



AQUIND Limited

AQUIND INTERCONNECTOR

Environmental Statement – Volume 3 – Appendix 16.1 Consultation Responses

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The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations
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APPENDIX 16.1 CONSULTATION RESPONSES

1.1. SCOPING RESPONSES

Table 1 – Scoping Responses

Ref	Summary of Comment Received	How this has been addressed
4.6.7	<p>The Inspectorate notes that intertidal ornithological surveys have been undertaken; however, the Scoping Report contains limited information regarding the survey methodology, including the location of the vantage points. This information should be clearly presented in the Environmental Statement ('ES'). It is recommended the Applicant seek to agree the scope and adequacy of these surveys with relevant consultation bodies.</p>	<p>An overview of the methods used for intertidal ornithological surveys is provided in Chapter 16 (Onshore Ecology) of the ES Volume 1 (document reference 6.1.16) (Section 16.4.4), with full details of survey methods and results in the Wintering Bird Surveys Technical Appendix (Appendix 16.13) of the ES Volume 3 (document reference 6.3.16.13). Consultation with Natural England ('NE') commenced in November 2018 where details of surveys carried out to date were discussed. Effects on intertidal birds have been assessed within the impact assessment.</p>
4.6.8	<p>The Inspectorate notes the summary numbers of protected bird species and species of conservation concern recorded identified on or over the landfall site during the wintering bird surveys. The ES should provide the survey results and</p>	<p>An overview of results of wintering, intertidal and breeding bird surveys is provided in Chapter 16 (Onshore Ecology) (Section 16.5). The impact assessment has detailed relevant ornithological features and assesses significant effects on them.</p>

	clearly identify the species considered in the impact assessment.	
4.6.9	The Inspectorate notes that the list of qualifying features for Chichester and Langstone Harbour Special Protection Area ('SPA') is incomplete. The ES and/or information to inform the Habitats Regulations Assessment ('HRA') report should correctly identify and consider likely significant effects on all qualifying features of a European site where this is being considered.	An overview of features from European sites is provided in the HRA report (document reference 6.8) and also in this assessment. Stage 1 of the HRA Report identifies Likely Significant Effects ('LSE's).
4.6.10	Reference is made to further detail on intertidal ornithology to be included in Chapter 19 (Ecology (with arboriculture)). The ES should avoid duplication but include clear cross-referencing between relevant aspect chapters.	Intertidal ornithology has been fully documented within this assessment. Clear differentiation in scope from that covered in Chapter 11 (Marine Ornithology) of the ES Volume 1 (document reference 6.1.11) has been provided; where cross-referencing is required this has been highlighted in a transparent fashion.
4.14.2	The ES should clearly describe the Zone of Influence ('Zol') for the Proposed Development. Beyond the designated sites and the Environmental Constraints Plan (Figure 4.1), the Scoping Report does not include specific figures to present ecological information. Clear figures must be provided with the ES, including figures detailing crossings of waterbodies (see also comments at points 4.14.6 and 4.14.7 below).	The study areas which broadly reflect Zol's have been documented in the Preliminary Environmental Information Report ('PEIR'), and are reproduced in this assessment.

<p>4.14.3</p>	<p>The Scoping Report contains very limited information on the temporal and spatial extent of the ecological surveys undertaken to date and those proposed. The ES/appendices should detail the methodology, including spatial and temporal extent of all ecological surveys used to inform the impact assessment and describe any limitations to undertaking those surveys. Additionally, there are some potentially contradictory statements made concerning whether surveys are proposed or not, such as those for [REDACTED] along the Onshore Cable Corridor. The Scoping Report also refers to desk study records and potential habitats for a number of species, but proposes to scope out further surveys with no justification. The Inspectorate recommends the Applicant seek to agree the scope of habitat species with relevant consultation bodies, including NE and local authority ecologists, as appropriate.</p>	<p>The PEIR provided an update on surveys undertaken up until its publication. This information has been updated with detail on surveys undertaken since that time and presented below as part of the impact assessment and reports as appendices to the assessment. Consultation with NE commenced in November 2018 with regards the survey programme. Consultation with Local Authorities and other interested parties such as was undertaken during 2019.</p>
<p>4.14.4</p>	<p>It is unclear whether any National Natural Reserves ('NNR')s are to be considered in the ES, as Chapter 19 contains no reference to these sites. NNRs are noted to be included on the Environmental Constraints Map (Figure 4.1). The ES should identify any NNRs within the Zol for the Proposed Development and assess impacts to these sites, where likely significant effects could occur.</p>	<p>As described in the PEIR, no NNRs are within the relevant Zol/Study Areas. The impact assessment details relevant designated sites that are located within the defined study areas.</p>

<p>4.14.5</p>	<p>The Scoping Report refers to habitat potentially suitable for other notable mammal species but does not expand on what these species might comprise. The ES should clearly identify and value the receptors considered in the impact assessment. The ES should assess significant effects on protected and species of conservation concern, including habitats and species</p>	<p>The desk study undertaken to support the impact assessment includes records sought for ‘notable’ mammals such as hedgehog, brown hare’s and common seal that are all Species of Principal Importance under the NERC Act (2006). Where suitable habitat exists within the relevant study area features are considered to have conservation importance the effects of the Proposed Development on them have been assessed.</p>
<p>4.14.6</p>	<p>The Scoping Report contains no reference to potential aquatic receptors, such as freshwater fish species, which could be affected by the Proposed Development.</p> <p>The ES should include an assessment of noise and vibration impacts arising from Horizontal Directional Drilling (‘HDD’) activities on eel and other sensitive ecological receptors (North Purbeck Stream), where significant effects could occur. The Applicant should make effort to agree the approach to the assessment with relevant consultation bodies. The ES should include an assessment of effects on aquatic receptors within the Zol for the Proposed Development, including noise and vibration impacts on sensitive receptors arising from any HDD works proposed, where significant effects could occur. The ecology aspect chapter should also cross-refer to the findings and</p>	<p>Aquatic features including watercourses, freshwater fish and aquatic invertebrates have been surveyed and assessed in this chapter. Survey methods, and the method subject to consultation with relevant bodies. This chapter includes appropriate cross referencing to other technical chapters that have a direct functional link to ecology.</p>

	<p>assessments made in other relevant aspect chapters in this regard, including Water Resources and Flood Risk. Where mitigation is relied upon to avoid or reduce effects on aquatic receptors, such as through the use of trenchless crossings, this should be clearly described and secured as appropriate through the DCO.</p>	
4.14.7	<p>The Inspectorate notes the 15.5.17.3 proposal to use HDD construction techniques at five locations, including “King’s Pond Site of Special Scientific Interest (‘SSSI’)”. The Inspectorate notes that there is no other reference to a Kings Pond SSSI in the Scoping Report. Chapter 19 identifies a Kings Pond Meadow Site of Importance to Nature Conservation (‘SINC’). No reference to HDD construction techniques is included in the Ecology (with Arboriculture) aspect chapter of the Scoping Report. The ES should clarify the locations where HDD is to take place. Where impact pathways from the Proposed Development to sensitive ecological receptors exist and where a likely significant effect may occur, this should be assessed in the ES.</p>	<p>The Applicant notes that neither Kings Pond nor the land to its immediate south (Denmead Meadows) are currently designated as a SSSI, but Kings Pond is designated as a SINC. Consultation regarding this site with NE has been undertaken to inform design of the Proposed Development to avoid and reduce effects of HDD where possible, the identification of impacts and the assessment of their effects, and development of mitigation proposals for residual effects. The applicant has undertaken a suite of botanical surveys to assess the value of Denmead Meadows and Kings Pond. This process and its results are detailed in the impact assessment Chapter 16 (Onshore Ecology).</p>
4.14.8	<p>It is unclear whether the Applicant will rely solely on NE’s Ancient Woodland Inventory to identify ancient woodland affected by the Proposed Development. Ancient woodlands smaller than 2 hectares (ha) are unlikely to appear on these</p>	<p>Woodland is present within the Order Limits, but comprises areas planted as part of green space within residential development (e.g. along roadsides), self-seeded woodland along railway line</p>

	<p>inventories. The ES should assess likely significant effects on all relevant ancient woodland receptors. The assessment should be supported by survey information. As an irreplaceable resource, the design for the Proposed Development should seek to avoid direct impacts on ancient woodland and veteran trees and ensure that there is no increase in fragmentation of these habitats. The ES should also explain the extent to which enhancement measures, where practicable, to enhance ecological networks and connectivity have been considered.</p>	<p>sides. It has been surveyed and results are detailed in Appendix 16.3 (Arboriculture Report). Both types are semi-natural, subject to management, and not ancient in character. Habitats present within the Order Limits are detailed in Appendix 16.2 (PEA/Phase 1 Report) of the ES Volume 3 (document reference 6.3.16.2). There are however three designated Ancient Woodland areas within the north of study area as defined in Appendix 16.3 (Arboriculture Report) (Crabdens Copse, Crabdens Row and Stoneacre Copse). Appropriate botanical surveys have been carried out along the proposed route to inform the impact assessment.</p>
<p>4.14.9</p>	<p>The ES (and HRA report) should consider potential impacts upon recreational use of green spaces and whether this would have any likely significant effect upon designated sites through temporary displacement of recreation (including onto Solent Waders and Brent Goose Strategy ('SWBGS') sites).</p>	<p>The potential impacts on SWBGS sites has been assessed appropriately in this chapter and in the HRA. Due to avoidance of works in the winter months adjacent to such sites, effects on SWBGS sites have been avoided.</p>
<p>4.14.10</p>	<p>The Inspectorate notes that proposal to programme proposed works within SWBGS sites during the summer months. Any mitigation and/ or design measures relied upon to exclude likely significant effects on designated sites should be explained in the ES and appropriately secured. The Applicant's attention is also directed to the comments of NE</p>	<p>This intention was set out in the PEIR and is reiterated within Chapter 16 (Onshore Ecology) (Section 16.5.6.3). Consultation on this subject was initiated with NE in November. The Applicant has also noted NE's comments included in Appendix 2 of the Scoping Opinion.</p>

	at Appendix 2 to this Opinion with regards to guidance on mitigation and offsetting requirements in respect to effects on SWBGS	
4.14.11	The Applicant should have regard to the Eastney Beach Habitat Restoration Management Plan Supplementary Planning Document in compiling the ES and when considering any biodiversity enhancement measures.	This document has been taken into account by the assessment.
4.14.12	It is noted that there are three route options through this LNR. NE (see Appendix 2 to this Opinion) have identified that this is the only site in Hampshire where there are records of large thorn moth. The ES should consider impacts on invertebrates and potential further survey work/data collection, as appropriate. The Applicant should seek to agree the scope of the data collection with relevant consultation bodies.	The large thorn moth, while scarce in the county (and given status of Nationally Scarce B) is more widespread than just Milton Common – see http://www.hantsmoths.org.uk/species/1911.php . After analysis of evidence from desk study work, invertebrates have been scoped out of the assessment.
4.14.13	The ecological impact assessment presented in the ES should be informed by the findings of other aspect assessments (and vice versa), including Air Quality, Noise and Vibration and Water Quality. Full and appropriate cross-referencing between aspect chapters should be included in the ES.	This chapter has included cross referencing with other technical chapters including those listed by the Planning Inspectorate.

1.2. PEIR CONSULTATION

Table 2 – PEIR Consultation

Consultee	Date & Method of Consultation	Discussion	Summary of Outcome of Discussions
NE	Email from NE sent on 13 February 2018, email reply sent by Hing Kin Lee (WSP) on 1 March 2018	Denmead Meadows and Eastney Beach	The meeting summarised surveys that had been undertaken and that were planned, and introduced intentions on behalf of the Proposed Development to use HDD at Denmead Meadows and Eastney Beach to avoid impacts on ecological features at these two locations.
NE	5 November 2018 at NE Office, Eastleigh	Introduction to the Project and route. Change of consenting process. Protected Sites, ecology surveys and constraints.	The following ecological features and subjects were discussed: SINCs – NE confirmed they are not opposed in principle to works being undertaken in SINCs, as long as sensitive areas are avoided and works to improve the condition of site (habitat improvements) are implemented. They expressed interest in further engagement on SINCs affected by the Proposed Development. Denmead Meadows - Due to botanical richness NE expressed a preference for the applicant to consider it is a habitat of conservation interest, and either avoid it altogether or use HDD to pass underneath. They suggested discussion on scope and methods of surveys for 2019 to inform if meadows are worthy of a higher conservation designation. NE confirmed the principle of two sections of HDD to traverse these meadows as an acceptable

Consultee	Date & Method of Consultation	Discussion	Summary of Outcome of Discussions
			<p>solution, and would be NE’s normal request if trenching was proposed, subject to further survey work.</p> <p>Removal of Trees/Hedgerows – Losses of mature trees and hedgerows were discussed at Converter Station footprint. NE stated that loss of trees and hedgerows should be minimised, and it was confirmed that the Proposed Development has tried to minimise losses along rest of route.</p> <p>Grassland – NE expressed that losses around the Converter Station Area would need to be mitigated.</p> <p>Great crested newt – NE advised that a licence may not be necessary, due to temporary and localised nature of works and lack of suitable terrestrial habitat being lost.</p> <p>Brent Goose and wintering birds in Portsmouth – constraint of avoiding Brent Goose strategy sites over winter period discussed, and the possibility of arranging compensatory payment if works are needed.</p> <p>Ancient woodland – avoiding ancient woodland was discussed around the Converter Station Area, including maintaining a minimum 15 m buffer. Further consultations required.</p>

1.3. POST-PEIR CONSULTATION

Table 3 – Post-PEIR Consultation

Consultee	Date & Method of Consultation	Discussion	Summary of Outcome of Discussions
NE	6 February 2019, meeting	Ecological surveys, effects on Denmead Meadows and Eastney Beach SINC	<p>General Project design update given alongside an update on results of ecological surveys to date. Denmead Meadows was highlighted as an important site for survey and mitigation to inform the impact assessment process.</p> <p>Discussion of the landfall site at Eastney Beach SINC confirmed no vegetated shingle would be affected there.</p>
South Downs National Park Authority ('SDNPA')	11 April 2019, letter issued electronically via email	Converter station design and construction	<p>SDNPA highlighted the potential effects of the construction of the Converter Station on terrestrial ecological features. It highlights the following points that SDNPA sought to be addressed through surveys and the impact assessment process:</p> <ul style="list-style-type: none"> - Consideration of invasive non-native species; - Further survey work for reptiles; - That a key objective of the application should be to preserve and increase the connective woodland and hedgerow cover on the site; and - Increase the weight given within the assessment to woodland, hedgerows and species which use them, specifically bats.

Consultee	Date & Method of Consultation	Discussion	Summary of Outcome of Discussions
NE	25 April 2019, meeting with presentation material	Ecological survey results update and discussion of landscaping proposals	Short update call to provide interim survey results and discuss outline proposals for landscaping in areas of permanent development.
NE	17 July 2019, meeting with presentation material	Ecological survey results update, discussion of avoidance and mitigation, and a Statement of Common Ground	<p>Further updates to ecological survey results were provided along with discussion of the potential effects of the proposed Onshore Cable Corridor options.</p> <p>Limiting effects on Denmead Meadows was highlighted as a key requirement for NE, and HDD entry and exit points were discussed in addition to the proposed location for the construction compound. Mitigation proposals for this site were requested by NE. Effects on Milton Common SINC were also discussed, along with the requirement for a cumulative effects chapter.</p> <p>An update on the HRA process was given.</p>
Winchester County Council ('WCC')	13 August 2019, meeting with presentation material	Ecological mitigation and habitat connectivity around the proposed	Summary of ecological surveys undertaken since PEIR submission. Identified the need to maintain connectivity of habitats across the proposed Converter Station site, replacing hedgerow loss with other landscape features to prevent fragmentation. Discussed ecological importance of Denmead Meadows within region and requirement for this to be considered appropriately in the ES.

Consultee	Date & Method of Consultation	Discussion	Summary of Outcome of Discussions
		Converter Station	
NE	28 August 2019, conference call	Proposed Development design along Hambledon Road and at Denmead Meadows	The call involved discussion of how the Proposed Development could be designed to avoid effects on HPI Lowland Meadow habitat at Denmead Meadows (Section 3). WSP provided an explanation as to why the HDD compound could not be located south of Hambledon Road (due to interactions with chalk bedrock), laid out mitigation proposals to restore Lowland Meadow habitat, and also a plan of botanical monitoring for the site, and responded to NE questions related to these subjects. These proposals have been incorporated into mitigation measures incorporated into the ES.
Langstone Harbour	24 October 2019, email via Natural Power.	Comments from Langstone Harbour regarding intertidal birds sent to Natural Power.	<p>Langstone Harbour comment 1: While construction is taking place close to or adjacent to the harbour shoreline, working practices should be put into place to minimise noise during the overwintering bird season (October to March). Natural England should be able to provide advice on construction noise minimisation to limit disturbance to SPA birds.</p> <p>WSP Ecology response: An assessment of noise effects on intertidal birds has been provided in Chapter 16 (Onshore Ecology) (Section 16.6.2) and has included consideration on how to avoid noise effects from the construction of the Proposed Development.</p> <p>Langstone Harbour comment 2: The route will potentially cross numerous fields and open spaces utilised by Brent Geese and Waders during the</p>

Consultee	Date & Method of Consultation	Discussion	Summary of Outcome of Discussions
			<p>winter months. These areas are considered secondary supporting habitat for SPA species, and further details can be found in the Solent Wader and Brent Goose Strategy. Every effort should be made to avoid rendering these spaces unusable to birds during the overwintering bird season (October to March).</p> <p>WSP Ecology response: Seasonal restrictions to construction works have been adopted to minimise disturbance to wintering birds particularly at Solent Wader and Brent Goose Strategy (SWBGS) sites that lies within the Proposed Developments Order Limits, as detailed in Appendix 16.14 (Winter Working Restriction).</p> <p>Langstone Harbour comment 3: The routes pass through (or under) seagrass beds in the harbour, as well as areas of saltmarsh. Seagrass is particularly sensitive to smothering by silt stirred up in the water column and this should be considered, and if necessary mitigation measures put into place, if any aspect of construction is likely to agitate the substrate.</p> <p>WSP Ecology response: Intertidal habitats are avoided through Horizontal Directional Drilling (HDD), as discussed within Chapter 16 (Onshore Ecology) (Section 16.3.5).</p>

