgets, both for WCC and for Hampshire as a whole.</p>	<p>i) The concept of carbon budgets is an important one. The IPCC Special Report “Global Warming of 1.5°C” has estimated the quantity of CO2 that can be emitted globally and still be consistent with keeping global temperatures well below 2°C and pursuing 1.5°C. The report gives different budgets for different temperature rises and probabilities.</p> <p>The Tyndall Centre Carbon Budgets reports have selected from the IPCC report a global budget figure of 900,000 MtCO2 as the basis of their work. Keeping global warming to below 1.5°C with at least 66% probability corresponds to current global emissions rates for less than 10-14 years.</p> <p>ii) To help understand the magnitude and pace of carbon reductions required, the IPCC Special Report 2021 estimates the amount of carbon we can emit globally to stay within certain temperature rises. Following this, the Tyndall Carbon Budget Reports has provided UK local authority areas with budgets for energy related CO2 emissions from 2020 to 2100. They are informed by the latest science on climate change and carbon budget setting.</p> <p>The Carbon Budget reports estimate the carbon budget for the UK to be 3,737 MtCO2 . This represents the UK operational carbon budget across all sectors.</p> <p>Tyndall Carbon Budget Report for Winchester recommends the following:</p> <ul style="list-style-type: none"> - Winchester City Council should stay within a maximum cumulative CO2 emissions budget of 5.2 MtCO2 for the period 2020-2100. If emissions continue at 2017 levels, the entire carbon budget for the area would be used within 6 years (from 2020) i.e. by 2026; - Emission reductions should average a minimum of -13.9% per year;
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- Net zero should be achieved no later than 2041; and vi. Meeting the budget must not rely on carbon offsets.

In context, the annual carbon emissions report for the Winchester District shows emissions in the district are reducing at an average of 2.6% per annum, and not the 13.9% required to meet the Paris Agreement (now incorporated into law). We therefore believe there is not only considerable value but that it is essential that the carbon impact be assessed against the framework of local carbon budgets to see the whole picture, both for Winchester and Hampshire areas.

Tyndall Centre estimation of remaining carbon budget (from 2020) for Winchester staying “well below 2°C and pursuing 1.5°C temperature rise. Aviation and Shipping are regarded as a national overhead and not included in local budgets. Image not to scale.



5-yearly carbon budgets for Winchester's total contribution, showing the pathway for staying “well below 2°C and pursuing 1.5°C” global temperature rise. Reductions in carbon emissions associated with buildings need to, at the least, mimic this trajectory. Data source: Tyndall Centre Carbon Budgets Report.

		<p>We also would like to see a comparison provided by the applicant of emissions from the scheme to the SE area emissions. It seems the emissions arising from the scheme would contribute to missing the carbon reduction targets set out in the Government's <i>Net Zero Growth for Transport White Paper</i> and find that the SE England transport emissions trajectory would be exceeded.</p>
Q6.2.13	<p>The Climate Emergency Planning and Policy Post Hearing submissions [REP4-042] Section 5.4 includes criticism of the WCC's significance statement. He does not agree that a significance assessment of "moderate adverse" or "major adverse" can be transmuted to "minor adverse" (and not significant) by "mitigation, offsetting and monitoring measures. His position being that "No amount of mitigation or offsetting is going to bring this assessment down to the level of "minor adverse". Please comment upon the criticism made by Dr Boswell in this respect and explain why you consider that such measures would bring the assessment down to the level of "minor adverse".</p>	<p>WCC would like to give the applicant an opportunity to put forward additional measures covering mitigation, monitoring and offsetting and to give these full consideration.</p> <p>The City Council acknowledge the restrictions of current policies including the NSPNN and LA 104 in the assessment of Climate and GHG mitigation but in light of the context have made a number of suggestions and have invited the applicant, as the experts in this area, to also put forward additional proposals. At present we are not able to confirm whether the mitigation put forward, or any mitigation presented in the future, would bring the assessment down to 'minor adverse' due to the lack of detail.</p>
Q9.2.6	<p>In response to ExQ 9.1.14 [REP2-084] WCC expressed concerns as regards the 5.0m deviation for work numbers 1j and 1m. Following discussion of this matters at ISH2, can WCC indicate whether those concerns now been overcome? If not, please explain why they regard the LoD as excessive and provide your alternative drafting for the LoD in the draft DCO for these works?</p>	<p>Following confirmation from the applicant that the ES has taken account of the deviations as a worst case scenario, this concern is addressed.</p>
Q9.2.13	<p>At ISH2 the matter of whether the hours of operation set out in Requirement 3(2)(b) are</p>	<p>We are satisfied that the Noise and Vibration Plan (Appendix L) now included in the revised first iteration of the EMP provides an acceptable</p>

	<p>reasonable and necessary was discussed. WCC in its post hearing submissions [REP4-051] confirms that they are content with the working hours proposed. There are however a number of exceptions which would allow the applicant to construct outside of these hours. The SoCG between the Applicant and WCC [REP4030] records that WCC seeks a greater understanding of the likelihood of exceptions and work required. Applicant : Please provide clarification on the likelihood and frequency of those exception events occurring and details as to what they would entail. WCC: Please indicate whether any drafting amendments to this requirement are sought to overcome your concerns in relation to the exceptions set out.</p>	<p>commitment and methodology (in principle) to resolve potential impacts associated with works out of core hours. We are therefore not seeking any drafting amendments at this stage.</p>
<p>Q9.2.17</p>	<p>The SDNPA LIR [REP2-071] and WCC response to ExQ1 [REP2-084] raise concerns in relation to the drafting of this requirement including in relation to the proposed archive mitigation provision. This matter was discussed at ISH2. The SDNPA Deadline 4 post hearing submission [REP4-047] indicates that the SDNPA has been in correspondence with the Applicant, and provided draft DCO Requirement 9(6) is amended to make reference to matters being “agreed” with the City Archaeologist, then this would be sufficient to address its concern. The SoCG between the Applicant and WCC [REP4-030] confirms that the City Archaeologist is satisfied that the revised wording provides WCC with security in terms of any agreement on archiving. The Applicant’s written summaries of oral case for ISH2 [REP4-035] confirms that the amended wording to Requirement 9(6) has been</p>	<p>The revisions to requirement 9 (6) are considered sufficient. The need for a s106 for a financial contribution is no longer required.</p>

	<p>agreed and the Draft DCO will be updated accordingly at Deadline 5. (i) Please confirm that subject to that further amendment of R9(6) the drafting of this article is agreed and that you are satisfied that the revised drafting would be sufficiently satisfactorily achieve and secure the aims and enforce provision of the funding that you seek and that the issue of the need for a s.106 agreement to secure a financial contribution towards archive deposition is no longer being pursued?</p>	
Q9.2.19	<p>The prospect of a 'design code' being agreed and potentially secured by a draft DCO requirement was discussed at ISH1 and also at ISH2. The Applicant's written summaries of oral case for ISH2 [REP4035] confirms that it is preparing a draft code of design principles which would be secured as part of Requirement 12 of the draft DCO and that this would be submitted at Deadline 5. The Applicant will look to share the document before then with local authorities but that failing this a form of the document would be submitted at Deadline 5 (i) Please ensure that an update in relation to the progress of discussions between the parties on this topic including an explanation of the design principles included in the draft design code and any related draft amendments to Requirement 12. (ii) If the document has been shared prior to Deadline 5, please provide any suggested drafting amendments to the Draft Design Code and/or Requirement considered to be necessary to secure such provision at Deadline 5.</p>	<p>The draft design code has been kindly shared by the applicant prior to Deadline 5 on 12 September 2023.</p> <p>Winchester City Council will undertake a full review of the document. However, based upon an initial review, the Design Code does not contain specific detail of the design measures but includes rather generic principles duplicated from other documents. The document also appears to exclude specific details for the non-motorised routes.</p> <p>WCC will review the document in more detail following its formal submission and continue to work proactively with the applicant.</p>
Q11.2.2	<p>Given the WCC response to ExQ 11.1.1 and 11.1.2 [REP2-084]: (i) Please confirm that you</p>	<p>(i) WCC are content with the drafting of the Archaeology and Heritage Outline Mitigation Strategy.</p>

	are now content with the contents and drafting of the Archaeology and Heritage Outline Mitigation Strategy. (ii) Please confirm that you are content that appropriate provisions and contributions for the installation of and ongoing management and maintenance of on-site archaeological interpretation do not need to be secured via a s.106 legal agreement. If not, please explain why Requirement 9 of the draft DCO would not provide sufficient safeguards in that respect.	(ii) Appropriate provisions and contributions can be secured by Requirement 9.
Q12.2.1	The ExQ 12.1.2 asked whether consideration had been given the production of a specific 'design code' or 'design approach document' which would establish the approach to delivering the detailed design specifications. This matter was also discussed at ISH1. The Applicant's written summary of oral submissions for ISH1 [REP4-034] confirms that it will summarise the design principles outlined in the Design and Access Statement [APP-162] into a specific document by Deadline 5. Please provide an update in relation the progress of this document and whether any specific design principles/objectives and the means whereby this could be secured through the draft DCO have been agreed between the parties?	<p>The draft design code has been kindly shared by the applicant prior to Deadline 5.</p> <p>Winchester City Council will undertake a full review of the document. However, based upon an initial review, the Design Code does not contain specific detail of the design measures but includes rather generic principles duplicated from other documents. The document also appears to exclude specific details for the non-motorised routes.</p> <p>WCC will review the document in more detail following its formal submission and continue to work proactively with the applicant.</p>
Q12.2.4	The WCC response to ExQ 12.1.3 [REP2-084] suggests that as regards the proposed changes to the landform within the SDNP, you believe that the open downland would be harmed by raising the levels as the natural line of the topography will be affected and that further consideration on the levels and ultimate topography is required to ensure the nature of the open downland is not harmed. Given the Applicant's response to ExQ	No further comments to make from a WCC perspective. However, defer to colleagues at the South Downs National Park Authority for their view as the relevant consideration concerns land within the Park.

	12.1.18 [REP2-051] and in the light of the additional information provided by the Applicant on this topic [REP4-034], please indicate whether you have any outstanding concerns in relation to this and outline any further mitigation that is sought?	
Q12.2.13	The WCC response to FQ 12.1.3 [REP2-084] sought further mitigation in the form of wider swaths of planting of at least 25m in depth along the SDNP edge of the M3 for screening and tranquillity with planting also at the top of slopes. Please confirm your position in relation the need for planting of this depth and indicate whether any further mitigation over and above that which is being proposed is considered necessary	No further comments to make from a WCC perspective. However, defer to colleagues at the South Downs National Park Authority for their view as the relevant consideration concerns land within the Park.
Q12.2.14	The Applicant's response to ExQ 12.1.19 [REP2-051] endeavours to summarise and explain ways in which the scheme would seek to increase overall connectivity between Winchester and the SDNP by the end of the construction period and achieve long-term permanent improved connectivity across the local PRoW network as a whole by Year 15. Please summarise your position as to the anticipated improvements in connectivity and accessibility set out any outstanding concerns as regards how this is proposed to be achieved and secured by the draft DCO.	The applicant has worked with WCC prior to submission in order to upgrade the routes and improve access to the National Park which is a key priority for both authorities. Specifications including width and surfacing are important. It was expected that the Design Code would include details on these points however this has not been found in the current draft.
Q13.2.3	Please confirm if there are any specific monitoring requirements anticipated for night working during the construction phase and indicate if this is a matter which is sufficiently referenced in the environmental management plans and secured in the DCO.	WCC are satisfied that the Noise and Vibration Plan (Appendix L) now included in the revised first iteration of the EMP provides an acceptable commitment in principle regarding night-time noise monitoring. We are therefore satisfied that the final technical detail of such monitoring can be resolved with the stated further liaison prior to the 2nd iteration of the EMP and associated NVMP

Q13.2.5	Following discussions at ISH2, please explain if and how construction and post construction noise and vibration monitoring will be undertaken, if there are remaining differences between the applicant and WCC regarding this, please explain what they are and the current position of each party.	<p>Construction Phase - WCC are satisfied that the Noise and Vibration Plan (Appendix L) included in the revised first iteration of the EMP provides an acceptable commitment (in principle) regarding noise monitoring. We are therefore satisfied that the final technical detail of such monitoring can be resolved by the stated further liaison prior to the 2nd iteration of the EMP and associated NVMP</p> <p>Post construction– Our position remains unaltered regarding this matter and we await proposals from the applicant. We expect a post construction validation report to be provided to demonstrate noise mitigation measures are performing in accordance with the assumed acoustic specification modelled with the EMP.</p>
Q14.2.6	As the main employment area for Winchester, can WCC explain how the proposed application will benefit the Winnall Industrial Estate and what currently limits economic growth.	<p>This question has been discussed with the Council’s Economic Development and Tourism service who have discussed issues with local businesses.</p> <p>The proposed enhancements will improve the economic vitality and competitiveness of the Winnall Industrial Estate which is very close to the site.</p> <p>Businesses are currently put off by the congestion or the potential of congestion making the area less appealing to new businesses relocating to the area. There have already been planning applications approved for non-business class uses in this main employment area including residential halls of residence.</p> <p>Winnall based businesses are experiencing increased journey times for staff visiting clients and deliveries as well as making it harder to attract and retain staff due to the traffic issues and unpredictable journey times.</p> <p>At the moment there are limited active travel (walking or cycling) options. The workforce wishing to use active travel to get to work will benefit from the paths connecting Kings Worthy and Winnall and Long Walk and Easton Lane</p>

		<p>The improvements should reduce journey times for businesses and regular traffic congestion.</p> <p>A business owner commented:</p> <p>“I can confirm that historically any slight incident has always had the tendency to back up the whole of the Winnall Estate and routes into the current roundabout which was a real problem for us when we were located on Moorside Road and in all honesty is still a challenge from our new location in Kings Worthy as the majority of our staff and visitors have to use the Winnall roundabout still.</p> <p>The nature of our business means that many staff often have to travel to visit sites / clients so this has caused us challenges over the years, we are optimistic that an improvement to this junction will help to alleviate these pressures by improving movements on the road network.”</p> <p>The local business community have lobbied for years for improvements to enable free-flowing links between the M3 and the A34 both northbound and southbound and further comments have been provided below:</p> <p>“The proposed scheme at M3 Junction 9 will reduce congestion and improve journey times which will have a positive impact on Winchester City Centre. At busy times Junction 9 struggles and the new proposals will increase capacity at this key transport interchange and remove the need for vehicles to use Winchester as an alternative route.”</p> <p>“Having worked in Winchester for thirty-five years I am all too aware of the traffic chaos that occurs in the city during Bank Holidays or at peak periods when the M3 Junction 9 cannot</p>
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		<p>cope with the volume of traffic. Not only does this have a detrimental effect on the businesses in Winchester but has a seriously negative affect on air quality. A free-flowing junction 9 would negate the need for motorists to use Winchester as a short cut.”</p> <p>Excellent transport links are also crucial to the ongoing vitality of the visitor economy of the Winchester District. The improvements will reduce journey times from many destinations with visitors’ choice of destination strongly influenced by drive time from their homes.</p>
Q14.2.11	<p>The NPSNN paragraph 5.152 states that: “There is a strong presumption against any significant road widening or the building of new roads and strategic rail freight interchanges in a National Park, the Broads and Areas of Outstanding Natural Beauty, unless it can be shown there are compelling reasons for the new or enhanced capacity and with any benefits outweighing the costs very significantly”. Whilst Applicant position is that the overall aim is to improve the existing M3 junction 9, it is acknowledged that this would involve the provision of areas of widening and new carriageway.</p> <p>(i) Having regard to the extent of the road widening proposed, the degree of incursion into the SDNP that would occur, and the recognition and protection given to National Parks by the NPSNN, please provide a summary of your position as to whether or not the scheme should be regarded as ‘significant road widening’ in the SDNP rather than an existing road junction improvement project. (ii) In the event that the scheme is considered by the SoS to fall within the category of ‘significant road widening’, please</p>	<p>(i) Whilst it is acknowledged that part of the scheme does involve the requirement to widen the road, it is considered that this forms part of a wider junction improvement scheme.</p> <p>(ii) Should the development fall within the category of ‘significant road widening’, as this relates to a National Park consideration WCC wish to defer to colleagues of the National Park Authority and have no further comments on this point.</p>

	clarify and explain your position as to whether there are compelling reasons for the new or enhanced capacity and whether any benefits would outweigh the costs very significantly	
Q14.2.14	The NPSNN para 5.153 states that: "Where consent is given in these areas, the Secretary of State should be satisfied that the applicant has ensured that the project will be carried out to high environmental standards and where possible includes measures to enhance other aspects of the environment". (i) Please summarise your position as to whether the SoS could be satisfied that high environmental standards would be achieved and comment on the inclusion of measures to enhance other aspects of the environment. (ii) Please indicate whether there are any other measures to enhance other aspects of the environment that are still sought, or, in the case of the Applicant proposed, since the submission of the application.	WCC are broadly satisfied with the environmental standards however remain of the opinion that further GHG mitigation is required. As this requirement relates to a National Park consideration, WCC wish to defer to colleagues of the National Park Authority and have no further comments on this point.
Q14.2.19	As the main employment are for Winchester, can WCC explain how the proposed application will benefit the Winnall Industrial Estate and what currently limits economic growth.	Please see response to Q14.2.6
Q16.2.20	In the Applicant Written Summaries of Oral Case for Issue Specific Hearing 2 (ISH2) – Appendix A, paragraph 1.5.3 [REP4-035], the applicant has provided traffic data to show the change in traffic flow on the Hockley Link. Please comment on how you see this affecting the local highway network and impact on pedestrian crossings.	The additional information within paragraph 1.5 of REP4-035 is noted. As Highway Authority, WCC defer to Hampshire County Council to confirm the survey data is acceptable. WCC's concern relate to the traffic signals at this junction. To summarise, to allow the additional traffic it is presumed that (at some point in the future) traffic signals will be altered to prioritise M3 traffic to prevent queues onto the motorway. At ISH2 it was confirmed by the Applicant that there are no intentions to alter the signals however this will be kept under review. Any alterations

		<p>to the signals as part of a future review must consider the traffic impact on the B3335 and Hockley Link and provide safe pedestrian crossing points on the Hockley Link.</p> <p>WCC do however appreciate that the County Council as Highway Authority will be involved in any amendments to signalling and will therefore engage with the Highway Authority at the relevant point in the future.</p>														
Q16.2.26	<p>The Winchester Movement Strategy has been highlighted in LIRs and at the ISHs. Can HCC and WCC explain what traffic modelling has been undertaken to assess the changes that the strategy could deliver on traffic volumes, travel times across the city, road safety and air quality.</p>	<p>The Winchester Movement Strategy (WMS) has been informed through extensive public consultation and traffic modelling. The public consultation resulted in 3,000 people sharing their views on traffic and travel in Winchester. Traffic and travel data was also collated as summarised in the following table:</p> <p><i>Fig.3 - Evidence base sources and data</i></p> <table border="1" data-bbox="1182 742 1800 1082"> <tbody> <tr> <td>Census 2011, Office for National Statistics</td> <td> <ul style="list-style-type: none"> Population Travel to work - mode share, flows </td> </tr> <tr> <td>School Census 2017, Hampshire County Council</td> <td> <ul style="list-style-type: none"> Mode share Location </td> </tr> <tr> <td>Traffic counts, Hampshire County Council and Department for Transport</td> <td> <ul style="list-style-type: none"> Time-series Peak hours and directional </td> </tr> <tr> <td>TrafficMaster, Department for Transport</td> <td> <ul style="list-style-type: none"> Average link journey time Average link speed </td> </tr> <tr> <td>Parking and park and ride data, Winchester City Council</td> <td> <ul style="list-style-type: none"> Indicative parking occupancy Park & Ride parking ticket sales </td> </tr> <tr> <td>Telephone survey, Hampshire County Council</td> <td> <ul style="list-style-type: none"> Residents' views on transport issues, challenges and opportunities </td> </tr> <tr> <td>Real Time Passenger Information System, Hampshire County Council</td> <td> <ul style="list-style-type: none"> Bus journey times between stop per journey and average per day </td> </tr> </tbody> </table> <p>The WMS made use of a strategic transport model (Sub Regional Transport Model – SRTM) to test proposed measures, and in addition VISSIM modelling was undertaken to test feasibility options for alterations to the city centre movement layout which considered the potential to make changes to traffic movement and release space for public realm improvements. The VISSIM model included the proposed changes to J9 in the Do Minimum Scenario.</p>	Census 2011, Office for National Statistics	<ul style="list-style-type: none"> Population Travel to work - mode share, flows 	School Census 2017, Hampshire County Council	<ul style="list-style-type: none"> Mode share Location 	Traffic counts, Hampshire County Council and Department for Transport	<ul style="list-style-type: none"> Time-series Peak hours and directional 	TrafficMaster, Department for Transport	<ul style="list-style-type: none"> Average link journey time Average link speed 	Parking and park and ride data, Winchester City Council	<ul style="list-style-type: none"> Indicative parking occupancy Park & Ride parking ticket sales 	Telephone survey, Hampshire County Council	<ul style="list-style-type: none"> Residents' views on transport issues, challenges and opportunities 	Real Time Passenger Information System, Hampshire County Council	<ul style="list-style-type: none"> Bus journey times between stop per journey and average per day
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		<p>A review of the most recent five year personal injury accident information was also incorporated into the WMS and used to inform the development of strategies such as overcoming barriers to walking and cycling.</p> <p>The WMS is supported by two detailed feasibility reports which assessed a number of options to deliver on the three strategic priorities of the WMS. This included expansion of Park and Ride services and associated bus priority measures, walking and cycling measures, public realm improvements linked to changes to the one way system and city centre car parking capacity changes. The WMS and supporting feasibility studies can be accessed via the following link: Strategic transport - plans and policies Hampshire County Council (hants.gov.uk)</p>
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Winchester
City Council