



AQUIND Limited

AQUIND INTERCONNECTOR

Environmental Statement – Volume 3 – Appendix 18.2 Consultation Responses

The Planning Act 2008

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

The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

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APPENDIX 18.2 CONSULTATION RESPONSES

1.1. SCOPING OPINION RESPONSES

Table 1 - Scoping Opinion Responses

Scoping Opinion Ref	Summary of Comment Received	How this has been addressed by the Applicant
<p>East Hampshire District Council ('EHDC') Ground conditions/contamination page 13</p> <p>Winchester City Council ('WCC') Ground conditions/contamination page 26</p> <p>Havant Borough Council ('HBC') Ground conditions/contamination page 5</p> <p>Portsmouth City Council ('PCC') Water resources and flood risk/ground conditions page 8</p>	<p>Environment Surveys and inspection must include consideration of soils, potential contamination, geology, superficial cover, bedrock, hydrogeology, solution features, source protection zones and nearby abstractions.</p>	<p>At the time of preparing their scoping opinion, the Local Planning Authorities ('LPAs') had not had sight of the baseline study and preliminary risk assessment ('PRA') that supports this ES. In particular, PCC has requested sight of this baseline information in advance of commenting further. The findings of the baseline study and PRA are included within Chapter 18 (Ground Conditions) of the Environmental Statement ('ES') Volume 1 (document reference 6.1.18), with further detail provided in Appendix 18.1 (PRA and GQRA) of the ES Volume 3 (document reference 6.3.18.1).</p>
<p>EHDC Ground conditions/contamination page 13</p>	<p>The proposed cable route has solution features present. These</p>	<p>LPAs have stated that the assessment of contamination must include an</p>

<p>WCC Ground conditions/contamination page 26</p> <p>HBC Ground conditions/contamination page 5</p> <p>PCC Water resources and flood risk/ground conditions page 8</p>	<p>features contribute to karstic environment with rapid transit times therefore pollution prevention is key. Consideration of the solution features must form part of the scope of work particularly in key area i.e. close to the Lambeth Group and Chalk Boundaries and clay with flints and chalk boundaries.</p>	<p>assessment of solution features and karst rock conditions and how this may affect pollution transit times. An initial assessment of the risk to Chalk aquifer resources and the influence karstic condition have on sensitivity is included in both Chapter 18 (Ground Conditions) and Chapter 19 (Groundwater) of the ES Volume 1 (document reference 6.1.19). Discussions were had with relevant regulators and stakeholders in order to agree a way forward. More detailed assessment of the associated risks have been covered in this ES.</p>
<p>EHDC Ground conditions/contamination page 13</p> <p>WCC Ground conditions/contamination page 26</p> <p>HBC Ground conditions/contamination page 5</p> <p>PCC Water resources and flood risk/ground conditions page 8</p>	<p>Sites of geological interest should include solution features</p>	<p>LPAs have requested that sites of geological interest should include solution features. Sites of geological interest are included in the ES. Solution features are discussed in detail within Chapter 19 (Groundwater).</p>
<p>EHDC Ground conditions/contamination page 13</p>	<p>Where Secondary A Aquifers overlie Principal Aquifers, this should have a receptor</p>	<p>The Sensitivity Receptor table has been updated in the ES to include receptor assessment where Secondary A Aquifers</p>

<p>WCC Ground conditions/contamination page 26</p> <p>HBC Ground conditions/contamination page 5</p> <p>PCC Water resources and flood risk/ground conditions page 8</p>	<p>assessment of High due to the potential connectivity of the aquifer and the presence of solution features Secondary A and B aquifers should lie in Moderate Risk and it is recommended that Unproductive Strata is present in Low Risk.</p>	<p>over Principal Aquifers with a classification of High.</p>
<p>EHDC Ground conditions/contamination page 13</p> <p>WCC Ground conditions/contamination page 26</p> <p>HBC Ground conditions/contamination page 5</p> <p>PCC Water resources and flood risk/ground conditions page 8</p>	<p>All imported soils material must be clean and inert and not pose a contaminant threat to underlying aquifers.</p>	<p>This issue has been dealt with in Chapter 27 (Waste and Material Resources) of the ES Volume 1 (document reference 6.1.27). However, we would never advocate, nor would legislation permit, the importation of contaminated soils to the site</p>
<p>EHDC Ground conditions/contamination page 13</p> <p>WCC Ground conditions/contamination page 26</p> <p>HBC Ground conditions/contamination page 5</p>	<p>The assessment must be designed to understand the potential for pathway creation through impacted soils /or long-term spill and incident management if preferential pathways are created</p>	<p>Both Chapter 18 (Ground Conditions), Chapter 19 (Groundwater) and Chapter 20 (Surface Water Resources and Flood Risk) of the ES Volume 1 (document reference 6.1.20) include a preliminary assessment of the potential for the creation of preferential pathways to sensitive receptors (human health/soils</p>

<p>PCC Water resources and flood risk/ground conditions page 8</p>		<p>and groundwater resources, respectively).</p>
<p>EHDC Ground conditions/contamination page 13 WCC Ground conditions/contamination page 26 HBC Ground conditions/contamination page 5 PCC Water resources and flood risk/ground conditions page 8</p>	<p>The Conceptual Site Model ('CSM') should also look at the development phase as well as legacy contamination and how mitigation measures can be deployed to prevent pollution occurring during the pre-development and operational stages.</p>	<p>The CSM within Appendix 18.1 (PRA and GQRA) addresses potential contamination risk during both the construction and operational stages of the Proposed Development as well as legacy contamination. This has been incorporated into the ES.</p>
<p>Water Resources and Flood Risk/Ground Contamination page 8</p>	<p>A review of PCC in house records.</p>	<p>A visit to PCC to review in house records was completed on 12 June 2019.</p>

1.2. INFORMAL CONSULTATION PRIOR TO PEIR RESPONSES

Table 2 - Informal consultation prior to PEIR Responses

Consultee	Date (Method of Consultation)	Discussion	Summary of Outcome of Discussions
Environment Agency ('EA')	29 September 2017 (email)	The EA were not aware of any ground storage tanks or gas meter, and suggested further enquires were made with the local authority. The EA identified six waste management facilities within 500 m of the Onshore Cable Corridor.	Data was incorporated into the baseline study, the assessment of impacts and the constraints drawings of the PEIR and subsequently the ES.
WCC	10 November 2017 (email)	WCC required a plan showing the extend of the site before any responses could be made.	Contact has been made with WCC and responses have been incorporated into the ES.
PCC	02 May 2018 (email) 09 May 2018 17 May 2018	The PRA would need to be seen in order to consider if any works, takes place as the CSM drives locations and depths to sample. The draft PRA would be of use, but given the information sources used didn't include the local records, it will probably only be indicative. The PCC Contaminated Land Office ('CLO') anticipated that either a reduced scope for the local records or maybe someone coming into the office and trace the cable run on GIS and decide what reports are of interest would be one way to proceed. The PCC CLO mentioned that they will be checking their	A visit to PCC to review in house records was carried out on 12 June 2019. Information has been included in Appendix 18.1 (PRA and GQRA) and subsequently Chapter 18 (Ground Conditions).

records for the proposed boreholes however this work has/may be already completed by the Pollution team. They requested that this information be submitted. Rather than trying to find 'clean' locations for boreholes, their requirement was that the boreholes testing for pollution are located in the locations most likely to be polluted with some extra for 'coverage'. The Method Statements for the boreholes should detail assessment and waste disposal, and also how the boreholes will not create new pathways or compromise remediation (if present in each area).

The PCC CLO requires a Method Statement for each of the sample locations for the Ground Investigation ('GI'). The land use summaries produced for the locations so far show historical records but nothing that would stop the process. For many of these locations the PRA indicates landfill but we also have reports showing greater information and the British Geological Survey ('BGS') borehole logs should also be looked at. BS10175 desk study and a rational for the sample locations will need to be submitted after the desk study has been created and existing reports checked.

1.3. PEIR CONSULTATION

Table 3 - PEIR Consultation

Consultee	Summary of Comment Received	How this has been addressed by the Applicant
WCC	<p>There is an expectation that the footprint of the convertor station could be set at a lower level and there is nothing in the soils or groundwater chapters to show why this is not feasible.</p>	<p>From a land quality perspective, there is no reason why the convertor station could not be set at a lower level with the resultant excavated material then used as part of the landscaping scheme. This is predominately a groundwater protection issue which has been addressed in Chapter 19 (Groundwater).</p>
EA	<p>The EA need to see to see more detail regarding pollution prevention measures during construction and operation in order to provide assurance that there will be sufficiently robust protection of groundwater.</p> <p>Further consideration is required of the impacts of the development in relation to groundwater, considering Karst (solution) features and locations within Source Protection Zone 1.</p> <p>As well as the Bedhampton and Havant Springs Source Protection Zone 1, parts of the site proposed route, as well as the converter station, are also within the Source Protection Zone 1 for and public water supply and Lovedean. It is not clear that this is recognised in all sections of the reports.</p>	<p>Details on pollution prevention measures during the construction and operation stages are presented in the Proposed Mitigation and Enhancement Section (Section 18.8) of Chapter 18 (Ground Conditions).</p> <p>The Ground Conditions and Water Resources Teams have liaised and assessed the risks to groundwater via karst conditions known to be present in section 1-5. The outcome of this has been presented in the ES.</p> <p>As part of Chapter 18 (Ground Conditions) the importance of the public water supply at Lovedean has been recognised.</p> <p>A meeting with the EA has been arranged, all information gained from the meeting relevant to ground conditions and groundwater has been summarised and assessed as part of the ES.</p>

	<p>A number of specific comments on the Ground Conditions Chapter have been made relating to landfills, karst conditions and ground investigations.</p>	
<p>PCC</p>	<p>There are areas of significant site contamination along the identified route options and areas that have been previously remediated. Until the applicant assesses available records and creates a conceptual model with knowledge about what is known about the ground conditions it remains problematical to comment further.</p> <p>The initial survey is only indicative and there will be additional phase of works to consider ground pollution. The sampling to assess pollution along the length of the cable route and assess risks before starting any works should target areas of pollution and be based on a Conceptual Model of the risks created.</p>	<p>A visit to PCC to review house records was completed on 12 June 2019, subsequently information has been incorporated into the ES. A CSM for each section of the route has been created and is located within Appendix 18.1 (PRA and GQRA).</p> <p>It is not intended to carry out a further stage of ground investigation for contamination assessment ahead of the publication of the ES. However the ES will inform the design development, including the need for additional ground investigation.</p>

1.4. POST-PEIR CONSULTATION

Table 4 - Post-PEIR Consultation

Consultee	Date (Method of Consultation)	Discussion	Summary of Outcome of Discussions
PCC	12 June 2019 (Meeting)	Purpose of the meeting was to obtain historical records relating to contaminated land (landfills, former industrial land uses and areas that have been remediated). The cable route was traced out on the GIS system and reports of interest either on the route (Section 7 – Milton Common), or surrounding the route were selected to be reviewed at a later date.	The reports selected were reviewed and incorporated into the Baseline Environment Section (18.5) of Chapter 18 (Ground Conditions) and the information was used to create conceptual site models for each section of the report which are located within Appendix 18.1 (PRA and GQRA).

