



AQUIND Limited

AQUIND INTERCONNECTOR

Environmental Statement – Volume 3 – Appendix 21.1 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 21.1 CONSULTATION RESPONSES

1.1. SCOPING RESPONSES

Table 1 – Scoping Responses

Scoping Opinion Ref.	Summary of Comment Received	How this has been addressed by the Applicant
PINS 4.18.1	The Inspectorate agrees that given the nature of the Proposed Development that impacts on the settings of above ground Designated Heritage Assets along the cable corridor can be scoped out of the ES.	n/a
PINS 4.18.1	Due to the proximity of the landfall to the scheduled ancient monument of Fort Cumberland and listed buildings, together with the limited information provided within the Scoping Report with regards to the nature of the works at the landfall site, the Inspectorate does not agree to scope out impacts on the setting of above ground heritage assets at the landfall. The ES should include an assessment of any significant effects on	The Environmental Statement ('ES') assessment has included an assessment of setting related impacts at the Landfall site for the Operational Stage, due to the proximity of Fort Cumberland to the proposed Optical Regeneration Station(s) ('ORS'). The predicted short-term effects on the setting of these assets during the Construction Stage (e.g. dust and noise) is considered negligible and the

	heritage receptors that are likely to occur.	<p>environmental effect insignificant. The Onshore Cable Corridor would entail localised disturbance, with no physical impacts within or near the scheduled monument constraint area.</p> <p>In terms of Operational Stage impacts, the Inspectorate has agreed that impacts during operation on the settings of above ground Designated Heritage Assets at the landfall and throughout the cable corridor can be scoped out of the ES (ID 4.18.3).</p>
PINS 4.18.2	The Inspectorate agrees that given the nature of the Proposed Development impacts to buried archaeological remains during operation can be scoped out of the ES.	n/a
PINS 14.8.3	The Inspectorate agrees that given the nature of the Proposed Development, impacts during operation on the settings of above ground Designated Heritage Assets at the landfall and throughout the cable route can be scoped out of the ES	n/a
PINS 14.8.4	The Scoping Report does not make clear whether the Applicant intends to	Cumulative effects for above-ground heritage assets at the proposed

	<p>scope out an assessment of any cumulative impact to heritage and archaeological assets along the cable route and landfall and this matter is not included in Table C1 of Appendix C.</p>	<p>Converter Station and the Landfall have been assessed within the ES.</p>
<p>PINS 4.18.5</p>	<p>It is noted that a ZTV is proposed for the assessment of impacts on above ground settings arising from the Converter Station and that this has not yet been established for the Proposed Development. The impact assessment should ensure that the determination of baseline receptors is appropriately informed by the ZTV, and the study area/ZoI clearly justified. The study area for the assessment of the entire Proposed Development should also be based on the likely ZoI rather than an arbitrary distance.</p>	<p>The rationale for the study area for the setting assessment within the area of the proposed Converter Station Option B (i) location has been determined by the use of a Zone of Visibility ('ZTV') in the Preliminary Environmental Information Report ('PEIR').</p>
<p>PINS 4.18.6</p>	<p>The Inspectorate notes the intention to undertake a site walkover inspection at selected locations to inform the ES. The Inspectorate considers that the proposed baseline assessment at the landfall should be informed by a geophysical and geotechnical survey undertaken in accordance with</p>	<p>The ES assessment stage has included an extensive magnetometry survey with the scope and rationale for site selection approved by the relevant Local Planning Authorities ('LPAs').</p> <p>A Geophysical Survey is not considered appropriate at Landfall site as the area</p>

	<p>recognised methods. The Applicant should seek to agree the scope and extent of such surveys with the relevant consultation body, including Hampshire County Archaeology/Conservation Officers.</p>	<p>of impact for the Joint Bay ('JB') would be located within an existing car park in an area of hardstanding.</p>
<p>PINS 4.18.7</p>	<p>It is noted that reference is made to obtaining desk-based information from the principal source of Berkshire Historic Environmental Record (HER); however, the Inspectorate assumes this is a typographical error and that the Hampshire HER will be consulted to inform the ES.</p>	<p>This has been corrected in the PEIR/ES.</p>
<p>PINS 4.18.8</p>	<p>The Inspectorate considers that the ES should address impacts to drainage and groundwater movement where these may result in significant impacts to heritage assets and below-ground archaeological remains. Cross reference should be made to the relevant assessments (e.g. Ground Conditions and Water Resources and Flood Risk chapters).</p>	<p>Cross reference will be made to other reports where appropriate. Alterations to drainage and ground water are not however considered significant, taking into account the nature of the details of the Proposed Development, which is a 1.0–1.5 m cable trench with localised disturbance for temporary JB's.</p>

<p>EHDC (HCC Archaeologist) – Letter dated 25 April 2018</p>	<p>Potential impacts on non-designated heritage assets should be assessed;</p>	<p>An assessment of potential construction impacts on non-designated assets has been carried out.</p> <p>Operational Stage impacts to the setting of Non-Designated Above-Ground Heritage Assets which are not of high or very high significance has been scoped out. In line with proportionality set out in the overarching National Policy Statement for Energy (EN-1) such assets are not considered significant enough to warrant a settings assessment.</p>
	<p>Assessment should demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected have been properly assessed;</p>	<p>The rationale for the study area for the Historic Environment assessment is considered appropriate to define the baseline conditions. The rationale for the settings assessment study area at the indicative Converter Station location has been determined by the use of a ZTV in the PEIR and ES.</p>
	<p>Needs to be an understanding of what makes the Designated Heritage Assets special and how the proposal would impact on significance;</p>	<p>This has been included in the ES.</p>

	Assessment should take account of potential impact of development activities.	All aspects of the Proposed Development have been assessed in the PEIR and ES Chapter.
WCC – Letter dated 4 May 2018 (re-submitted scoping opinion)	The EIA assessment stage should include further site surveys (such as geophysical survey) and site investigations (trial trenching) for those areas of the cable route which lie outside the existing road network and for the proposed site of the sub-station.	See responses as above. Extensive site-based archaeological geophysical survey has been carried out across the rural areas of the Order Limits with the scope and rationale approved by the LPA archaeological advisors. Stage 2 Trial Trenching is proposed in areas outside the existing road network following submission of the ES.
Hampshire Borough Council Letter dated 25 April 2018 (re-submitted scoping opinion)	Comments all included above.	Responses as above.
Portsmouth City Council June 2018 (re-submitted joint scoping opinion)	Particular concern for Fort Cumberland or areas in close proximity to the Fort.	The Proposed Development would entail no physical impacts within or near the scheduled monument constraint area. The Onshore Cable Corridor would be buried with no setting impacts. Setting related impacts have been assessed at Landfall within the ES.

	An appropriate level of engagement with the Hampshire County Archaeologist and Conservation Officer is encouraged;	Further consultation has been carried out after the PEIR was made available and during the ES assessment stage.
	Ensure that the DBA sets out the nature of the archaeological potential, impact on this potential and a mitigation strategy as anticipated in the scoping report;	Appendix 21.2 (HEDBA) of the ES Volume 3 (document reference 6.3.21.2) sets out the general archaeological potential with a detailed baseline assessment contained within Chapter 21 (Heritage and Archaeology) of the ES Volume 1 (document reference 6.1.21). The likely resulting impact and the proposed mitigation strategy have been set out.

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
Historic England (Elizabeth Rhodes)	March - April 2019 (email correspondence)	The nature of the proposals within the vicinity of Fort Cumberland	It was demonstrated that no disturbance would occur within the Scheduled Monument Constraint Area. Historic England ('HE') highlighted the potential for late 19th century rifle range structures within the vicinity, as seen on late 19th century Ordnance Survey Mapping and the

		Scheduled Monument were discussed	potential for other below-ground remains relating to the fort. Raised concern as to whether there would be any noise and vibrations created as a result of cables being inserted.
WCC (Tracy Matthews)	27 February 2019 (email)	Geophysical Survey Scoping rationale	<p>Email correspondence copied below:</p> <p><i>“I’ve reviewed the proposed geophysical survey area plans and the AB/HDD scoping report and agree with your proposals.</i></p> <p><i>Most of the greenfield areas lie in Winchester district and you are proposing to undertake GS over these areas as previously discussed, so this is fine. Just one query, when you say First Stage GS (blanket magnetometry), are you proposed detailed survey or just scanning?</i></p> <p><i>Regarding the JB areas, JBs 45 and 46 also lie in Winchester district and not within Havant.</i></p> <p><i>Re the exclusion of JBs 38 & 44 from the proposed GS, I agree that these can be excluded (JB38 - as this has been subject to previous GS and evaluation trenching in connection with the Waterlooville MDA and no further archaeological mitigation work has been required in this area. JB 44 is excluded as it is currently a car park/unsuitable for survey; this area could be looked at during a later stage of this iterative programme of evaluation work.</i></p>

			<p><i>I look forward to receiving a WSI for the GS in due course.</i></p> <p><i>Has the archaeological monitoring of geotechnical SI works which we corresponded on in April last year been completed yet? I assume that this report will be made available in due course, to consider together with the GS results?</i></p> <p><i>Geophysical Scope/Methodology was endorsed and the queries were addressed.”</i></p>
	01 May 2019 (email)	Written Scheme of Investigation ('WSI') for Geophysical Survey sent for approval	WSI approved.
Hampshire Borough Council (David Hopkins)	21 February 2019 (email)	Geophysical Survey Scoping Rationale (Joint Bay Scoping)	<p>Para 1.1.1.3 recommends a staged approach and this was endorsed. Para 1.1.1.4 recommends that the first phase of that staged approach should be a non-intrusive geophysical survey. Also endorsed (whilst also noting that the first stage might also include an archaeological presence during preliminary Ground Investigation ('GI') interventions). It was noted that the geophysics results might inform subsequent trial trench locations (para 2.3.1.1) but also pointed out that whilst it might influence the location of trial trenches the location of the trial trenches should not be based solely on the geophysical</p>

			<p>results as some of the archaeological remains for which the route has potential are not susceptible to discovery in this way.</p> <p>Para 2.4.1.7 offers a decision table to select the areas suitable for geophysical survey. This was endorsed.</p>
	30 April 2019	WSI for Geophysical Survey sent for approval	WSI approved

1.3. PEIR CONSULTATION

Table 3 – PEIR Consultation

Consultee	Summary of Comment Received	How this has been addressed by the Applicant
Historic England	<p>Page 1: We are concerned however that Conservation Areas have not been included in any of the heritage documentation. A number of the Listed buildings identified lie within Conservation Areas along the proposed route (for example Milton Lock in route Section 9, and St Johns Church in route Section 4), but the CAs have not been identified as Designated Heritage Assets, and the impacts on them have also not therefore been assessed.</p>	<p>There are no conservation areas within the vicinity of the Proposed Converter Station.</p> <p>The assessment of setting related impacts along the proposed cable corridor has been scoped out of the PEIR and ES on the basis that the cable corridor is entirely below ground and the possible impact on the setting of Designated Heritage</p>

	<p>Unsympathetic construction works and the placing of new infrastructure such as joint bays and link pillars/cabinets/boxes (described in section 3.2.2 of the Consultation Document) have the potential to negatively impact the special character of CAs, and these aspects will need to be carefully considered during all phases of the project.</p> <p>There may also be greater impacts during construction phases in terms of how the CAs can be appreciated and enjoyed (noise, dust, road closures etc.), and we would expect all these impacts to be included and assessed appropriately in the supporting documentation.</p>	<p>Assets from temporary works during installation is insignificant.</p> <p>Whilst the exact location and dimensions of any associated above ground link boxes (pillars) or cabinets is yet to be determined, it is anticipated that 5-6 link boxes/cabinets will be required along the whole route and that these will be very small structures (0.8m x 0.8 m x 0.6 m) that can be either below or above ground. As such, they would not introduce substantial built form within the existing landscape and the potential impact of these is considered an insignificant effect, i.e. not enough to require setting impacts along the proposed cable corridor to be scoped in.</p>
	<p>Page 2: Langstone Harbour</p> <p>We understand from Chapter 3 that route Section 7 of the onshore cable route is planned to run beneath Langstone Harbour and that HDD will be utilised for this section of cable to eliminate the impact to the intertidal and subtidal seabed. We note that the entry and exit pits will be located above Mean High Water Springs (MHWS) and therefore do not constitute marine works. We have no objection to this approach.</p> <p>Furthermore, we understand that the HDD projection will be conducted below archaeological deposits within</p>	<p>Pre-determination geotechnical boreholes along the proposed cable corridor in the area of Langstone Harbour is not considered warranted or appropriate given the nature of the proposed impact.</p> <p>Whilst the archaeological and geoarchaeological potential of this area is not well understood, the proposed Horizontal Directional Drilling ('HDD') cable routing will be bored at depth within solid geology (Chalk), well beneath any alluvium and any deposits of archaeological and</p>

	<p>Langstone Harbour, but that within paragraph 20.6.8.4 of Chapter 20 ‘Heritage and Archaeology’ the current understanding of archaeological deposits within this area is poorly understood.</p> <p>We advise that it is therefore crucial that this potential is explored through a strategic programme of geotechnical investigations conducted along the cable route, inclusive of coring, which is assessed by a qualified and experienced geoarchaeologist. This is to ensure that up-to-date information regarding archaeological deposits is used within the engineering design prior to the installation, to ensure that appropriate mitigation measures are developed. The use of OSL dating should be considered from non-organic deposits, or those of a greater age than be dated using radiocarbon. As such, it would be useful for method statements for these assessments to be approved by the appropriate archaeological curator, however we would be pleased to provide.</p> <p>In this regard, we also note that palaeoenvironmental sampling and investigation are detailed within paragraphs 20.9.1.17 to 20.9.1.19, however further detail should be included.</p>	<p>geoarchaeological interest. Such deposits would not be affected.</p> <p>The only impact on potential paleoenvironmental deposits would be at the HDD joint bay locations. At Langstone Harbour the HDD entry point would be positioned at a car park at Kendall’s Wharf with the HDD bores crossing the Broom Channel to an exit pit in a playing field north of the A27. Modern made ground has been identified in geotechnical investigations at the entry point up to a depth of 4.7m.</p> <p>Consequently, there would be limited impact on any archaeological/geoarchaeological deposits. At the exit point topsoil overlies a thin band of 0.3m thick alluvium; any potential impact to these alluvial deposits at the exit point could be mitigated through trial trenching or a watching brief during construction.</p> <p>Further detail on proposed palaeoenvironmental sampling and investigation would be provided in future WSI produced following submission of the ES.</p>
	<p>Page 3: Optical Regeneration Station at Landfall</p> <p>We are concerned therefore that setting impact to Designated Heritage Assets has been scoped out. Dependant on the location of the ORS’s there may be a</p>	<p>The ORS may be a new or existing structure of approximately 11 m x 11 m x 4 m high.</p> <p>The proposed ORS building has been assessed in terms of potential setting related impacts to</p>

	<p>setting impact to be considered in relation to Fort Cumberland (scheduled monument and Grade II* listed building). It is our advice therefore that setting is considered, scoped in, and included in the documentation.</p>	<p>Fort Cumberland Scheduled Monument and Listed buildings (included in this ES). No other assets have been scoped in based on the proposed location, massing and height of the buildings.</p>
	<p>Page 3: Landfall – Fort Cumberland</p> <p>Section 20.8.1.19 notes that at the proposed Landfall, anticipated to be located within the car park south of Fort Cumberland Road, 2 TJBs will be required; one per pair of HVDC cables each entailing the excavation of approximately 15 m x 5 m, to a depth of up to 1.75 mbgl. This section also notes that there would be no construction impacts within the scheduled monument consent area adjacent to the Landfall, and therefore there would be no effects on post-medieval remains. We do not agree with this statement; it must be considered that there could be potential for the discovery of medieval and modern remains outside the scheduled area that directly relate to the construction, use and function of Fort Cumberland or its predecessor.</p>	<p>The potential impact upon known or possible archaeological remains of all periods has been fully assessed in the ES Chapter, including potential post-medieval remains lying outside of the scheduled monument consent area, which might relate to the construction, use and function of Fort Cumberland or the adjacent 19th century rifle range.</p>
PCC	<p>6.6: A full archaeological survey along the final cable route through the city should be provided.</p>	<p>The archaeological impact of the full extent of the cable corridor, including the stretch through Portsmouth City, has been assessed in the ES.</p>
HCC	<p>Page 20, Section 9: The area of relative high ground immediately to the east of St James’ hospital, to the south</p>	<p>The impact of the proposed cable corridor in this area has been assessed in the ES.</p>

	<p>of Milton Common, is believed to have been occupied in the prehistoric era, while a flint scatter has been recorded close to the hospital buildings (PCCHER no: MPM1192). Any construction along this section, particularly on the school site close to the hospital, may well expose prehistoric archaeological features and/or stray finds.</p>	<p>The area is currently in use as playing fields but is essentially a greenfield site and would therefore be suitable for preliminary geophysical survey. This would ideally be carried out once the line of the proposed cable corridor has been determined (although this has to date been assumed to follow the of the existing road where geophysical survey would not be appropriate), along with the location of any temporary compounds and access within the playing fields, where topsoil would be removed.</p> <p>It should be noted that artefact-rich sites such as prehistoric flint scatters would not be picked up by geophysical survey, and intrusive survey methods such as targeted trial trenches would be required. Therefore, Trial Trenching considered appropriate for this area.</p>
	<p>The cable route crosses the line of the former Portsmouth Canal (PCCHER no: MPM1347). Excavations may expose the infilled remains of the canal basin which has yet to be properly recorded. However, it is doubtful that the construction methodology employed would expose enough of the feature for interpretable sections to be recorded.</p>	<p>Although the likelihood for remains is considered low; the construction impacts to the area with the potential for surviving canal remains is identified in the ES; and the appropriate mitigation recommended.</p>
<p>Winchester District Council</p>	<p>I offer the following comment which draws heavily on the view of the Archaeological Officer:</p>	<p>Formal response to the queries has previously been provided to the Archaeological officer (28-02-19). Response copied below:</p>

<p>-Most of the greenfield areas lie in Winchester district and you are proposing to undertake GS over these areas as previously discussed, so this is fine. Just one query, when you say First Stage GS (blanket magnetometry), are you proposed detailed survey or just scanning?</p> <p>Regarding the JB areas, JBs 45 and 46 also lie in Winchester district and not within Havant.</p> <p>Re the exclusion of JBs 38 & 44 from the proposed GS, I agree that these can be excluded (JB38 - as this has been subject to previous GS and evaluation trenching in connection with the Waterlooville MDA and no further archaeological mitigation work has been required in this area. JB 44 is excluded as it is currently a car park/unsuitable for survey; this area could be looked at during a later stage of this iterative programme of evaluation work).</p> <p>Has the archaeological monitoring of geotechnical SI works which we corresponded on in April last year been completed yet? I assume that this report will be made available in due course, to consider together with the GS results?</p>	<p>Due to the scale of the Site we are looking to carry out scanning (Level 1 Prospection), likely at 1 x 0.25 m, although the precise details of the methodology will be determined in the WSI in consultation with the Geophysical subcontractor.</p> <p>Yes, the archaeological monitoring of GI works was completed last year, revealing limited results. Out of 27 test pits only a single shallow linear feature was noted (likely an undated field boundary). The results will be summarised in full in the forthcoming ES and the report will be available with the Geophysical Survey results.</p>
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1.4. POST PEIR CONSULTATION

Table 4 – Post PEIR Consultation

Consultee	Date (Method of Consultation)	Discussion	Summary of Outcome of Discussions
WCC Archaeologist	6 August 2019	Meeting to discuss Geophysical Survey results and proposed strategy for additional surveys and mitigation.	<p>The results of the Geophysics were discussed along with the proposed strategy for further evaluation and mitigation. The timing of the Stage 2 Trial trenching was discussed and it was agreed that further archaeological surveys could be carried out following DCO consent, with adequate timings in the main construction programme. The WCC Archaeologist proposed two options for mitigation (for the Onshore Cable Corridor/Converter Station Area):</p> <ol style="list-style-type: none"> 1. Stage 2 Trial trenching to inform subsequent mitigation OR 2. Archaeological Monitoring/Strip, Map and Sample on areas of topsoil stripping carried out at early stage (i.e. site wide strip pre-construction).
HCC Archaeologist	20 August 2019	Meeting to discuss Geophysical Survey results and proposed strategy for additional surveys and mitigation.	<p>It was agreed that Stage 2 trial trenching could be carried out following submission of the ES, on the proviso that the project can demonstrate a level of flexibility in terms of design (i.e. cable trench position or sequencing of construction). The HCC</p>

			Archaeologist, also indicated that further work along existing modern highways is unlikely to be required, except at the more sensitive areas along the Onshore Cable Corridor.
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