

AQUIND Limited

AQUIND INTERCONNECTOR

Environmental Statement – Volume – Appendix 29.1 Cumulative Effects Assessment 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 29.1 CUMULATIVE EFFECTS ASSESSMENT CONSULTATION RESPONSES

1.1. INTRODUCTION

1.1.1.1. Consultation responses received in relation to the Cumulative Effects Assessment ('CEA') are presented in Tables 1 and 2 below. A summary of consultation in relation to the transboundary impact assessment is presented in Table 3. The tables provide a response to the comments received or signposting to where the comment is addressed in the Environmental Statement ('ES').

1.2. SCOPING CONSULTATION RESPONSE

Table 1 – Scoping Responses

Consultee	Date/Document	Comment	Response/where addressed in the ES
Planning Inspectorate ('PINS')	PINS Scoping Opinion	In light of the number of ongoing developments within the vicinity of the Proposed Development, the Applicant should clearly state which developments will be assumed to be under construction or operational as part of the future baseline.	Each topic chapter presents an appendix which provides the long list of developments that have been considered as part of the CEA. The long list of developments considered within marine chapters (Chapters 6-14) was consulted upon with the Marine Management Organisation ('MMO') and was updated in October 2019 in accordance to their advice. Figures 29.1 – 29.5 of the ES Volume 2 (document reference



			 6.2.29.1 – 6.2.29.5) illustrate the locations of developments considered for the marine CEA. Figure 29.6 of the ES Volume 2 (document reference 6.2.29.6) illustrates the locations of the developments considered for onshore CEA. Chapter 29 (Cumulative Effects) of the ES Volume 1 (document reference 6.1.29) and the associated appendices provide detail on the committed developments projects/plans that have been considered as part of the cumulative effects assessment for onshore assessments.
PINS	PINS Scoping Opinion	The ES should consider the potential for cumulative impacts with proposals to redevelop the Fraser Range site at Eastney and the North Portsea Coastal Defence scheme. The Applicant should seek to consult with the Eastern Solent Coastal Partnership ('ECSP') with regards to the latter and potential cumulative effects. The Applicant's attention is drawn to the comments of Natural England ('NE') the Environment Agency contained in Appendix 2 to the Scoping Opinion in this regard.	Consultation has been undertaken with the ESCP (see Consultation Report, document reference 5.1). The Applicant recognises the benefit of collaborative engagement and facilitated a workshop between Portsmouth Water, East Solent Coastal Partnership ('ESCP'), EA and HCC to discuss water issues at the Converter Station and along the Onshore Cable Corridor. Both ESCP and Fraser Range projects have been considered within the cumulative effects assessment presented in within onshore and marine CEAs presented in Chapter 29 (Cumulative Effects) and in each topic chapter.



PINS	PINS Scoping Opinion	A study area of 1 km surrounding the Proposed Development is proposed; however, no justification has been provided. The Inspectorate considers that projects and plans beyond this distance could give rise to cumulative effects on the same receptors. The ES must clearly state and justify the study area applied. Effort should be made to agree the scope of the cumulative assessment with relevant consultation bodies.	The Zone of Influence ('ZOI') for each individual ES topic is defined in Chapter 29 (Cumulative Effects) and for marine chapters, within the cumulative matrix which is appended to each topic chapter.
PINS	PINS Scoping Opinion	The Scoping Report presents limited detail regarding the methodology to be applied to the cumulative effects assessment and no reference to likely limitations. The ES should describe the assessment methodology applies and any limitations to the selection and assessment process.	The approach to assessing cumulative effects is described in Chapter 29 (Cumulative Effects) of the ES, including any limitation to the cumulative effects assessment.
PINS	PINS Scoping Opinion	The Scoping Report does not make clear whether the Applicant intends to 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. The Inspectorate considers that cumulative effects on heritage and archaeological	Cumulative effects assessment within Chapter 14 (Marine Archaeology) of the ES Volume 1 (document reference 6.1.14) does consider potential effects on marine archaeology receptors at Landfall below Mean High Water Spring. However, given that the method of cable installation is Horizontal Directional Drilling ('HDD') underneath the beach at Eastney, the



receptors that could be significantly affects by the Proposed Development should be included in the ES.	Landfall location for the purposes of cumulative assessment within Chapter 14 (Marine Archaeology) is considered to be the HDD marine exit/entry point which is located beyond 1
	km along the Marine Cable Corridor. The ZOI for the marine archaeology cumulative assessment is considered to be the spatial extent of the Marine Cable Corridor.
	The cumulative effects assessment within Chapter 21 (Heritage and Archaeology) of the ES Volume 1 (document reference 6.1.21) considers the proposed developments within 2 km of the converter station and within 500 m of the landfall. Above ground built heritage setting impacts have been scoped out along the cable route.



1.3. PEIR CONSULTATION RESPONSES

Table 2 – PEIR Responses

Consultee	Date/Document	Comment	Response/where addressed in ES
MMO	PEIR Response April 2019	It should be considered whether there will be in combination effects from project activities on seabed features, for example the deposition of dredged material, and whether this will affect the recoverability of bedforms which have been levelled nearby.	Chapter 6 (Physical Processes) assesses the potential in combination effects from project activities on seabed features. This has been assessed in Section 6.7 of this chapter.
ММО	PEIR Response April 2019	Section 6.6.5 sets out the approach to cumulative effects assessment, identifying the IFA2 interconnector as well as the French component of the Aquind project as potentially interacting projects and the interaction will be further assessed in the ES.	The cumulative effects associated with these projects and the Proposed Development has been assessed in Appendix 6.4 and Section 6.7 of this chapter.
MMO	PEIR Response April 2019	Potential cumulative and inter-related impacts and effects on the physical and biological environment are identified in Section 7.6.5.4. It is noted that the cumulative assessment of the relevant projects is yet to be undertaken and this will be detailed in the ES when more detailed modelling work has been undertaken.	Plume dispersion modelling has been undertaken to inform the impact assessments and cumulative assessments on the physical and biological environment. The modelling results are presented in Appendix 6.2 and Chapters 6, 7, 8, 9, 10 and 11 use the outcomes of the modelling to undertake their assessments. Appendix 7.1 presents the findings of the Water Framework Directive ('WFD') (Appendix 7.1



Consultee	Date/Document	Comment	Response/where addressed in ES
			of the ES Volume 3 (document reference 6.3.7.1)). The Habitat Regulations Assessment ('HRA') Report (document reference 6.8) and Marine Conservation Zone ('MCZ') Assessment (Appendix 8.5 of the ES Volume 3 (document reference 6.3.8.5)) also use this modelling to inform assessment on designated sites and their features.
MMO	PEIR Response April 2019	It is noted that the cumulative assessment of the relevant projects is yet to be undertaken and this will be detailed in the ES when more detailed modelling work will have been undertaken which is an appropriate approach.	Plume dispersion modelling has been undertaken to inform the impact assessments and cumulative assessments on the physical and biological environment. The modelling results are presented in Appendix 6.2 and Chapters 6, 7, 8, 9, 10 and 11 use the outcomes of the modelling to undertake their assessments. The HRA Report (Document Ref. 6.8) and MCZ Assessment (Appendix 8.5) also use this modelling to inform assessment on designated sites and their features.
ММО	PEIR Response April 2019	The impact assessment does not consider potential cumulative effects of this project in combination with other activities that may	A cumulative impact assessment has been undertaken and is presented in Section 9.7 of Chapter 9 (Fish and Shellfish).

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Consultee	Date/Document	Comment	Response/where addressed in ES
		impact upon the downs herring population.	Chapter 9 (Fish and Shellfish) now considers the potential cumulative effects of this project in combination with other activities that may impact upon the downs herring population.
ММО	PEIR Response April 2019	Some aggregate licence areas are located within 2 km to the proposed cable route and therefore considerate should be considered whether there is the potential for cumulative effects between the proposed interconnector installation activities and marine aggregate dredging.	The cumulative assessment has been updated to include consideration of aggregate dredging sites in Appendix 9.1 and as shown in Figure 29.3 of the ES Volume 2 (document reference 6.2.29.3).
NE	PEIR Response April 2019	NE understands that a separate marine licence will be sought for any required unexploded ordnance detonations. However, consideration should be given in the cumulative effects assessment to the potential cumulative impact of UXO detonations, in-combination with both other work being undertaken for AQUIND and other plans and projects in the vicinity of the project.	The potential requirement for UXO clearance has been considered within the cumulative effects assessment within this chapter. However, because UXO surveys have yet to be conducted, and any removal work required will precede all other preparation and construction works by a number of months, detailed consideration, and therefore a meaningful assessment, has not been possible. Therefore, a cumulative effects assessment



Consultee	Date/Document	Comment	Response/where addressed in ES
			will be included as part of the Marine Licence application for UXO work, should one be necessary. This approach has been agreed with the MMO in a meeting in September 2018 and with NE in a meeting in February 2019 (see Consultation Report) The HRA Report presents the assessment of in combination effects on UK and non-UK designated sites.
NE	PEIR Response April 2019	It is assumed that outcomes of the cumulative effects assessment will be updated as required for the final ES.	Chapter 11 (Marine Ornithology) presents the updated cumulative effects assessment for marine ornithology receptors. The HRA Report presents the assessment of in combination effects on UK and non-UK designated sites.
ММО	PEIR Response April 2019	The MMO notes that Figure 12.9 identifies that the sandeel fishery coincides with the UK inshore section of marine cable corridor. The MMO recommends that the ES considers potential in combination effects to sandeel from habitat loss and fishery displacement.	The sandeel fishery is not a commercial fishery and is a very small-scale fishery that is used by recreational anglers to collect bait. Chapter 12 (Commercial Fisheries) describes the nature and scale of this fishery and it will be assessed as part of the inshore fisheries group. Separate cumulative assessments have been presented within the ES that examine



Consultee	Date/Document	Comment	Response/where addressed in ES
			the potential in combination impacts of projects on sandeels (as fish receptors in Chapter 9 (Fish and Shellfish) and Appendix 9.2 (Fish and Shellfish Cumulative Affects Assessment Matrix) (document reference 6.3.9.2) and commercial fisheries receptors (as in Chapter 12 (Commercial Fisheries) and Appendix 12.3).
Southern IFCA	PEIR Response April 2019	It is appreciated that the impacted area may be considered small, however the assessment that the inshore fleet can move, or switch gears, may not accurately reflect the adaptability of inshore fishing vessels. The limited availability of quota, restrictions on bass fishing, Marine Protected Area regulations and other marine works, particularly in areas such as the Solent, limit the adaptability of the fleet. The options to diversify when ground is lost is limited by the above factors, and those fisheries which could be considered alternatives are typically subject to their own seasonal trend and catch fluctuations. It is noted that a cumulative assessment will be made considering other marine works, it may be appropriate to consider other non-	The baseline of Chapter 12 (Commercial Fisheries) (Section 12.5) has been updated to make reference to these restrictions that the inshore fleet is subjected to. These pressures have also been considered in the assessment of cumulative effects on the inshore fishery. The cumulative assessment for this chapter can be found in Appendix 12.3 (Commercial Fisheries Cumulative Assessment Matrix) document reference 6.3.12.3) and Section 12.7.



Consultee	Date/Document	Comment	Response/where addressed in ES
		construction impacts the fisheries may be subject to, such as those mentioned above when considering the impact to the fishery.	
MMO	PEIR Response April 2019	It is noted that cumulative transboundary effects to commercial shellfisheries will be evaluated within the ES. As part of this evaluation consideration should be made in the ES for the temporary or permanent displacement of fishing effort (e.g. scallop dredging) which is currently a contentious issue within the Channel region in terms of access to alternative grounds.	A cumulative assessment is presented within Chapter 12 (Commercial Fisheries) which assesses the impacts of transboundary (French) projects on UK fleets as well as other country fleets (French, Belgian and Dutch) within the cumulative assessment. Chapter 12 (Commercial Fisheries) also assesses the transboundary effects of the proposed development on non-UK fleets that use the UK marine area. Displacement of fishing vessels (including French scallop dredgers) has been assessed in this chapter.
НСС	PEIR Response April 2019	Cumulative effects of inter and intra projects need to be considered	Inter-projects effects have been considered in Appendix 15.9 (Cumulative Effects Assessment Matrix (Stage 1 & 2)) and 15.10 (Cumulative Effects Assessment Matrix (Stage 3 & 4)) of the ES Volume 3 (document reference 6.3.15.9 and 6.3.15.10). Intra-project effects are



Consultee	Date/Document	Comment	Response/where addressed in ES
			considered in Section 29.6 of Chapter 29 (Cumulative Effects).
НСС	PEIR Response April 2019	Not enough detail on trees. In scheme cumulative effects to be assessed	Impacts on trees have been considered in Chapter 15 Landscape and Visual Amenity (document reference 6.1.15).
PCC	PEIR Response April 2019	Proposed traffic modelling of traffic management is not appropriate and wider network assessments are required to detail cumulative impacts, especially on those routes deemed most sensitive.	Wider network and cumulative assessments have been completed using the SRTM, with full analysis of results provided within the Transport Assessment and Chapter 22 of the ES.
HBC	PEIR Response April 2019	It is noted that the applicant acknowledges that they do not yet have a full understanding of the impact on the cable corridor works on the highway network. It is outlined that "Prior to completion of the Environmental Statement, further traffic surveys will be completed at key links where traffic flows have not been available for inclusion in the PEIR to allow for a complete assessment of all links that form part of the study As such whilst the potential for significant cumulative environmental effects will be	Further traffic surveys have been completed to inform the existing conditions. Wider network and cumulative assessments have been completed using the SRTM, with full analysis of results provided within the Transport Assessment and Chapter 22 of the ES.

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Consultee	Date/Document	Comment	Response/where addressed in ES
		assessed in the Environmental Statement that accompanies the DCO. This is too late to be able to influence the proposal, consider the cumulative impacts on HBC.	
WCC	PEIR Response April 2019	Further information required on assessment of impacts of traffic management proposals, namely traffic signals on Hambledon Road. These impacts have been underreported given comments on total length of construction period	Further details of the traffic management proposals are included within the Framework Traffic Management Strategy. An assessment of the impact of traffic signals on Hambledon Road is included within the Transport Assessment and Chapter 22 of the ES.
HBC	PEIR Response April 2019	There are a number of planned highway works, by the Highway Authority, primarily in relation to Waterlooville MDA and including Ladybridge Roundabout. Consideration must be given to this committed scheme and the timescales required for its delivery. HBC and the Highway Authority will need to be satisfied that the works proposed through this scheme can be delivered without prejudicing the committed scheme from the MDA.	All committed and planned highways works will be fully considered as part of the detailed traffic management programme that will be developed prior to construction.



Consultee	Date/Document	Comment	Response/where addressed in ES
HBC	PEIR Response April 2019	The project team should be aware that as there are other significant works planned in the area, primarily because of the Waterlooville MDA and other strategic sites emerging within the local plan. Discussions regarding programming should be proactively held with the Highway Authority to ensure that road space conflicts are managed. Early engagement and coordination of programmes should be had with HBC and the Highway Authority to reduce delays to any committed projects.	All committed and planned highways works will be fully considered as part of the detailed traffic management programme that will be developed prior to construction. Engagement with the Highway Authority will follow requirements of the New Roads and Streets Work Act 1991.
нсс	PEIR Response April 2019	The EIA should include further details on the methodology used to identify and define the significance of potential intra-project effects.	Section 29.6 of Chapter 29 of the ES Volume 1 (document reference 6.1.27) outlines the methodology used for the assessment of intra-project effects.
HCC	PEIR Response April 2019	Further discussions required with HCC regarding committed and future schemes along the proposed cable corridor. This is to ensure that construction does not prejudice these schemes and so construction programmes do not conflict.	The Local Planning Authority's respective planning portals were used to obtain information on schemes to be considered. A sifting process was undertaken to ensure committed developments were considered in the cumulative assessment in line with PINS Advice Note Seventeen (PINS, 2019).

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1.4. TRANSBOUNDARY IMPACT CONSULTATION RESPONSES

Table 3 – Summary of Consultation in Relation to Transboundary Impact Assessment

Consultee	Date/Document	Comment	Response/where addressed	
Chapter 8 (I	Chapter 8 (Intertidal and Benthic Ecology) of the ES Volume 1 (document reference 6.1.8)			
ММО	PEIR Response April 2019	The potential transboundary impacts have been considered in Section 8.6.6. While there is potential for any sediment plume arising to extend into French waters, transboundary impacts are not considered to have the potential to be significant. The MMO support this conclusion.	Noted.	
Chapter 12 (Commercial Fisheries)				
MMO	PEIR Response April 2019	It is noted that cumulative transboundary effects to commercial shellfisheries will be evaluated within the ES. As part of this evaluation consideration should be made in the ES for the temporary or permanent displacement of fishing effort (e.g. scallop dredging) which is currently a contentious issue within the Channel region in terms of access to alternative grounds.	A cumulative assessment is presented within Chapter 12 (Commercial Fisheries) which assesses the impacts of transboundary (French) projects on UK fleets as well as other country fleets (French, Belgian and Dutch) within the cumulative assessment. Chapter 12 (Commercial Fisheries) also assesses the transboundary effects of the proposed development on non-UK fleets that use the UK marine area.	
MMO		effects to commercial shellfisheries will be evaluated within the ES. As part of this evaluation consideration should be made in the ES for the temporary or permanent displacement of fishing effort (e.g. scallop dredging) which is currently a contentious issue within the Channel region in terms of	Chapter 12 (Commercial assesses the impacts of (French) projects on UK other country fleets (Fren Dutch) within the cumula Chapter 12 (Commercial assesses the transbound proposed development o	



Consultee	Date/Document	Comment	Response/where addressed	
			French scallop dredgers) has been assessed in this chapter.	
Chapter 29 (Chapter 29 (Cumulative Effects)			
PINS	December 2018 Scoping Opinion	The Inspectorate notes that assumptions have been made regarding potential impacts and mitigation measures to conclude that there is unlikely to be significant transboundary effects; however, such effects are stated as yet to be explored in the corresponding aspect chapter (e.g. through sediment modelling). Limited information has been also provided with regard to the location of potential sensitive receptors in other EEA States. The Inspectorate notes reference in Appendix E to and the intention to consider transboundary effects in the EIA process. In accordance with the EIA Regulations, the ES should include a description of the likely significant effects as a result of the Proposed Development, including transboundary effects.	Transboundary effects within each chapter have been assessed through identification of particular impacts that could cause transboundary effects (e.g. increases in suspended sediments) using the same methodology undertaken for the EIA. Transboundary effects have also been considered through the inclusion of projects from other Member States (namely, France) in the cumulative assessment (e.g. see Figure 29.2 of the ES Volume 2 (document reference 6.2.29.2)). Chapter 12 (Commercial Fisheries) also assesses potential impacts on not only the UK fishing vessels and fleets but also those from France, Belgium and Netherlands. The potential environmental effects on features of French Natura 2000 sites has also been assessed within the HRA Report.	

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