AQUIND Limited

AQUIND INTERCONNECTOR

Environmental Statement – Volume 3 – Appendix 23.1 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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TABLES

APPENDIX 23.1 CONSULTATION RESPONSES

1.1. SCOPING RESPONSES

Table 1 – PINS Scoping Responses

Scoping Opinion Ref.	Summary of Comment Received	How this has been addressed by the Applicant
Paragraph 25.3.1 Table C1 of Appendix C	On the basis of the information in the Scoping Report, the Inspectorate agrees that operational traffic emissions from the Proposed Development can be scoped out of the ES.	No further action required.
Paragraph 25.3.2	The Inspectorate notes that the Applicant intends to undertake qualitative assessments of effects during construction but that a quantitative assessment of potential impacts to local air quality from construction exhaust gas emissions is not proposed on the basis that the additional traffic generated is not expected to be above the indicative threshold presented in Environmental Protection UK and Institute for Air Quality (EPUK/IAQM) guidance documents either inside or outside the Air Quality Management Area ('AQMA'). On the basis of the numbers of additional traffic generated not exceeding the indicative threshold presented in EPUK/IAQM guidance documents either inside or outside the AQMA the Inspectorate agrees that this assessment can be scoped out.	See Paragraph 25.3.2 of Chapter 23 (Air Quality) of the Environmental Statement ('ES') Volume 1 (document reference 6.3.23.1)

1.2. PEIR CONSULTATION

Table 2 – PEIR Consultation

Consultee	Summary of Comment Received	How this has been addressed by the Applicant
Denmead Parish Council	**Convertor Station Emissions** Concern that no information has been provided about what will be emitted to air from the convertor station site.	**Convertor Station Emissions** It is within the ES scope to describe which pollutants are scoped in and out of the assessment from each element of the project. This is described in Chapter 23 (Air Quality) of the ES chapter.
Historic England	**Dust Deposition to Conservation Areas** Historic England expect to see assessment of dust emissions during on-shore cable and infrastructure construction to ensure Conservation Areas can still be appreciated during this phase of the project.	**Dust Deposition to Conservation Areas** Chapter 23 (Air Quality) of the ES includes an assessment of dust risk and commensurate mitigation measures to ensure that impacts on amenity, including at local Conservation Areas, is minimised during construction.
East Hants DC	**Ancient Woodlands at Convertor Station**	**Ancient Woodlands at Convertor Station** The risk if adverse impacts to ancient woodland in proximity to the convertor station have been assessed in Chapter

	Disagree that ancient woodland is scoped out of the PEIR due to nature of soils. **Trackout Emissions** Query on accuracy of assessment of risk from trackout emissions related to soil type and sensitivity of receptors. **Further Assessment Requested** To inform the CEMP.	23 (Air Quality) as ecological receptors following guidance from the Institute of Air Quality Management. Further detail is provided in Chapter 16 (Onshore Ecology) of the ES. **Trackout Emissions** It is within scope to reassess these emissions based on updated construction information and OS AddressBase datasets. The update is presented in Chapter 23 (Air Quality) of the ES. **Further Assessment Requested** It is within scope to reassess these emissions based on updated construction information and OS AddressBase datasets. The update is presented in Chapter 23 (Air Quality) of the ES and commensurate mitigation measures are described in Appendix 23.2 IAQM Construction Assessment) of the ES Volume 3 (document reference 6.3.23.2) and the Onshore Outline Construction Environmental Management Plan ('CEMP') (document reference 6.9)

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Hampshire CC	**<u>Environmental Impact Assessment- Need & Alternatives</u>** The County Council is particularly interested to understand the environmental impacts of routing the cable within the highway, as opposed to off-line, and the impact that such works will have on issues such as air quality. **<u>Environmental Impact Assessment- Cumulative Effects</u>** The EIA should include further details on the methodology used to identify and define the significance of potential intra-project effects.	**<u>Environmental Impact Assessment- Need & Alternatives</u>** With reference to Chapter 23 (Air Quality) of the ES, it is within scope to reassess construction site fugitive emissions and construction traffic based on the evolving project description. This includes for the determination of commensurate mitigation. **<u>Environmental Impact Assessment- Cumulative Effects</u>** For air quality, intra-project effects are embedded in the traffic data provided to inform the assessment of the impact from construction traffic. The derivation of these data is described in Chapter 22 (Traffic and Transport) of the ES Volume 1 (document reference 6.1.22).
Portsmouth City Council	**<u>2. Traffic and Transport (Chapter 21)</u>** 2.9 The City Council is currently in receipt of ministerial directives from DEFRA with regard to the Air Quality in Portsmouth. Whilst the areas subject to these directives are not located along	**<u>2. Traffic and Transport (Chapter 21)</u>** Detailed, quantitative assessment of construction traffic air emissions was assessed as additional traffic was found to meet the indicative threshold

	the proposed cable routing, it is likely that the works will result in diverting trips to the other two main routes which each have a ministerial directive placed upon them (A3 & A2047). Recent Air Quality modelling also suggests that the air quality in Portsmouth is worsening with the areas of exceedance likely to increase from 4 to approx. 12. Compliance in the areas subject to ministerial directives must be achieved by mid-late 2021, putting this date firmly within the construction period for this project. A sustained period of disruption as would be caused by the proposed works has the very real potential of contributing further to the poor air quality in Portsmouth and this in itself should be a key reason to consider alternative routes outside of the city. **3. Air Quality (Chapter 22)** 3.1 The PEIR appears to significantly downplay the potential effects on Air Quality, detrimentally impairing the ability of PCC to achieve its statutory obligations (see para 2.9 above).	presented in the IAQM Air Quality Planning Guidance document. The scope included the impact assessment on local air quality of construction generated traffic along the cable route and road closures and diversions. The AQMAs and the road links within Portsmouth for which Defra is required to report to the European Commission have been assessed following extensive consultation attempts with PCC regarding the IAQM threshold criteria. All road links for which traffic data was available from Systra that met the IAQM criteria for general roads and AQMAs were included in the air quality assessment. This includes diversions to the A3 and A2047 which are subject to ministerial directives. **3. Air Quality (Chapter 22)** As above.

1.3. POST PEIR CONSULTATION

Table 3 – Post PEIR Consultation

Consultee	Details of Consultation	Summary of Comment Received	How this has been addressed by the Applicant
EHDC	The Officer was presented with the initial dust assessment methodology, and as the Project grew was presented with traffic information.	Following a phone call, the dust assessment was approved, and any impacts related to traffic impacts were agreed to be minimal due to the temporary nature of the traffic diversions. The Officer was content that any assessment should be commensurate with the risks posed.	Chapter 23 (Air Quality) includes the IAQM dust assessment, and detailed assessment of traffic diversion emissions and construction traffic emissions.
WCC	The Officer was presented with the initial dust assessment methodology, and as the Project grew was presented with traffic information.	The Officer confirmed that the impact on the Winchester City Council area was minimal and that detailed assessment was not required due to the temporary nature of any changes and the lack of receptors. The outputs of the dust assessment would be satisfactory.	Chapter 23 (Air Quality) includes the IAQM dust assessment.
HBC	The Officer was presented with the initial dust assessment methodology, and as the Project grew was presented with traffic information. Requests were	The IAQM Dust Assessment methodology was approved, and agreement was reached on the requirement for assessment of the traffic impacts (both diversion and construction traffic). The Officer provided specific locations within	Chapter 23 (Air Quality) includes the IAQM dust assessment, detailed assessment of traffic diversion emissions and construction traffic emissions, and assessment of temporary

Consultee	Details of Consultation	Summary of Comment Received	How this has been addressed by the Applicant
	made at each stage as to whether assessment was required, and if the proposed level of assessment was adequate.	the local authority area that were relevant to the proposed development where traffic related air quality issues existed, and was happy to scope all other areas out of the assessment due to the magnitude of traffic flow changes, the lack of receptors present, or areas of road closure.	emissions from local power generation.
PCC	The Officer was presented with the initial dust assessment methodology, and as the Project grew was presented with traffic information and diesel generator information. Requests were made at each stage as to whether assessment was required, and if the proposed level of assessment was adequate.	The IAQM Dust Assessment methodology was approved, and agreement was reached on the requirement for assessment of the traffic impacts (both diversion and construction traffic). Further telephone consultation was undertaken regarding the nature of temporary and permanent generating capacity and the Officer requested that this element was also assessed.	Chapter 23 (Air Quality) includes the IAQM dust assessment, detailed assessment of traffic diversion emissions and construction traffic emissions, assessment of temporary emissions from local power generation, and assessment of permanent emissions from backup power generation.