

# Joint Scoping Opinion

**Marine Works (Environmental Impact Assessment) (Amendment) Regulations 2017 (“the Regulations”)**

**Town and Country Planning (Environmental Impact Assessment) Regulations 2017**

**Title: UK - France HVDC Interconnector Onshore UK & Offshore UK**

**Applicant: AQUIND Limited**

**Address of applicant: OGN House, Hadrian Way, Wallsend, Tyne and Wear, NE28 6HL**

**MMO Reference: EIA/2018/00011**

**PCC Ref: 18/00001/EIASCO**

**Date: April 2018**



Marine  
Management  
Organisation



Portsmouth  
CITY COUNCIL

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**Appendix A** Marine Management Organisation Scoping Opinion dated xxxx  
**Appendix B** Various Consultee Responses to Scoping Referral

## 1. Summary

The following Scoping Opinion brings together the scoping opinion of the Marine Management Organisation in relation to The Marine Works (Environmental Impact Assessment) (Amendment) Regulations 2017 and the scoping opinion of Portsmouth City Council in relation to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 Scoping Opinion.

Under the Coastal Concordat, the Local Planning Authority (LPA) has worked with the Marine Management Organisation (MMO) to issue a joint scoping opinion. This Scoping Opinion Report seeks to bring together all of responses from the consultees involved in the scoping process and includes the requirements of the MMO and PCC to form a joint Scoping Opinion for this proposal.

## 2. Proposal

Development of a new subsea and underground High Voltage Direct Current (HVDC) power cable transmission, designed as two independent links each of 1000MW capacity, between Normandie in France and the south coast of England together with converter stations in both the UK and France.

## Project Background -

The project proposes a cable route of around 245km (circa 152 miles) connecting the UK and French transmission networks. Converter stations would be constructed at Lovedean (Hampshire) and Barnabos (Normandie). The underground cable route would connect with the subsea cable from its landing points either side of the Channel. The proposed landfall point at Eastney to the new converter station at Lovedean is an approximate distance of 18km.

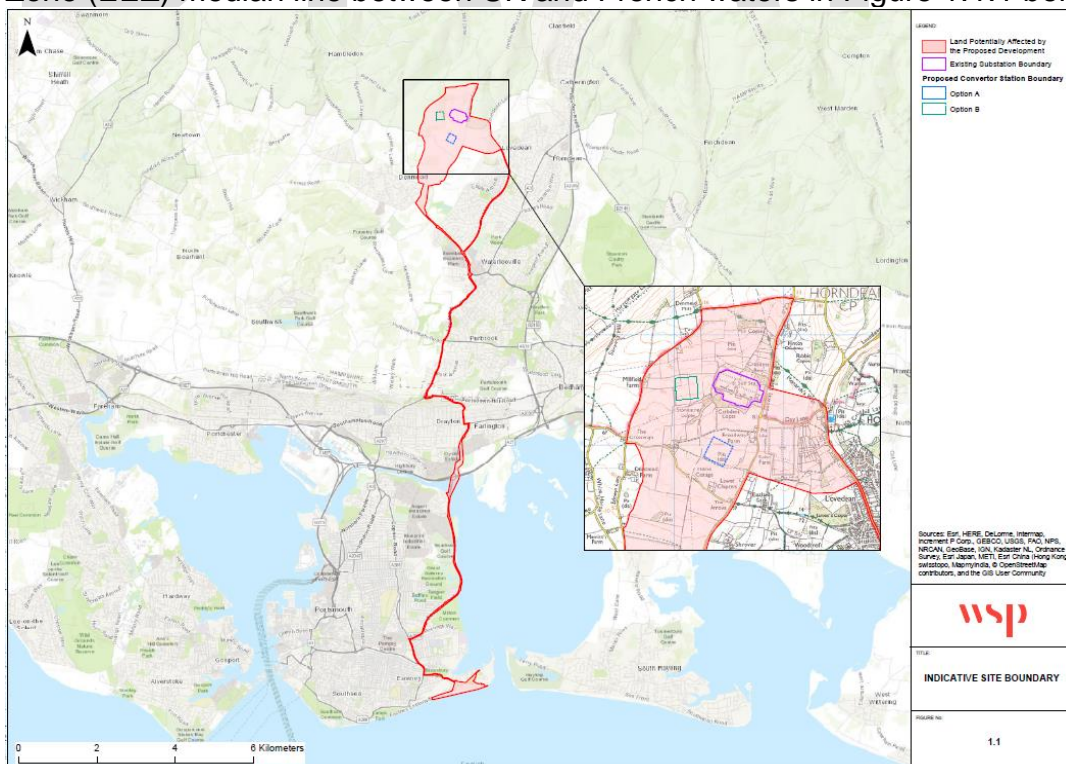
The mean high water spring (MHWS) level marks the extent of the offshore environment. The offshore works form the section of cabling between MHWS mark at the UK landfall location in the Solent to the European Economic Zone (EEZ) median line, between UK and French waters in the Channel.

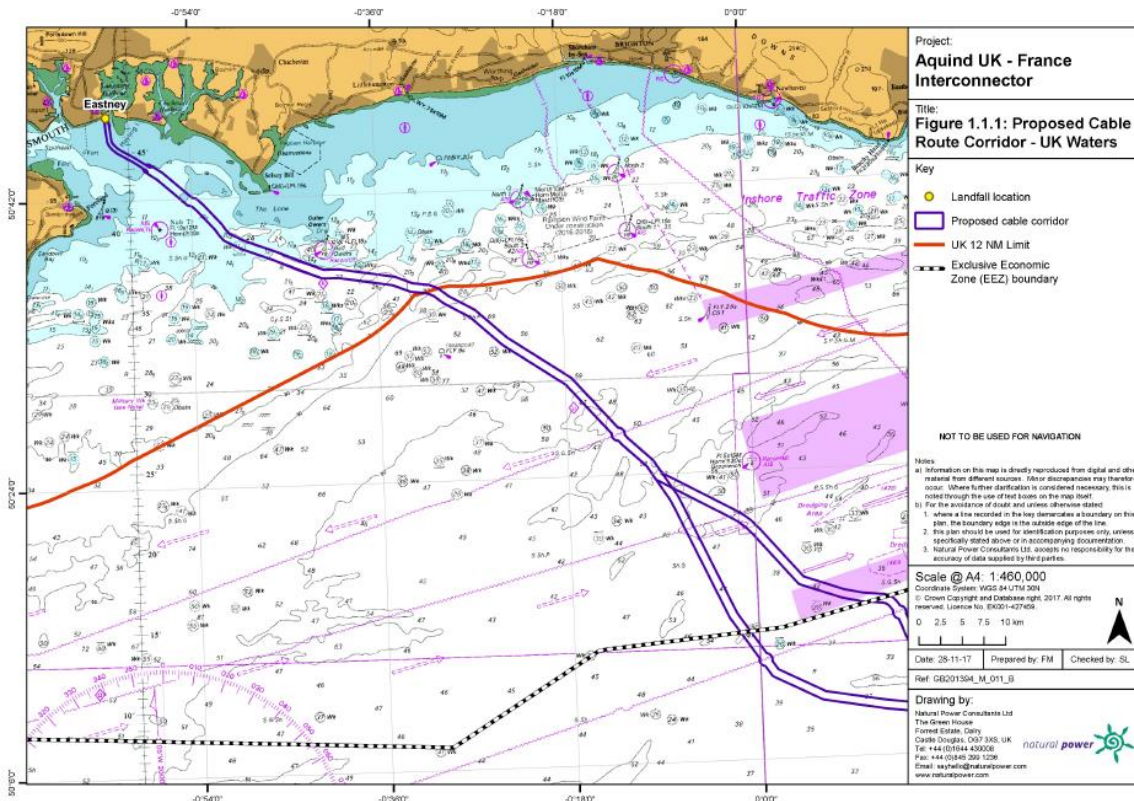
The landing point is where subsea cables reach land. The onshore and subsea cables would be joined at a Transition Joint Bay (TJB) designed as a buried structure excavated to depth between 1.5m to 3m and constructed with concrete floors/walls backfilled with soil and sealed with a lid. The exact location is presently unspecified. The size of the buried TJB structure is typically 12m x 3m. At ground level the land will be reinstated to its original condition following construction.

The project is anticipated to take 3 years (2019-2022), with a design life of 40 years.

## 3. Location

The Onshore and Offshore Scoping reports cover all elements of the proposal within the UK for converter station, cable route and landfall displayed in Figure 1.1 and MHWS mark at the UK landfall location in the Solent to the European Economic Zone (EEZ) median line between UK and French waters in Figure 1.1.1 below.





## 4. Consultations

In considering the documents supplied, PCC consulted with internal advisors and those external bodies considered appropriate due to their environmental responsibilities - those that responded were:

- Environment Agency;
- Langstone Harbour Board;
- Historic England;
- Natural England;
- Hampshire & Isle of Wight Wildlife Trust;
- Southern Water;
- Local Highways Authority;
- COLAS;
- Historic Environment - Archaeology;
- Ecology
- Environmental Health (PCC); and,
- Contaminated Land Team (PCC).

## 5. Overall Scope of the Environmental Statement

In summary, the Environmental Statement should contain the following:

- Project Description
- Alternatives Considered

Aspects of the environment likely to be significantly effected, marine and land based:

### - Offshore

Benthic ecology  
Fish and shellfish ecology  
Ornithology  
Marine mammals  
Nature Conservation  
Commercial fisheries  
Shipping and navigation  
Other marine users  
Marine archaeology and cultural heritage  
Landscape and seascape

### - Onshore

Traffic and transport  
Air quality  
Noise and vibration  
Landscape and visual  
Heritage and archaeology  
Ecology (with arboriculture)  
Socio-economics  
Water resources and Flood risk  
Ground conditions  
Carbon and climate change  
Human health  
Soils and Land use  
Electric and Magnetic fields  
Waste and Material resources

- Mitigation Measures
- Non-technical Summary, including a frequently asked questions document
- Planning Statement covering emerging plans such as South Marine Plan, changing regulations and the planning policy framework across marine and land, updates to Solent Wader and Brent Goose Strategy
- Any important limitations or gaps in the data, information or forecasts relied on in the ES

The ES should cover and combine where relevant both land and marine based topics, and present as a single document.

There are a number of potential effects proposed to be scoped out of ES – refer to comments in each of the following ES topic areas, in the order described in the scoping report.

Appendix A to detail fully the requirements from the MMO in relation to the above topic areas. Refer to the MMO Scoping Opinion in relation to the key environmental designations which are relevant to both land and marine assessments. The remaining sections of this Joint Scoping Report provide detailed comment on some of the land based elements which will form part of the ES.

Refer to Appendix B where these are in part detailed by consultees. The following sections clarify the scope in part.

## 6. Traffic and Transport

PCC consulted the Local Highways Authority. PCC do not expect adverse local highway impacts from the proposal once constructed and agree that the significant effects of the transport-related component of the ES is limited to the construction phase. The LHA considers the significant impacts will be experienced by all road users on the highway network in Portsmouth. Mitigation of disruption and delay should be effectively managed by detailed Construction Traffic Management Plan(s) (for each phase). Location, access and design of the construction compounds should be addressed in the proposal along with travel options for onsite staff, encouraging sustainable transport modes.

A consultation response from COLAS (responsible under PFI contract for repair and maintenance of the city's highway network) identify a need for co-ordination and restrictions during major events.

## 7. Air Quality/ Noise and Vibration

PCC consulted Environmental Health and confirm the proposal will not generate any emissions to air when in use and the operational noise along the cable route is expected to be negligible.

However, the comments of Natural England and HCC Ecologist considers that potential noise and vibration impacts on ecologically sensitive receptors are included within the assessment work for the ES on effects to qualifying overwintering bird populations including 'impact-type' noise from construction activity. The Ecologist suggests extending the distance (beyond the 50m of the site boundary and construction routes) that air quality impacts on ecologically sensitive receptors are captured by the assessment.

PCC otherwise agree with the Scoping Report approach.

## 8. Landscape and Visual

The effects on landscape/seascape associated for the landing point/TJB will be short-term and land reinstated following construction.

Natural England consider the landscape and visual assessment should also include the cumulative effect of the development with other relevant existing and proposed developments in the area that due to overlapping timescale are likely to be material at the time of determination of any planning application.

PCC otherwise agree with the proposed approach contained in the Scoping Report within its respective administrative boundary.

## 9. Heritage and Archaeology

Comments by Historic England dated 26<sup>th</sup> March and HCC Archaeologist dated 1<sup>st</sup> March clarify elements which should be included in the assessment and ES. It raises particular concern for Fort Cumberland - Scheduled Ancient Monument/Grade II\* listed building - or areas in close proximity to the Fort (including an earlier Eastney Fort), both as upstanding structures and buried archaeological deposits.

PCC agree that the development could potentially have an impact on heritage assets, and therefore the appropriate level of engagement with the Hampshire County Archaeologist, and Conservation Officer is encouraged.

## 10. Ecology

Comments by Natural England dated 21<sup>st</sup> March clarify elements which should be included in the assessment and recommends a separate chapter providing specific information to support a Habitats Regulations Assessment is included in the ES, as well as measures to secure biodiversity enhancement. NE also considers the ES assess plans and projects which are reasonably foreseeable – identifying the potential impact on the vegetated shingle by redevelopment of the Fraser Range site at Eastney and coastal defence scheme. Refer to Appendix B for NE, Hampshire & Isle of Wight Wildlife Trust, HCC Ecologist and Langstone Harbour Board comments.

The HCC Ecologist comments on the areas/habitat used by relevant bird populations moving between SPAs and, for example, areas of shingle and sea defences outside of SPA boundaries that can support important high-tide wader roosts. A review of the Solent Wader and Brent Goose Strategy which is anticipated to be available in 2019, with an interim statement shortly, should be incorporated into any further review of the HRA and EIA.

Refer to Appendix A for the MMO detail comments on this area.

It is noted that as the scheme progresses a review will be undertaken in relation to the HRA so as to confirm that no likely significant effects would result. Until the HRA is reviewed there is uncertainty which PCC/MMO will need clarified.

## 11. Socio-economics

Comments of the LHA highlight significant impacts by all road users along the routing of the cable during construction, which are mostly classified roads and form the Eastern corridor linking the eastern areas of Portsmouth to the national strategic network. In addition to all road users there is an existing ambulance station located on Eastern Road likely to be effected by disruption and delay to the local highway network. Further, there are a range of local businesses (shops and other services) also likely to be significantly effected by disruption and changes to the local highway network during the construction stage, notably from the junction of Bransbury Road/A288 Eastney Road to the junction of A2030 Velder Avenue/A288 Milton Road.

## 12. Water Resources and Flood Risk/ Ground conditions

Comments by the Environment Agency dated 21<sup>st</sup> March, Southern Water dated 14<sup>th</sup> March and Contaminated Land dated 15<sup>th</sup> March clarify elements which should be included in the assessment and ES. The route of the cables will go through a number of historical landfill sites. The EA considers a WFD assessment to be required for all elements of the work that fall within, or have the potential to affect, a WFD water body and any protected areas therein.

The scheme design needs to consider the siting and location of existing drainage assets, their location, ownership, whether they are highway drainage assets, redundant or Southern Water assets.

Refer to Appendix B for detailed comments by the EA, SW and CLT.

## 13. Conclusion

The topics highlighted in this scoping opinion should be assessed during the EIA process and the outcome of these assessments should be documented in the ES in support of the marine licence application and the planning application(s). This statement, however, should not necessarily be seen as a definitive list of all EIA requirements. Given the scale and programme of these planned works other work may prove necessary.

The fact that the Local Planning Authority and the Marine Management Organisation broadly accepts the content of the Scoping Report, this Joint Scoping Opinion does not prevent the Authorities from requesting further information at a later stage. It should also be noted that no indication of the likely success of any planning application or licence application is implied in the expression of this Opinion.



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26<sup>th</sup> April 2018



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**13<sup>th</sup> March 2018**

**Your Ref: 18/00001/EIASCO  
Our Ref: 14.20.10.2**

Dear Mr Banting

**PROPOSAL: EIA SCOPING ON AQUIND INTERCONNECTOR**

**LOCATION: EASTNEY BEACH, EASTNEY ESPLANADE, SOUTHSEA**

**DESIGNATED SITES: CHICHESTER AND LANGSTONE HARBOURS - RAMSAR, SPECIAL PROTECTION AREA (SPA); POTENTIAL SPECIAL PROTECTION AREA – pSPA  
SOLENT MARITIME – SPACIAL AREA OF CONSERVATION (SAC)  
LANGSTONE HARBOUR – SITE OF SPECIAL SCIENTIFIC INTEREST  
EASTNEY BEACH, MELVILLE ROAD VERGE, LAND WEST OF FORT CUMBERLAND – SITES OF IMPORTANCE FOR NATURE CONSERVATION**

Thank you for consulting the Wildlife Trust on this EIA Scoping Opinion. We are aware of these proposals and have responded to the recent public consultation on the matter. Whilst we do have some concerns with the proposals, these are generally located outside of the Portsmouth area and therefore not relevant to this consultation. Our concerns with proposals in the PCC area all relate to the potential for significant effects on ecology and are summarised as follows;

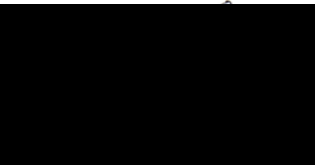
1. The proposals are located within close proximity to the Chichester and Langstone Harbours Ramsar, SPA, the Solent Maritime SAC and the proposed Solent SPA, as such there is the potential for significant adverse effects to occur. Avoidance measures will need to be put in place to ensure that the integrity of these sites is not adversely impacted. Such measures may include avoiding works during the sensitive over wintering period, noise abatement measures and avoiding sensitive SAC features.
2. Eastney Beach forms an extensive area of coastal vegetated shingle, which is designated at county level for its semi-natural coastal habitats and supporting species.
3. Eastney beach is also included in the Solent Wader and Brent Goose Strategy as a secondary support area and is used by over-wintering waders as a roost site and occasionally by brent geese. This site is located outside of the boundary of the coastal SPA, but is evidently functionally linked to it.
4. There are also historic records of the common ringed plover *Charadrius hiaticula* nesting on Eastney Beach during the summer months; this species has declined dramatically in recent

years due to trampling and disturbance during the nesting season. In the UK it is now included on the Red List of Birds of Conservation Concern<sup>1</sup>.

5. National Planning Policy requires proposals to deliver no net loss in biodiversity and net gains, where possible; in addition the Natural Environment and Rural Communities (NERC) Act 2006 (section 40) requires a public authority, in exercising its functions, to conserve biodiversity. Furthermore, the Government has identified the need to deliver environmental net gain through the planning system in their 25 Year Environmental Plan, if the decline in biodiversity is to be stopped. In order for these development proposals to deliver net gains in biodiversity, it would need to be demonstrated that they will not impact biodiversity both within the development footprint and the wider countryside. It will therefore be essential that detailed ecological information is provided in order that sensitive habitats can be avoided, and where that is not possible robust mitigation measures proposed, or compensation, where required.
6. Recent studies have shown a dramatic decline in biodiversity and that in order to reverse these declines better methods of accounting, mitigating and compensating human impacts on biodiversity are required. To simply aim for a 'no net loss' through the planning system is no longer acceptable and, will not stop the decline, as such all development proposals should seek to deliver 'net gains' in biodiversity. Many local authorities are now using a metric to evaluate the loss and gain of biodiversity and to assess avoidance, mitigation and, where necessary, compensation measures. Therefore if the council is to make a transparent and auditable account of biodiversity on the site, we strongly recommend the use of the biodiversity metric. This will help ensure the council delivers its obligations under the NERC Act, achieve robust assessments of impacts, design effective mitigation or, if required compensation, and provide true net gains in biodiversity.

The above advice is given based on the information made available at this time and may change should further or amended details be submitted. We trust that you will find our comments helpful and if you wish to discuss these matters further, please do not hesitate to do so. I also ask that you keep the Trust informed of the progress of these proposals.

**Yours sincerely**



**Trevor Codlin MCIEEM**  
**Senior Specialist for Planning & Development**

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<sup>1</sup> Eaton MA, Aebischer NJ, Brown AF, Hearn RD, Lock L, Musgrove AJ, Noble DG, Stroud DA and Gregory RD (2015) Birds of Conservation Concern 4: the population status of birds in the United Kingdom, Channel Islands and Isle of Man. *British Birds* 108, 708–746.

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Your Ref

18/00001/EIASCO

Our Ref

PLAN-022061

Date

14/03/2018

Dear Sirs,

**Proposal: EIA scoping on AQUIND interconnector.**  
**Site: Eastney Beach, Eastney Esplanade, Southsea, PO7 6HW.**  
**18/00001/EIASCO**

Thank you for your letter of 28/02/2018.

Further to your scoping/ screening document for the above site I have the following observations to make in respect of the proposed development:-

- Southern Water's current sewerage records shows that there are multiple public sewerage infrastructure (minor and major) within the boundaries or the proposed works. The exact position of this public apparatus must be determined on site by the applicant. No excavation, mounding, new development/building works or tree planting should be carried out close to the existing sewers. Reference should be made to our guidance on standoff distances of the public apparatus:  
<https://www.southernwater.co.uk/media/default/PDFs/stand-off-distances.pdf>
- Furthermore, due to changes in legislation that came in to force on 1st October 2011 regarding the future ownership of sewers it is possible that a sewer/s now deemed to be public could be crossing the above property.
- Any works within highway / access road will need to be agreed and approved by SW under NRSWA enquiry in order to protect public apparatus.
- It may be possible that also land located within Southern Water's ownership (Pumping Stations sites and Wastewater Treatment Works sites) may be affected by the above proposals. The developer is required to discuss the matter further with Southern Water.



- Southern Water requires existing access arrangements to Waste Water Treatment Works and Pumping Stations sites to be maintained with regards to unhindered 24 hour / 7 days a week access. Southern Water operates a closed gate policy during maintenance works for Health and Safety reasons

If you require any further information please do not hesitate to contact this office on the numbers above.

Yours sincerely



Developer Services

Date: 21 March 2018  
Our ref: 240764  
Your ref: 18/00001/EIASCO



FAO – Alan Banting, Portsmouth City Council

**BY EMAIL ONLY**

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Dear Alan

**Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the EIA Regulations 2017):** 18/00001/EIASCO EIA scoping on AQUIND interconnector  
**Location:** Eastney Beach Eastney Esplanade Southsea

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in your consultation dated 27 February 2018 which we received on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Case law<sup>1</sup> and guidance<sup>2</sup> has stressed the need for a full set of environmental information to be available for consideration prior to a decision being taken on whether or not to grant planning permission. This letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for this development. In addition to the information included in the scoping report, the following issues and sensitivities have been identified for detailed examination in the EIA.

### **Ecology**

We note the information included in the scoping report with regard to the assessment of designated and non-designated sites, protected species, priority habitats and species, and wider biodiversity. Natural England does not hold locally specific information relating to protected species, local or national biodiversity priority habitats and species, local sites (biodiversity and geodiversity) and local landscape character. These remain material considerations in the determination of this forthcoming planning application and we recommend that you seek further information from the Hampshire Biodiversity Information Centre and other appropriate bodies. In some instances, further surveys may be necessary through an ecological appraisal to be agreed by a Hampshire County Council (HCC) ecologist.

### **Designated sites**

We note that the study area boundary includes internationally designated sites within 10km and nationally designated sites within 2km. While Portsmouth Harbour SSSI falls just outside of this 2km boundary, potential impacts upon overwintering birds will still be assessed as part of the Portsmouth Harbour SPA and Ramsar site which have been screened-in in table 10.2.

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<sup>1</sup> Harrison, J in *R. v. Cornwall County Council ex parte Hardy* (2001)

<sup>2</sup> *Note on Environmental Impact Assessment Directive for Local Planning Authorities* Office of the Deputy Prime Minister (April 2004) available from

<http://webarchive.nationalarchives.gov.uk/http://www.communities.gov.uk/planningandbuilding/planning/sustainability/environmental/environmentalimpactassessment/noteenvironmental/>

Natural England agrees with the stages of Ecological Impact Assessment outlined in paragraph 10.3.4 and recommends that a source-pathway-receptor approach is applied to inform this process. Consideration should be given to both direct and indirect impacts upon designated features and supporting habitats. To assist with the assessment of this project, we recommend that a separate chapter providing specific information to support a Habitats Regulations Assessment is included within the Environmental Statement.

We note in paragraph 10.2.22 that in addition to the SPA and Ramsar sites, a number of suitable fields exist across the proposed cable route suitable to support roosting, loafing and foraging during high-tide. These sites, and additional sites in the vicinity of the landfall area, are identified within the Solent Wader and Brent Goose Strategy (SWBGS). This strategy aims to protect the network of non-designated terrestrial wader and brent goose sites that support the Solent Special Protection Areas (SPA) from land take and indirect effects associated with new development and forthcoming guidance on mitigation and offsetting requirements is being prepared. The terrestrial wader and brent goose sites are located on land that falls outside of the Solent SPAs boundaries. However, as this land is frequently used by SPA species (including qualifying features and assemblage species), it supports the functionality and integrity of the designated sites for these features.

Detailed consideration of these sites within the EIA is required with respect to land take and disturbance and we recommend that you seek further information from the [Hampshire Biodiversity Information Centre](#) and other appropriate bodies to supplement surveys. It is noted that detailed wintering bird surveys have been undertaken for the survey area of the landfall and cable route. Natural England would be happy to advise further on mitigation and offsetting requirements through our Discretionary Advice Service as the detailed design progresses.

For the purposes of the Habitats Regulations Assessment, Natural England advises that these areas of functionally-linked land, together with other habitats that provide a supporting role, are assessed in a manner consistent with designated supporting habitat.

### ***Protected species***

The scoping report sets out the protected species ecological surveys being undertaken as part of the EIA. The area in the vicinity of the Converter Station is sensitive with respect to Bechstein's bats and hazel dormouse. Detailed consideration of these issues within the EIA is required with mitigation strategies, as appropriate.

### ***Area of landfall - Vegetated Shingle at Eastney Beach – Portsmouth City Council***

Eastney Beach forms an extensive area of coastal vegetated shingle, which is designated at county level for its semi-natural coastal habitats and supporting species. Detailed consideration of this priority habitat is required. It is noted that design options for this site are being considered to avoid impacts on this sensitive habitats such directional drilling. We would welcome further consultation as the detailed design progresses.

It is noted that the EIA scoping report includes reference to the Eastney Beach Habitat Restoration and Management Plan Supplementary Planning Document 2014 adopted 2014. This document sets out restoration and management prescriptions for the vegetated shingle and we advise further consideration is given to these measures to secure biodiversity enhancements.

### ***Cable route - Denmead Meadows, East Hampshire***

One of the options for the proposed route of the cable is through Denmead Meadows, which has been identified for its nature conservation value. The field is currently designated at county level due to the numbers and rich diversity of plant species present and last year it was submitted to Natural England for consideration for designation as a Site of Special Scientific Interest. This process is on-going and detailed consideration of this site will be required. It is understood that the applicant is

exploring design options that would seek to avoid direct impacts to this area, either through directional drill methods or alternative routes. Natural England would welcome further consultation as the detailed design progresses to ensure impacts are avoided and enhancements secured.

### ***Biodiversity Mitigation, Compensation and Enhancement***

In order to secure appropriate biodiversity mitigation and enhancements Natural England recommends that the Environmental Statement is supported by a Biodiversity Mitigation and Enhancement Plan (BMEP). The BMEP should include measures for mitigating impacts on protected species and habitats and include biodiversity compensation measures for any residual biodiversity losses that cannot be fully mitigated on site. This might include the provision of offsite replacement habitats, or an agreed financial contribution for biodiversity enhancements elsewhere calculated using a Biodiversity Compensation Framework, Environment Bank, or similar mechanism.

In the recent 25 Year Environment Plan, the Government has committed to making sure the existing requirements for net gain for biodiversity in national planning policy are strengthened and the current trend of biodiversity loss is halted. This approach is likely to be supported by the forthcoming planning policy guidance. Currently most developments still result in biodiversity loss. Natural England therefore advises that each development reverse this trend and deliver net gains in biodiversity.

Natural England strongly recommends that this proposal achieves a net gain for biodiversity and we advise that a biodiversity metric is used that would be relevant to each local authority. This approach would ensure that your authority will have met its duties under Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 which states that 'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.'

Where residual biodiversity losses are considered unavoidable, Natural England recommends that further advice on these aspects is sought through our Discretionary Advice Service (DAS). Further information on the DAS service and how to apply can be found here:

<https://www.gov.uk/guidance/developers-get-environmental-advice-on-your-planning-proposals>

### **Noise and vibration**

Natural England advises that potential noise and vibration impacts on ecologically sensitive receptors are included within the EIA.

### **Landscape and visual effects**

The development site is adjacent to and within the setting of the South Downs National Park, which is also designated as an International Dark Skies Reserve. Natural England's particular interest is in people visiting / enjoying / experiencing the countryside and especially natural beauty / special qualities of the designated landscapes. This might include people using open access land, Natural Trails, the England Coast Path, promoted routes and other rights of way, as well as publicly accessible countryside and wildlife sites.

Consideration should be given to the direct and indirect effects upon this designated landscape and in particular the effect upon its purpose for designation within the environmental impact assessment, as well as the content of the relevant management plan for South Downs National Park. Detailed consideration of sequential effects should also be included and Natural England would also

recommend the inclusion of long distance views from within the National Park where people are affected, such as Old Winchester Hill.

Natural England would wish to see details of local landscape character areas mapped at a scale appropriate to the development site as well as any relevant management plans or strategies pertaining to the area. The EIA should include assessments of visual effects on the surrounding area and landscape together with any physical effects of the development, such as changes in topography. The European Landscape Convention places a duty on Local Planning Authorities to consider the impacts of landscape when exercising their functions.

Natural England supports the publication *Guidelines for Landscape and Visual Impact Assessment*, produced by the Landscape Institute and the Institute of Environmental Assessment and Management in 2013 (3rd edition). The methodology set out in this document is almost universally used for landscape and visual impact assessment.

In order to foster high quality development that respects, maintains, or enhances, local landscape character and distinctiveness, Natural England encourages all new development to consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting local design characteristics and, wherever possible, using local materials. The Environmental Impact Assessment process should detail the measures to be taken to ensure the building design will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.

### **Cumulative and in-combination effects**

A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

The ES should include an impact assessment to identify, describe and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment, (subject to available information):

- a. existing completed projects;
- b. approved but uncompleted projects;
- c. ongoing activities;
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Natural England would advise that the cumulative impacts section should also consider impacts on ecologically sensitive receptors such as designated sites, non-designated sites, priority habitats and species, protected species etc. In relation to point e, Natural England would advise that the Environmental Statement should also consider known forthcoming planning applications in close proximity to the development application, where there is potential impacts on key ecological interests.

For example, a scoping report has been submitted for the redevelopment of the Fraser Range site at Eastney, Portsmouth and a Coastal Defence scheme is being progressed for the Southsea frontage. All of these developments will potentially impact on the vegetated shingle in this area and further examination of this issue is necessary.



The landscape and visual assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. In this context Natural England advises that the cumulative impact assessment should include other proposals currently at Scoping stage. Due to the overlapping timescale of their progress through the planning system, cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries relating to the specific advice in this letter only please contact Rachel Jones on 07717 808691. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely

Rachel Jones  
Lead Advisor – Sustainable Development  
Dorset, Hampshire and Isle of Wight Team

**From:**Astill, Lorraine  
**Sent:**Wed, 14 Mar 2018 11:33:37 +0000  
**To:**Banting, Alan  
**Subject:**FW: consultation memo 18/00001/EIASCO  
**Attachments:**ufm9.pdf

Hi Alan

I have looked at the scoping document and it would appear that the cable is only to be routed through Portsmouth, therefore the scoping document has identified that the operational noise along the cable route is expected to be negligible and has been scoped out of the EIA.

The operation of the cable route will not generate any emissions to air when in use. Impacts to local air quality from construction emissions has also been scoped out of the EIA as the additional traffic generated is not expected to be above the indicative threshold presented in EPUL/IAQM guidance document.

With regards to this information, we wish to raise no objects or comments to this work being carried out.

Regards

Lorraine Astill

Environmental Health Enforcement Officer

Environmental Health

Portsmouth City Council

2<sup>nd</sup> Floor, Core 2

Civic Offices

Guildhall Square

Portsmouth

PO1 2AL

Tel: 023 92834829

[Lorraine.astill@portsmouthcc.gov.uk](mailto:Lorraine.astill@portsmouthcc.gov.uk)

**From:** Piper, Kimberley  
**Sent:** 28 February 2018 16:22  
**To:** Public Protection  
**Subject:** consultation memo 18/00001/EIASCO

Please find attached a consultation on a EIA scoping opinion for the AQUIND interconnector scheme

regards

Mrs Kimberley Piper

Development Management Business Lead

Directorate of Culture and City Development

Tel: 023 9284 1277

Email: [Kimberley.Piper@portsmouthcc.gov.uk](mailto:Kimberley.Piper@portsmouthcc.gov.uk)

(Monday, Wednesday, Thursday and Friday only)

**Subject:**FW: planning consultation EIA Scoping Opinion  
**Attachments:**ufm4.rtf

18/00001/EIASCO

**From:** THOMPSON, Martin (Colas Ltd) [<mailto:martin.thompson@colas.co.uk>]  
**Sent:** 26 March 2018 09:37  
**To:** Piper, Kimberley  
**Cc:** WILLETT, Fred (Colas Ltd); Love, Michelle; COOPER, Donna (Colas Ltd)  
**Subject:** FW: planning consultation EIA Scoping Opinion

Morning Kimberley

If these cable works go ahead then there will be a massive impact on the Highway Network in Portsmouth.

There will be restrictions on certain Roads at certain times of the year due to Major Events in Portsmouth, regular coordination meetings will have to be held between the contractor and Highways to discuss restriction times on traffic sensitive roads and there will also be Section 58 restrictions on certain roads.

Colas & PCC Highways will have to have pre start meetings well in advance of the works with the contractor who will be carrying these works out.

Regards

Martin



**Martin Thompson**  
**Network Supervisor**

**Colas Limited**

Office : +44 2392 310 900

Direct dial: +44 2392 310 950

Mobile: [REDACTED]

Visit our website: [www.colas.co.uk](http://www.colas.co.uk)

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**From:** MCDUFF, Andy (Colas Ltd)  
**Sent:** 23 March 2018 15:02  
**To:** THOMPSON, Martin (Colas Ltd) <[martin.thompson@colas.co.uk](mailto:martin.thompson@colas.co.uk)>  
**Subject:** FW: planning consultation EIA Scoping Opinion

Martin please discuss re Eastney Beach Esplanade

Thanks

Andy

**From:** Piper, Kimberley [<mailto:Kimberley.Piper@portsmouthcc.gov.uk>]  
**Sent:** 22 March 2018 11:07

**To:** MCDUFF, Andy (Colas Ltd) <[andy.mcduff@colas.co.uk](mailto:andy.mcduff@colas.co.uk)>  
**Subject:** planning consultation EIA Scoping Opinion

*Message sent from Internet with [kimberley.piper@portsmouthcc.gov.uk](mailto:kimberley.piper@portsmouthcc.gov.uk) as email address*

Hi Andy

Please accept my apologies that we didn't get this to you sooner. If possible could we have comments ASAP please

Many thanks

Mrs Kimberley Piper

Development Management Business Lead

Directorate of Culture and City Development

Tel: 023 9284 1277

Email: [Kimberley.Piper@portsmouthcc.gov.uk](mailto:Kimberley.Piper@portsmouthcc.gov.uk)

(Monday, Wednesday, Thursday and Friday only)

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# Marine Maritime Organisation

Comment Date: Mon 05 Mar 2018

Please be aware that any works within the Marine area require a licence from the Marine Management Organisation. It is down to the applicant themselves to take the necessary steps to ascertain whether their works will fall below the Mean High Water Line.

The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing European grants.

## Marine Licensing

Activities taking place below the mean high water mark may require a marine licence in accordance with the Marine and Coastal Access Act (MCAA) 2009. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in England and parts of Wales. The MMO is also the authority responsible for processing and determining harbour orders in England, and for some ports in Wales, and for granting consent under various local Acts and orders regarding harbours. A wildlife licence is also required for activities that that would affect a UK or European protected marine species.

## Marine Planning

As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas. On 2 April 2014 the East Inshore and Offshore marine plans were published, becoming a material consideration for public authorities with decision making functions. The East Inshore and East Offshore Marine Plans cover the coast and seas from Flamborough Head to Felixstowe. For further information on how to apply the East Inshore and Offshore Plans please visit our Marine Information System. The MMO is currently in the process of developing marine plans for the South Inshore and Offshore Plan Areas and has a requirement to develop plans for the remaining 7 marine plan areas by 2021.

Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. For marine and coastal areas where a marine plan is not currently in place, we advise local authorities to refer to the Marine Policy



Statement for guidance on any planning activity that includes a section of coastline or tidal river. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act and the UK Marine Policy Statement unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our online guidance and the Planning Advisory Service soundness self-assessment checklist.

#### Minerals and waste plans and local aggregate assessments

If you are consulting on a mineral/waste plan or local aggregate assessment, the MMO recommend reference to marine aggregates is included and reference to be made to the documents below:

- o The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK) construction industry.
- o The National Planning Policy Framework (NPPF) which sets out policies for national (England) construction minerals supply.
- o The Managed Aggregate Supply System (MASS) which includes specific references to the role of marine aggregates in the wider portfolio of supply.
- o The National and regional guidelines for aggregates provision in England 2005-2020 predict likely aggregate demand over this period including marine supply. The NPPF informed MASS guidance requires local mineral planning authorities to prepare Local Aggregate Assessments, these assessments have to consider the opportunities and constraints of all mineral supplies into their planning regions - including marine. This means that even land-locked counties, may have to consider the role that marine sourced supplies (delivered by rail or river) play - particularly where land based resources are becoming increasingly constrained.

If you require further guidance on the Marine Licencing process please follow the link <https://www.gov.uk/topic/planning-development/marine-licences>

Captain NA Jardine MNI  
Harbour Master/Manager

CC Braby ACMA, CGMA  
Treasurer to the Board

SP Kerr BA, LL.M Solicitor  
Clerk to the Board

My Ref LHB/LM/18b  
Yr Ref 18/00001/EIASCO  
Ask for Louise MacCallum  
Date 23/03/2018

Dear Mrs Piper

**Eastney Beach, Eastney Esplanade, Southsea**

**EIA Scoping on AQUIND Connector**

I refer to your letter dated 28<sup>th</sup> February 2018 and the detailed drawings viewed on the Portsmouth City Council website concerning the above planning application.

The Board's Planning Sub Committee has considered the EIA Scoping documentation displayed on Portsmouth City Council's website and believe it to cover the matters expected, in particular the potential for impacts upon the designated features within the Langstone Harbour SSSI, SPA, SAC and Ramsar Site. The Board looks forward to providing complete and detailed comments upon the planning application when it is submitted in full.

Yours Sincerely,



Louise MacCallum  
Environment Officer  
Langstone Harbour Board

FAO Mrs K Piper  
Portsmouth City Council  
Planning Services  
Civic Offices  
Guildhall Square  
PORTSMOUTH  
PO1 2AU



Historic England

SOUTH EAST OFFICE

Mr Alan Banting  
Portsmouth City Council - Planning Department  
Civic Offices  
Guildhall Square  
PORTSMOUTH  
PO1 2AU

Direct Dial: 01483 252015

Our ref: PL00329482

26 March 2018

Dear Mr Banting

**EASTNEY BEACH, EASTNEY ESPLANADE, SOUTHSEA  
REQUEST FOR EIA SCOPING - UK/FRANCE HVDC INTERCONNECTOR; LAND  
FALL AND CABLE ROUTING**

Thank you for contacting us on 28<sup>th</sup> February 2018 regarding an EIA scoping opinion in relation to the above site. We treat such requests as pre-application advice. On the basis of the latest information about the proposals, detailed below, I offer the following advice.

**Advice**

The proposal is for scoping to inform a decision regarding the location of landfall for cabling and onward routing of cabling. This is part of a larger scheme to include; HVDC subsea cables, land/sea transition joint, HVDC underground cables, and installation of supporting infrastructure (converter stations in the UK and France).

Development related to the wider project has the potential to impact upon both designated and undesignated heritage assets and their settings both within the boundary of the proposal areas and in the areas around the different sites. In line with the advice in the National Planning Policy Framework (NPPF), we would expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposed development of this area might have upon those elements which contribute to the significance of these assets.

We would expect the assessment to clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed. An arbitrary radial search is unlikely to accurately reflect the impact of the development on heritage assets in the wider area and a more tailored approach would be required, in particular with regards to assessing impacts to setting. Further guidance on setting can be found at our website (<https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf>). Version 4 of this document is currently under review.



EASTGATE COURT 195-205 HIGH STREET GUILDFORD SURREY GU1 3EH

Telephone 01483 252020  
HistoricEngland.org.uk





Historic England

## SOUTH EAST OFFICE

We would draw attention to the following scheduled monument which falls within the proposed potential landfall area of the project scheme.

Fort Cumberland (scheduled monument and Grade II\* listed building)

We would be particularly concerned regarding any cable landfall or development proposed within the scheduled area, or the areas in close proximity to the Fort. This is because there are surviving remains of both Fort Cumberland and the earlier Eastney Fort that remain both as upstanding structures and as buried archaeological deposits, both within and immediately outside the scheduled areas. We would expect that all options to choose a route that will not impact the Fort (either physically impact or impact it through development within its setting) will be explored. We also note the potential for future redevelopment of the Fraser Range brownfield site adjacent to Fort Cumberland, and suggest consideration of how these cable/landfall proposals could impact on any future development schemes.

We would also expect the Environmental Statement to consider the potential impacts on non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place. This information is available via the local authority Historic Environment Record ([www.heritagegateway.org.uk](http://www.heritagegateway.org.uk)) and relevant local authority staff.

We would strongly recommend that you involve your own conservation and archaeological staff at both Portsmouth City Council and Hampshire County Council in the development of this assessment. They are well placed to advise on: local historic environment issues and priorities; the nature and design of any required mitigation measures (as decided at a further stage in any project); and opportunities for securing wider benefits for the future conservation and management of heritage assets.

With regard to designated heritage assets there needs to be an understanding of what makes these assets 'special', Significance can be harmed or lost through alteration or destruction of the heritage asset, or through development within its setting, so it needs to be demonstrated how these proposals would impact on significance.

The assessment should also take account of the potential impact which associated development activities (such as construction, servicing, and maintenance) might have upon perceptions, understanding, and appreciation of any heritage assets in the area. The assessment should also consider the likelihood of alterations to drainage and ground water patterns that might lead to in situ decomposition or destruction of below ground archaeological remains and deposits, and can also lead to subsidence of buildings and monuments.



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Telephone 01483 252020  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)





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SOUTH EAST OFFICE

Where the cable routes follow existing roads/routes/developed land, the impacts to heritage assets are likely to be much lower than where new development occurs.

We would be pleased to provide further advice in due course on the proposals, particularly in relation to development that might affect Fort Cumberland or any other identified designated heritage assets. We think it likely that for much of the cable route, it will be local and regional conservation/archaeological staff that will lead on advice, in particular in relation to impacts on undesignated heritage assets and potential for archaeological impacts.

**Recommendation**

We urge you to address the above issues, and recommend that production of an Environmental Statement should continue in accordance with national and local policy guidance, and following your expert conservation advice. If you have any queries about any of the above, or would like to discuss anything further, please contact me for further advice.

Yours sincerely,



Rebecca Lambert  
Inspector of Ancient Monuments  
rebecca.lambert@HistoricEngland.org.uk

**List of information on which the above advice is based**

Request for scoping opinion from Portsmouth Borough Council dated 28th February 2018

Scoping Report for Environmental Impact Assessment; UK-France HVDC Interconnector [produced by Aquind February 2018]



EASTGATE COURT 195-205 HIGH STREET GUILDFORD SURREY GU1 3EH

Telephone 01483 252020  
HistoricEngland.org.uk



## Highways Engineer

Comment Date: Thu 05 Apr 2018

Following review of the scoping document submitted outlining the suggested approach for producing the Environmental Impact Assessment the following comments are made.

The proposed cable routing travels through the administrative boundaries of Portsmouth City Council, Havant Borough Council, Winchester City Council and East Hampshire District Council respectively; these comments refer only to the highway network under the control of Portsmouth City Council. The converter station required to terminate the cable is to be located near Lovedean and therefore this part of the scheme will not be considered by Portsmouth City Council.

Once the cable has been laid, the LHA would not expect there to be any associated traffic generation except for any routine investigation/maintenance required. The LHA is content therefore that the transport-related component of the Environmental Statement (ES) is limited to the construction phase in terms of the Portsmouth road network.

Significant impacts will be experienced by all road users along the routing of the cable during construction. The roads proposed to form the cable route through Portsmouth are mostly classified roads and form the Eastern corridor linking the eastern areas of Portsmouth to the national strategic network. It is expected that motorised users of the affected roads and non-motorised users including pedestrians & cyclists will be significantly affected. A desk-top study is to be carried out to assess the routes that will be affected with the likely impacts identified within the ES. This should consider the re-provision of any walking/cycle routes that are disrupted in addition to the likely disruption to motor vehicles.

A detailed Construction Traffic Management Plan will be required. Presuming that the works will occur in phases, a tailored CTMP should be produced for each phase detailing the Traffic Management requirements and proposals to manage traffic effectively and how it is proposed that delays will be reduced. Details of consultation carried out with residents should also be included, the extent of which should be agreed with the LHA. A full set of Traffic Management drawings will be required as part of the CTMP which will be agreed by the LHA.

The location of any compounds required for each phase of works should be identified as well as the likely delivery routings and expected arrival windows. The ES should establish the amount of staff/operatives that will be working on site at any time and identify how they will arrive to site and determine if parking provision is required and how/where this could be accommodated. Any opportunities for encouraging sustainable transport modes and/or reducing the amount of vehicles on the highway associated with the works should be explored.

## Hants & IOW Wildlife Trust

Comment Date: Thu 05 Apr 2018

The Wildlife Trust's concerns with proposals in the PCC area all relate to the potential for significant effects on ecology and are summarised as follows:

1. The proposals are located within close proximity to the Chichester and Langstone Harbours Ramsar, SPA, the Solent Maritime SAC and the proposed Solent SPA, as such there is the potential for significant adverse effects to occur. Avoidance measures will need to be put in place to ensure that the integrity of these sites is not adversely impacted. Such measures may include avoiding works during the sensitive over-wintering period, noise abatement measures and avoiding sensitive SAC features.

2. Eastney Beach forms an extensive area of coastal vegetated shingle, which is designated at county level for its semi-natural coastal habitats and supporting species.

3. Eastney beach is also included in the Solent Wader and Brent Goose Strategy as a secondary support area and is used by over-wintering waders as a roost site and occasionally by Brent geese. This site is located outside of the boundary of the coastal SPA, but is evidently functionally linked to it.

4. There are also historic records of the common ringed plover *Charadrius hiaticula* nesting on Eastney Beach during the summer months; this species has declined dramatically in recent years due to trampling and disturbance during the nesting season. In the UK it is now included on the Red List of Birds of Conservation Concern<sup>1</sup>.

5. National Planning Policy requires proposals to deliver no net loss in biodiversity and net gains, where possible; in addition the Natural Environment and Rural Communities (NERC) Act 2006 (section 40) requires a public authority, in exercising its functions, to conserve biodiversity. Furthermore, the Government has identified the need to deliver environmental net gain through the planning system in their 25 Year Environmental Plan, if the decline in biodiversity is to be stopped. In order for these development proposals to deliver net gains in biodiversity, it would need to be demonstrated that they will not impact biodiversity both within the development footprint and the wider countryside. It will therefore be essential that detailed ecological information is provided in order that sensitive habitats can be avoided, and where that is not possible robust mitigation measures proposed, or compensation, where required.

6. Recent studies have shown a dramatic decline in biodiversity and that in order to reverse these declines better methods of accounting, mitigating and compensating human impacts on biodiversity are required. To simply aim for a 'no net loss' through the planning system is no longer acceptable and, will not stop the decline, as such all development proposals should seek to deliver 'net gains' in biodiversity. Many local authorities are now using a metric to evaluate the loss and gain of biodiversity and to assess avoidance, mitigation and, where necessary, compensation measures.

Therefore if the council is to make a transparent and auditable account of biodiversity on the site, we strongly recommend the use of the biodiversity metric. This will help ensure the council delivers its obligations under the NERC Act, achieve robust assessments of impacts, design effective mitigation or, if required compensation, and provide true net gains in biodiversity.





Portsmouth City Council  
Planning Services  
Civic Offices Guildhall Square  
Portsmouth  
Hampshire  
PO1 2AU

**Our ref:** HA/2018/120224/01-L01  
**Your ref:** 18/00001/EIASCO  
**Date:** 21 March 2018

Dear Sir/Madam

### **EIA scoping on Aquind interconnector**

#### **Eastney Beach, Eastney Esplanade, Southsea**

Thank you for consulting the Environment Agency on the above application.

### **Environment Agency Position**

#### Groundwater

The following comments relate to the section of the works proposed in Portsmouth City Councils area only and not to the entire works.

We are pleased to see that Water Resources (chapter 12) and Ground Conditions (chapter 13) have been scoped in to the EIA.

The scoping document contains very limited information on the design or use of hazardous substances or non-hazardous pollutants in the scheme (for example fuels and chemicals used in cables ). The EIA should include this information, provide an assessment of risks associated with the use and storage of these substances to groundwater and discuss how the risks to groundwater can be mitigated.

Chapter 12 does not specifically identify the need to discuss the potential for pollution from the proposed development in the EIA. This, along with the mitigation measures needed will need to be included.

The scoping report confirms that 'a detailed review of potential sources of contamination will be completed in the preliminary risk assessment'. We agree that this will be needed. The cables we go through a number of historical landfill sites. We recommend that the developer contacts the Environmental Health Officer at Portsmouth City Council to obtain further information on these.

A conceptual site model should be developed and included in the EIA document. Further information is available on the GOV.UK website.

Environment Agency  
Canal Walk, ROMSEY, Hampshire, SO51 7LP.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

Cont/d..

### Flood Risk

The proposed cable route through Portsmouth passes along sections of the North Portsea coastal defence scheme, which is being delivered by the East Solent Coastal Partnership (ESCP).

The EIA Scoping Report identifies that the proposed works will pass by phase 1 of this scheme (planning application 14/01387/FUL in Table 3.7) but does not identify the future phases of the scheme. The future phases of the scheme can be seen at <http://www.escp.org.uk/coastal-schemes/portsmouth/protecting-future-north-portsea-island>.

The EIA Scoping Report should be updated to include the future phases and, if they have not already been, the ESCP should be consulted.

### Fisheries and Biodiversity

We note from the report that the cable route may cross an 'unnamed watercourse' north of the B2150. We believe this water course to be the North Purbrook Stream, classified as a statutory watercourse. This watercourse is a known eel migratory route and is likely to have a resident fish population.

Currently the Scoping Report does not include potential effects on fish (including eels). The noise and vibration from HDD drilling activities in close proximity to a watercourse has the potential for adverse impact on these fish species as well as other aquatic ecology such as water voles and otters. Therefore, this needs to be included in the EIA scoping report.

There are other watercourses close to the cable route including Soake Farm, the Wallington and Hermitage statutory main rivers. It is unclear from the maps provided whether these watercourses and their ecology could be impacted by the proposed cable route. Clarification needs to be given on how close the proposed route is to these watercourses whether the cable route will impact ecology of these rivers also.

### Marine Water Quality and Water Framework Directive

We understand from the document that this EIA Scoping Report only covers the 'UK onshore aspects of the Project, which include; the HVDC converter station, landfall works, High Voltage Alternating Current (HVAC) underground cables and the HVDC underground cables and fibre optic data transmission cables in the UK (the 'Proposed Development')'. We also note that 'A separate EIA Scoping Report for the UK marine elements of the Project will be submitted to the Marine Management Organisation (MMO) under the Marine Works (Environmental Impact Assessment) (Amendment) Regulations 2017'.

There is no chapter outlining potential effects of the proposed scheme on marine water quality, yet elements of the landfall are likely to fall within the marine realm. All activities below Mean High Water Springs (MHWS) require an assessment of Water Framework Directive (WFD) compliance.

It is unclear from the application whether this Scoping Report covers any works below MHWS. If such works are included, a WFD assessment is required as part of the EIA. For guidance, please refer to the section 'WFD Assessment' below. Our understanding is, however, that all works below MHWS will be considered separately as part of the Marine Licence application to the MMO, in which case an assessment of water quality impacts and WFD compliance will only be required then.

### WFD Assessment

A WFD assessment will be required for all elements of the works that fall within, or have the potential to affect, a WFD water body and any of the protected areas therein (including Bathing Waters and Shellfish Waters).

There are Bathing Waters and Shellfish Waters around the area of landfall. Any sediment disturbances that lead to increases in suspended solids in the water column could potentially affect compliance with the WFD. Suitable evidence of no likely impact will be required for any marine works. Hence, marine water quality and a WFD assessment should be included as a chapter in the report.

The WFD assessment should follow the 'Clearing the Waters for All' guidance, which has been published on <https://www.gov.uk/guidance/water-framework-directive-assessment-estuarine-and-coastal-waters>.

A WFD Assessment should comprise either:

- an explanation of why the activity has been screened out; or
- an explanation of why all elements have been scoped out, ideally using the scoping template; or
- an impact assessment.

The size and scale of the WFD Assessment should be proportional to the risk posed by the potential works, but the applicant must demonstrate that they have assessed the risks and provided mitigation where necessary.

Should you have any further queries please do not hesitate to contact me on the number below.

Yours faithfully

**Mrs Charlotte Lines**  
**Senior Planning Advisor**

Direct dial 02084745838

Direct e-mail [PlanningSSD@environment-agency.gov.uk](mailto:PlanningSSD@environment-agency.gov.uk)

cc WSP



# Memo

To: Kimberley Piper  
From: Adam Eggesfield  
Ref: 18/00001/EIASCO  
Date: 15<sup>th</sup> March 2018

## Message

Dear Kimberley

Thank you for consulting us.

I have reviewed the submitted EIA Scoping Report (AQUIND Limited, February 2018) and would make the following comments, which are only related to areas of the project that take place in Portsmouth.

### **Air Quality**

The Air Quality section identifies that the assessment will include any sensitive ecological receptors within 50m of the site boundary and construction routes. This distance would be likely to capture the key nearby SPA / SAC / SSSI at Langstone Harbour, which is very close to the site for part of its route. However a recent Natural England report '*Potential risk of impacts of nitrogen oxides from road traffic on designated nature conservation sites*' identified that

*"Although there were many gaps in knowledge, the literature provided evidence that vegetation was being impacted by exposure to motor vehicle pollution at distances of up to 200m from roads and that there was potential for this distance to be greater."*

Therefore I would suggest that the applicant considers extending the distance that air quality impacts on ecologically-sensitive receptors are captured by the assessment.

### **Noise and Vibration**

The Noise and Vibration section doesn't appear to consider ecological receptors (and noise / vibration impacts are not specifically highlighted in the Ecology section). One of the key vulnerabilities to the nearby SPAs is disturbance to qualifying overwintering bird populations. While this is an urban area and the birds will be habituated to some extent to higher background noise levels, construction activity can add a different level of higher 'impact-type' noise, which can result in disturbance effects.

I would therefore advise that ecological receptors are included in the noise assessment work.

## **Ecology**

The Scoping Report identifies that the relevant LPAs will need to satisfy themselves, through the Habitats Regulations Assessment process, that the development will not have a likely significant effect on European sites.

While the report does include all the sites within a 10km radius in Table 10.2, paragraph 10.2.1 only appears to consider the sites immediately adjacent to the route and does not include Portsmouth Harbour. It is important to consider the way the relevant bird populations use the landscape, for example, flocks of brent geese will move between SPAs. I would therefore recommend that impacts to Portsmouth Harbour SPA are also given proper consideration due to the likelihood that birds seen on Langstone Harbour may well also use Portsmouth Harbour.

The Scoping Report correctly notes that fields outside the SPAs are also used by the relevant bird populations as 'supporting habitat'. For the avoidance of doubt, there are also other areas / habitats that are not strictly 'fields' that are used and care should be taken to ensure these are not discounted. For example, areas of shingle and sea defences outside SPA boundaries can support important high-tide wader roosts.

Information relating to the European sites should also include the relevant work carried out in relation to Air Quality and Noise / Vibration discussed above.

The scoping report identifies that landfall will take place adjacent to and across Eastney Beach SINC. It therefore appears inevitable that the landfall will have an adverse impact on the SINC. Eastney Beach is an important area of vegetated shingle habitat and sensitive to adverse impacts. The SINC is also an area that supports SPA birds during the winter, and impacts to this would need to be considered.

I would also strongly advise that a full justification is given for the selection of this location for this element of the scheme – for example, why could the landfall not be a short distance to the west, where there is less ecological sensitivity? Indeed, the beach is narrower to the west of the SINC and has less of a shingle ridge, which may make construction easier.

The scope of the general protected and notable species work appears generally sound and I would make no specific comments on this.

Please do contact me if you need any further information.

Please note that this advice is given in accordance with the Service Level Agreement that has been signed between Hampshire County Council and your Council. The comments within this letter are expressed as a professional view provided to Portsmouth City Council and should not, therefore, be interpreted as those of Hampshire County Council.

Regards

Adam

Adam Eggesfield  
*Senior Ecologist*  
*Hampshire County Council*

## Contaminated Land Team

Comment Date: Thu 05 Apr 2018

The Contaminated Land Team (CLT) has reviewed the above application together with the following EIA scoping report:

\* UK - France HVDC Interconnector, Scoping Report for Environmental Impact Assessment, AQUIND Ltd., Ref: 11/45994228\_1, 20 February 2018.

With regard to human health risks and land contamination, Section 13 of the report discusses ground conditions. Section 13.1.19 states that a detailed review of potential sources of contamination will be completed in the preliminary risk assessment. Section 13.2.4 - 13.2.7 looks specifically at land contamination and identifies the need for a desk study report and subsequent site investigation where required. In this regard the CLT agree that full desk study and preliminary risk assessments will need to be carried out for the full length of the proposed cable installation, and must include the review of information held by the CLT.

Requests should be made to the CLT for our Land Use Enquiry Service in order to ensure any desk study research carried out does not omit vital information relating to potentially contaminative uses or previous site investigation data held by PCC. When looking at the baseline conditions of the proposed cable route (13.1) the CLT recommend that 'the study zone' plus a buffer zone of 50m is reviewed in relation to information held on our GIS, with a buffer zone of 250m for landfill only. This is opposed to the 250m buffer discussed in 13.1.2 which would be too large for our Land Use Enquiry service given the degree of information held by the CLT.

With regard to controlled waters risk, the Environment Agency should be consulted and the CLT copied in on any comments.

## Archaeology Advisor

Comment Date: Mon 05 Mar 2018

The proposed route of the cable crosses an mainly urban landscape but one with some archaeological potential. With this in mind attention is drawn to the EIA Scoping Report which is included among the documentation attached to the above application on your website. Chapter 9 of this Scoping Report addresses the topic of Historic Environment and Archaeology and it is pleasing to see that this chapter commits the developer to producing an archaeological Desk-Based Assessment (DBA) that should address the below ground archaeological issues along the cable route. This DBA should set out the nature of the archaeological potential of the site and the impact of any proposals on that archaeological potential as well as a mitigation strategy (which is also anticipated by the Scoping Report) to satisfy the planning authority that all archaeological issues will be sustainably dealt with during development under the terms of NPPF. According to the Scoping Report the DBA will also form the basis of a Historic Environment and Archaeology chapter in the forthcoming Environmental impact Assessment (EIA) that will accompany a future planning application. This plan of action is endorsed.