



AQUIND Limited

AQUIND INTERCONNECTOR

Consultation Report – Appendix 1.7G Marine
Specific – Briefing Note for Ongoing
Consultation with Historic England August
2019

The Planning Act 2008

The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations
2009 – Regulation 5(2)(q)

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Natural Power Memorandum			
To	Historic England	Date	August 2019
From	Natural Power	Ref.	1199525

Briefing Note to inform Ongoing Consultation: Responses to PEIR feedback

The following table provides a summary of key items contained within feedback response on PEIR, gratefully received from the Historic England.

This briefing note is structured in order to provide information to reviewers as to how the applicant proposes to address the comments received as part of the s.42 consultation process.

Item No.	Topic	Comment	Applicant's Response
1	Marine Archaeology	In general, we are largely content with the impact assessment for archaeological receptors, in terms of the potential impacts considered, the size of the study area, and the range of datasets included at this stage. However, we wish to make the following comments with regards to the installation methods proposed, the archaeological assessment, and the mitigation measures suggested.	Acknowledged.
2	Marine Archaeology	We acknowledge that the current methodology for the installation of the cable at the landfall site is Horizontal Directional Drilling (HDD), which will emerge in the intertidal zone approximately 1km seawards from the transition joint bays in the car park behind Fraser Range. This method should be mindful of the potential to encounter archaeologically significant deposits within the sediment profile, and as such a strategic programme of investigation should be conducted to assess the potential of the deposits.	This will be considered in the Written Scheme of Investigations (WSI) produced post-consent as part of the conditions of the Deemed Marine Licence (DML). It is currently proposed that an Outline WSI will be submitted with the DCO application.
3	Marine Archaeology	We understand that a range of pre-installation clearance and preparation works may be required, including clearance of mobile bedforms, boulders, seabed debris, out of service cables, disposal of excavated material and UXO clearance, although UXO clearance will be consented through a separate marine licence. It should be noted that such activities could potential cause serious damage to features of the marine historic environment is present within the area to be impacted by the development. As such, suitable mitigation measures should be developed in consultation with the archaeological curator.	Acknowledged. It is currently anticipated that the WSI will incorporate a Protocol for Archaeological Discoveries (PAD) for those activities being consented under this DCO/DML. As the detonations of UXOs will be carried out under a separate marine licence, any impacts and mitigation measures required will be considered under that application. At this time,

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			it is expected that the Marine Management Organisation (MMO) will consult with relevant bodies including Historic England when determining a future application for UXO detonations. .
4	Marine Archaeology	We note that installation methods may include burial simultaneously with cable-lay, pre-lay burial or post-lay burial, with installation methods including trenching, ploughing and dredging. In some instances, non-burial cable protection methods, such as mattresses and rock placement, may also be required. All of these methods have the potential to seriously damage archaeological features, should they be present within the area to be impacted by the development. We further note from the documents that it is the intention to install the cables using in-line joints, but that it is possible that omega joints may be required in some places. This will increase the area impacted by the works. As such, suitable mitigation measures should be developed in consultation with the archaeological curator.	Any omega joint used would not extend beyond the currently assessed Marine Cable Corridor and as such any likely impact under the worst-case scenario has already been assessed. The mitigation currently proposed is therefore deemed sufficient and the WSI will include details of mitigation measures including a PAD and Archaeological Exclusion Zones (AEZs).
5	Marine Archaeology	Installation methods may require the use of grounding, within the intertidal area, and/or anchor spreads to maintain their position during installation. Both grounding and the use of anchors should also be mindful of archaeological features and follow mitigation procedures developed for the project. Additionally, we note that there is the potential for the use of 'flotation pits' to facilitate the installation of the cable within the nearshore area. It should be noted that the excavation of potentially large areas of the seabed could have a significant impact to both surface and burial archaeological features. This methodology would require careful mitigation to prevent impacts to the features of the marine historic environment.	<p>The use of flotation pits is note currently proposed for inclusion in the final project description, and therefore will not be assessed in the final ES.</p> <p>Grounding of vessels and anchor spread will be assessed further within the final ES however, as any impact will likely be within the Marine Cable Corridor it will be subject to the already proposed mitigation.</p>
6	Marine Archaeology	We are therefore disappointed to note that paragraph 14.4.8.3 states that 'as the design and construction methods for the Proposed Development are still evolving at the time of writing of this chapter,	The use of flotation pits and TSHD for pre-lay trenching for construction/installation of the cables is no longer proposed and will not be

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		<p>not all the proposed construction methods have been assessed.' Those not assessed include; the use of flotation pits to permit vessels to approach closers onshore, grounding of installation vessels, use of a TSHD to create the pre-lay trench. As these are some of the methods with the greatest potential for interaction and impact to heritage assets, to not include them within the preliminary environmental assessment makes it difficult for us to assess the full potential impact of the scheme. We therefore request that further information regarding these methods is included within the EIA.</p>	<p>included within the project description for the final ES.</p> <p>All other proposed construction methods will be fully described and assessed in the final ES.</p>
7	<p>Marine Archaeology</p>	<p>Additionally, we find that the information provided within Chapter 3 is insufficient to determine the maximum impacts of these techniques, in terms of both seabed surface and sediment depth to be impacted. Whilst we acknowledge that some of this information is presented within Appendix 3.2 'Marine Worse Case Scenarios' this should usefully be presented within the main chapter.</p>	<p>Acknowledged.</p> <p>As more detailed information is gathered and the project description finalised, the worst-case scenario will be updated in the final ES and presented in the main chapter.</p>
8	<p>Application</p>	<p>We understand from the documents we have received that the project is being designed to reduce the need for operational maintenance. Some inferences are made to the need to apply for an additional marine licence for operational maintenance should it be required, but it is unclear which activities are being sought for consent through this application and which will be sought separately. This should be clarified in any forthcoming application for consent.</p>	<p>It should be noted that many maintenance activities do not require a marine licence including:</p> <ul style="list-style-type: none"> • the removal and replacement of defective cable sections • removal of sediment to undertake repairs • the removal / replacement of cable protection to access the cable <p>However, where appropriate, further detail on operations and maintenance activities such as in-service inspection surveys and potential repairs / replacements will be provided within</p>

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			the project description. Any potential significant environmental effects will be assessed accordingly within the final ES.
9	Marine Archaeology	Sub-section 14.2.2 'Legislation' of Chapter 14 states that there are no Scheduled Monuments within the Proposed Development or ASA. This must be clarified to distinguish this comment as relating to below MHWS as the map of the ASA in Figure 14.1(same Chapter) clearly shows that the ASA buffers extends over not only Fort Cumberland (a scheduled monument) but also over a significant proportion of Portsmouth, Southsea and Langstone Harbour where further designations are present.	<p>Figure 14-1 shows the data collection search area (ASA), but the presented gazetteer is then restricted to the Marine Cable Corridor. So yes, the data collection buffer extends onshore, but only marine and intertidal elements are taken forward in this chapter. Onshore receptors - such as Fort Cumberland - are discussed within the relevant onshore chapter.</p> <p>Figure 14.1 will be updated to make this clearer.</p>
10	Marine Local	Within paragraph 14.2.3.4 of Chapter 14 reference is made to the UKMPS (2011), as per our previously advice, but considering that this is the primary national planning policy for the marine environment it is unclear why it is given only two sentences of explanation, as opposed to the several paragraphs reserved for the NPPF. Further detail on the role and relevance of the MPS should be included. Similarly, further detail on which policies within the South Inshore and South Offshore Marine Plans are of relevance should also be included.	<p>Noted. A more thorough consideration of South Marine Plan Policies will be included as part of the DCO application.</p> <p>It should be noted that when a marine plan is adopted, it replaces the UK MPS as the marine policy document. It is also important to highlight for Nationally Significant Infrastructure Projects (NSIPs) such as the Aquind Interconnector, the primary planning documents are the UK National Policy Statements (NPS), in this case NPS EN-1, and only regard needs to be had to the South Marine Plan when determining the Aquind DCO application.</p>
11	Marine Archaeology	We acknowledge from Appendix 14.2 'Marine Archaeology Technical Report' that geophysical and geotechnical data, consisting of sub-bottom profiler, multibeam bathymetry echo sounder, side scan sonar, magnetometry data, vibrocores and Cone Penetration Tests	The 100% terminology is not fully applicable for magnetometry data as the magnetometer is taken in lines across the assessment area rather than a wide area scan as with the side scan

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		<p>(CPTs), was collected by MMT in November 2017 to March 2018. The geophysical datasets were assessed to be of good quality, with the exception of the magnetometer which was of average quality, though all datasets were still acceptable for archaeological assessment. We note from Appendix 14.2 that the surveys were run at 60m line spacing for the offshore section of the MCC (greater than 10m LAT), and that below 10m LAT (inshore section) the line spacing was 25m. However, it is not clear whether this methodology was successful in achieving 100% or greater coverage of the seabed from the text.</p>	<p>sonar. However, we are able to confirm that the data provides a full coverage assessment of the area.</p>
12	<p>Marine Archaeology</p>	<p>Furthermore, we acknowledge from Section 14.10 'Assessments and surveys still to be undertaken' of Chapter 14 that prior to installation further ground conditions surveys are to be conducted. These surveys should also be utilised for a further archaeological assessment, in order to refine mitigation measures based on the most up-to-date and/or highest resolution data. This should be undertaken by a qualified and experienced archaeologist to a method statement approved by the licence regulator and their archaeological curator.</p>	<p>Methodologies and mitigation measures will be detailed in the outline WSI submitted as part of the DCO application and the final WSI agreed and implemented post consent.</p>
13	<p>Marine Archaeology</p>	<p>We note from the archaeological assessment that localised palaeochannels and palaeovalleys were identified within the sub-bottom profiler data, which may contain in situ remains. Additionally, we understand that there are no wrecks with statutory protection within the ASA. The assessment identified a total of 387 anomalies, of which four are considered A1 anomalies with two of these relating to known UKHO wreck records. The two further receptors identified as A1 are described as a large debris field with a large magnetic anomaly, and a large magnetic anomaly with no surface expression.</p>	<p>Acknowledged.</p>
14	<p>Marine Archaeology</p>	<p>We further note that the remaining 383 anomalies identified are A2, there is a total of 104 recorded losses (A3), mostly dating from the post-medieval period onwards, and that there are no known aircraft</p>	<p>Acknowledged.</p>

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		<p>crash sites within the ASA, but there are 21 recorded losses from the NRHE in the ASA, mostly relating to WWII losses. We understand that no new archaeological features or objects were identified within the intertidal walkover survey, however, there are two records from the NRHE and HER for prehistoric findspots that no longer exist at the locations provided.</p>	
15	<p>Marine Archaeology</p>	<p>However, the information provided in regards to the recorded losses in paragraph 14.9.1.4 of Chapter 14 does not appear to tally with that given in the baseline resources section (14.5 'Baseline Environment'). This must be amended or clarified.</p>	<p>These numbers have been checked and verified and detail provided within the PEIR, and to be included in the final ES is considered correct.</p>
16	<p>Marine Archaeology</p>	<p>However, we note that paragraph 14.4.5.5 of Chapter 14 describes the criteria for the assessment of archaeological value of marine assets shown in Table 14.2 as a five point scale, but the table itself only includes 4 points. This should be clarified or amended.</p>	<p>Table 14.2 will be corrected in the final ES submitted to PINS as part of the DCO application.</p>
17	<p>Marine Archaeology</p>	<p>Paragraph 14.6.2.9 of Chapter 14 references that without mitigation impacts on known potential seabed prehistory receptors could result in significant negative effects. However, with mitigation through further investigation this will become a significant major positive effect through its contribution to the knowledge base of seabed prehistory assets. Whilst we acknowledge this, we wish to caveat this statement with the fact that the positive effect will only be secured through the delivery of a strategic programme of archaeological investigation conducted by a qualified and experience archaeologist, with the result disseminated into the public domain. As such, we would wish to see this concept further detailed within the ES and Outline WSI submitted as part of the DCO application.</p>	<p>An outline WSI will be submitted as part of the DCO application for discussion and agreement and where relevant discussed in the final ES.</p>
18	<p>Marine Archaeology</p>	<p>We note that mitigation measures are proposed in Section 14.7 'Proposed Mitigation', which includes AEZs for the 4 A1 anomalies, each of 100m radiuses around the identified extent of the seabed feature. Additionally, paragraph 14.7.1.2 of Chapter 14 references</p>	<p>The monitoring of AEZs will be further discussed within the final ES.</p>

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		monitoring of AEZs to ensure that no disturbances during installation. We are greatly encouraged to see this provision included, and request further explanation with the EIA for this measure.	
19	Marine Archaeology	We understand that for A2 anomalies AEZs are not typically used, but the project tries to microsite them. However, the statement regarding 'the application of appropriate mitigation' of A2 anomalies should micrositing not be possible, should be more explicitly explained in reference to the mitigation strategies set out in 14.7 of Chapter 14.	Further investigations into the A2 anomalies to determine their archaeological value will be undertaken. This will inform what mitigation measures are required. Further discussion on A2 anomalies will be provided in the final ES and any proposed mitigation will be outlined in the outline / final WSI.
20	Marine Archaeology	We do not approve of the impact assessment provided in Table 14.7 'Direct and indirect impacts summary' of Chapter 14 for the use of anchors during construction, operation and decommissioning. Mitigation measures should include the use of AEZs and micrositing so that anchor positions avoid known archaeological assets, and consideration of the use of a PAD in case of a 'strike'.	Table 14.7 will be updated within the final ES to reflect the proposed mitigation measures.
21	Marine Archaeology	We note that no historic seascape characterisation assessment has been conducted within Chapter 14 'Marine Archaeology', and that Appendix 5.2 'Scoping Opinion' specifies that the Scoping Opinion from the Planning Inspectorate specified that it was acceptable for seascapes assessments to be scoped out of the Environmental Impact Assessment.	Acknowledged.

