



AQUIND Limited

AQUIND INTERCONNECTOR

Statement of Common Ground Between
AQUIND Limited and Historic England

The Planning Act 2008

Document Ref: 7.5.13

PINS Ref.: EN020022

AQUIND Limited

AQUIND INTERCONNECTOR

PINS REF.: EN020022

DOCUMENT: STATEMENT OF COMMON GROUND

DATE: NOVEMBER 2020

DOCUMENT

Document	Statement of Common Ground with Historic England
Revision	003
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Prepared By	Jack Smith/Sarah Lister, Natural Power
Date	26/11/2020
Approved By	Jon Chandler, WSP/Ross Hodson, Natural Power
Date	26/11/2020

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1. INTRODUCTION AND PURPOSE

1.1. PURPOSE OF THE STATEMENT OF COMMON GROUND

- 1.1.1.1. This Statement of Common Ground ('SoCG') has been prepared with the Historic Buildings and Monuments Commission for England (known as Historic England) to show where agreement has been reached with AQUIND Limited during the pre and post Development Consent Order ('DCO') application consultation and in the course of the DCO Examination.
- 1.1.1.2. This SoCG has been prepared by AQUIND Limited in consultation with Historic England in respect of the Development, collectively referred to in this SoCG as 'the parties'.
- 1.1.1.3. The purpose and possible content of SoCGs is set out in paragraphs 58-65 of the Department for Communities and Local Government's guidance entitled "Planning Act 2008: examination of applications for development consent" (26 March 2015). Paragraph 58 of that guidance explains the basic function of SoCGs:
- "A statement of common ground is a written statement prepared jointly by the applicant and another party or parties, setting out any matters on which they agree. As well as identifying matters which are not in real dispute, it is also useful if a statement identifies those areas where agreement has not been reached. The statement should include references to show where those matters are dealt with in the written representations or other documentary evidence."
- 1.1.1.4. This SoCG comprises a record of agreement which has been structured to reflect topics of interest to Historic England on the AQUIND Interconnector DCO Application (the Application). Topic specific matters agreed, not agreed and actions to resolve or on-going between Historic England and AQUIND Ltd are included.
- 1.1.1.5. The position with respect to each topic of interest is presented in a tabular form with Red, Amber and Green cells depicting matters Not Agreed, On-going or Agreed respectively.
- 1.1.1.6. This revision of the SoCG is an update to the revision submitted at Deadline 4 and has incorporated amendments provided by Historic England. It should be noted that Historic England are still reviewing the Applicant's Response to Written Representations (REP2-014) and will respond to the Applicant more fully in due course. Both parties agree that the document broadly reflects the current status of consultation on matters at this time.

1.2. DESCRIPTION OF THE PROPOSED DEVELOPMENT

1.2.1.1. AQUIND Limited (“the Applicant”) submitted an application for the AQUIND Interconnector Order (the 'Order') pursuant to Section 37 of the Planning Act 2008 (as amended) (the “PA2008”) to the Secretary of State on 14 November 2019 (the 'Application').

1.2.1.2. The Application seeks development consent for those elements of the AQUIND Interconnector (the 'Project') located in the UK and the UK Marine Area (the 'Proposed Development').

1.2.1.3. The Project is a new 2,000 MW subsea and underground High Voltage Direct Current ('HVDC') bi-directional electric power transmission link between the South Coast of England and Normandy in France. By linking the British and French electric power grids it will make energy markets more efficient, improve security of supply and enable greater flexibility as power grids evolve to adapt to different sources of renewable energy and changes in demand trends such as the development of electric vehicles. The Project will have the capacity to transmit up to 16,000,000 MWh of electricity per annum, which equates to approximately 5% and 3% of the total consumption of the UK and France respectively.

1.2.1.4. The Proposed Development includes:

- HVDC marine cables from the boundary of the UK exclusive economic zone to the UK at Eastney in Portsmouth;
- Jointing of the HVDC marine cables and HVDC onshore cables;
- HVDC onshore cables;
- A Converter Station and associated electrical and telecommunications infrastructure;
- High Voltage Alternating Current ('HVAC') onshore cables and associated infrastructure connecting the Converter Station to the Great Britain electrical transmission network, the National Grid, at Lovedean Substation; and
- Smaller diameter fibre optic cables to be installed together with the HVDC and HVAC cables and associated infrastructure.

2. CONSULTATION

2.1.1.1. A timeline summary of the correspondence between the parties is set out in Table 2.1 below.

Table 2.1 – Consultation on Onshore Cultural Heritage and Archaeology and Marine Archaeology

Date	Form	Summary of contact
25 April 2018	Letter received via email	Environmental Impact Assessment ('EIA') Scoping Opinion response from Historic England, following receipt of consultation request from and the Marine Management Organisation (dated 26 March 2018).
28 November 2018	letter received via email	EIA Scoping Opinion response from Historic England to Planning Inspectorate (consultation letter dated 31 October 2018).
29 April 2019	letter received via email	Preliminary Environmental Information Report ('PEIR') Scoping Advice received from Historic England following receipt of PEIR documentation dated 25 February 2019.
01 July 2019	Email	Draft Deemed Marine Licence ('DML') shared with Historic England for review.
17 July 2019	Email Correspondence	Informal consultation prior to PEIR response. concerning Order Limits extent at the Landfall. The nature of the proposals within the vicinity of Fort Cumberland Scheduled Monument were clarified and it was demonstrated that no disturbance would occur within the Scheduled Monument Constraint Area. It was confirmed that the subsequent iteration of the Order Limits would omit this area.
24 July 2019	Letter received via Email	Historic England feedback on draft DML received (Appendix 1).
2 August 2019	Email	The Applicant's responses to comments received from Historic England on the PEIR (Appendix 2).
27 August 2019	Letter received via Email	Historic England response to marine briefing note received (Appendix 3).
05 September	Email	Draft outline Marine Written Scheme of Investigation ('WSI') (Report Ref: 116960.1 September 2019)

Date	Form	Summary of contact
2019		supplied to Historic England for review and comment.
24 September 2019	Email	Historic England response to draft outline WSI received (Appendix 4).
17 February 2020	Relevant Representations	Historic England submission of Relevant Representation to the Planning Inspectorate to take part in the examination of the submitted Development Consent Order application (Appendix 5).
10 March 2020	Email	Draft marine SoCG shared with Historic England for review.
16 March 2020	Teleconference	Discussions on draft marine SoCG and examination.
01 April 2020	Telecon Meeting (WSP and HE).	Meeting to discuss the onshore heritage aspects raised in Historic England's relevant representation (WSP meeting minutes 04-06-20).
07 April 2020	Email	WSP provided meeting minutes following teleconference, for Historic England comment (WSP 04-06-20)
07 April 2020	Email	Historic England approved minutes and confirmed that photographs from the western ravelin of Fort Cumberland were not currently available. It was agreed that a further visualisation using existing viewpoints would be useful.
08 April 2020	Email	WSP confirmed that an additional visualisation could be produced following internal discussions to agree scope.
14 April 2020	Email	Updated draft marine SOCG shared with Historic England for second review, along with minutes of teleconference (16 March 2020) and additional information.
21, 22 April 2020	Email	Historic England clarified approach to merged onshore and marine SoCG. WSP agreed that documents would be merged for submission.
28 April	Email	WSP provided detail of the proposed further

Date	Form	Summary of contact
2020		visualisation (1x Level 2 Wireline using existing landscape Viewpoint 22).
29 April 2020	Email	Historic England requested further clarification of visualisation proposal and timescales for completion.
01 May 2020	Email	WSP provided example of Level 2 wireline visualisation. It was confirmed that visualisation would be produced for submission at Deadline 1.
26 May 2020	Email	WSP provided update on progress of visualisation. Historic England requested that any updated design elements of the Optical Regeneration Station (ORS) be provided alongside the visualisation.
08 July 2020	Email	Historic England requested update on progress of visualisation, following publication of the Rule 6 letter and Examining Authority Written questions.
09 July 2020	Email	WSP provided an update on progress of the visualisation. It was clarified that the final appearance of the ORS buildings (including materials/colour) would be determined post consent with the submission of a detailed design within the defined parameters plan, which would be subject to local authority consents.
21 July 2020	Email	Merged onshore and marine SoCG issued to Historic England for review.
21 August 2020	Email	WSP provided detail of increased visualisation scope (comprising 4 separate wirelines, rather than the single block parameter), for Historic England comment.
24 August, 01, 04 September	Email	Various correspondence confirming next steps and timescales for delivery of visualisation.
28 September 2020	Email	Historic England provided photos showing view from the western ravelin of Fort Cumberland, via email.
6 October 2020	Submission to the Examination	Written Representation submitted by Historic England to the Planning Inspectorate.

Date	Form	Summary of contact
	Authority	
20 October 2020	Applicant's response to HE Written Representation	REP2-014 submitted by Applicant at Deadline 2 of Examination
26 October 2020	Teleconference	A teleconference was held with Historic England to discuss the additional visualisation (document reference 7.8.1.10) and ES Addendum provided at Deadline 1 (REP1-139).
6 November 2020	Email	Updated SoCG issued to Historic England for comment, following discussions in relation to onshore elements, prior to submission at Deadline 4.
16 November 2020	Email	Updated SoCG provided to the Applicant with Historic England comments and amendments. Further feedback to REP2-014 from Historic England is forthcoming.

2.2. BASIS OF AGREEMENTS

- 2.2.1.1. A summary of the matters discussed, including the written responses to Historic England comments on EIA Scoping and PEIR consultation are included in Table 3.1 along with how and where any concerns were addressed in the Environmental Statement (ES) (as set out in Table 3 in Appendix 21.1, *Consultation Responses, Examination Library Reference AP-441*).
- 2.2.1.2. Table 3.1 and 3.2 presents negotiation to date during consultations on onshore and marine aspects of the Proposed Development and also includes ongoing discussions following submission of the ES.

2.3. SUMMARY OF TOPICS COVERED BY THE STATEMENT OF COMMON GROUND

- 2.3.1.1. The following topics discussed between the parties are commented further in this SoCG:
- Scope of onshore and marine EIA assessment and identification of assets.
 - The impact assessment in relation to Fort Cumberland Scheduled Monument, specifically in relation to the proposed ORS building(s) at the Landfall.

- Marine Archaeology.
- Outline Marine Written Scheme of Investigation ('WSI').
- Deemed Marine Licence ('DML').

3. CURRENT POSITION

3.1. ONSHORE HERITAGE AND ARCHAEOLOGY

Table 3.1 - Onshore Cultural Heritage and Archaeology

Ref.	Description of matter	Details of Agreement	RAG
Onshore Heritage and Archaeology			
3.1.1	Baseline	<p>Conservation Areas are clearly identified along the Order Limits and assessed where appropriate in section 21.5 of Chapter 21 (Heritage & Archaeology) of the Environmental Statement (ES) (APP-136).</p> <p>It is also agreed that the assessment of setting related impacts along the proposed cable corridor have been scoped out of ES on the basis that the cable corridor is below ground and the possible impact on the setting of Designated Heritage Assets from temporary works during installation is insignificant. (Response as provided in Table 3 of Appendix 21.1 of the Environmental Statement (Consultation Responses, Examination Library Reference APP-441)).</p> <p>Conservation Areas should be identified along the Cable Route. This was addressed in Chapter 21 (Heritage & Archaeology) of the Environmental Statement (APP-136) with Conservation Areas along the cable route clearly identified and assessed where appropriate.</p>	Agreed
3.1.2	Assessment Methodology	<p>It is agreed that section 21.4 of Chapter 21 of the ES (Heritage and Archaeology) (APP-136) clearly outlines the approach to creating the baseline and assessing impacts of the development in line with advice from Historic England identified in Table 2 of Appendix 21.2 of the ES (APP-350). It is agreed that listed buildings and scheduled monuments have been adequately identified in this chapter and its supporting documents.</p>	Agreed

Ref.	Description of matter	Details of Agreement	RAG
3.1.3	Landfall – Fort Cumberland Archaeology	It is agreed that no disturbance would occur within the Fort Cumberland Scheduled Monument Constraints Area and there would be no physical impact to the asset. Potential impact to below ground remains outside of the Scheduled Monument within the Order Limits will be addressed by a programme of archaeological investigation/mitigation, agreed by the Local Planning Authority Archaeological Advisor.	Agreed
3.1.4	Landfall – Fort Cumberland, Setting (1)	<p>It is agreed between the parties that the proposed Optical Regeneration Station (ORS) would not result in substantial harm to Fort Cumberland Scheduled Monument and Grade II* listed building, in relation to changes to historic setting (Historic England, <i>Deadline 1 Submission – Written Representation and Response to first written questions</i>).</p> <p>Further discussion surrounding the level of harm as assessed in ES Chapter 21 (Heritage and Archaeology) have been undertaken and the outcome of these discussions is outlined in Section 3.1.6 below.</p>	Agreed
3.1.5	Landfall - Fort Cumberland, Setting (Level of Harm) (2)	<p>AQUIND position:</p> <p>The Applicant considers the impact to the significance of Fort Cumberland is negligible in respect of views from the western ravelin, based on the distance from the asset and the presence of a modern residential housing estate, located 15m to the north-west of the proposed ORS compound. The site of the proposed ORS compound is currently in use as a car park. The Applicant considers that the landward view from the western ravelin has been substantially altered since the construction of a 1960s housing estate (located 15m north of the Proposed Development) and 20th century motor shed adjacent to the north. The surrounding housing estate, trees and parked cars have significantly impacted the open coastal plain in views looking out from the western ravelin towards the Landfall and Fort Cumberland Road, including what were lines of fire from the fort. The location of the proposed ORS compound would introduce a new built form in long views out from the western ravelin towards Fort Cumberland Road. However, the proposed ORS would be lower in height than the current housing estate, and when seen against the background of the surrounding residential development would not be visually intrusive. Taken overall, the ORS would not have a significant impact on how the asset is appreciated and</p>	Not agreed

Ref.	Description of matter	Details of Agreement	RAG
		<p>understood. The overall environmental effect is therefore considered negligible.</p> <p>Following submission of the DCO application, It was agreed that an adjacent viewpoint would be used to provide further assurance that the significance of the fort would be unaffected, as access at the time was not possible due to Covid-19 restrictions. Landscape Viewpoint 22 was used to create photomontages showing the scale and massing of the two proposed ORS placement options (illustrated in Figure 15.56 of the Environmental Statement) (APP-289).</p> <p>An additional visualisation as agreed by Historic England was presented at Deadline 1 (Environmental Statement Addendum – Appendix 10 - Figure 5 Historic England Visualisations (REP1-141)). Although the Applicant acknowledges that the ORS would be visible in views from the western ravelin from Fort Cumberland, the overall effect as assessed in ES Chapter 21 (Heritage and Archaeology) (APP-136) remains negligible and as such the visualisation supports the conclusion of the settings assessment in ES Chapter 21 (Heritage and Archaeology) (APP-136).</p> <p>Historic England's position:</p> <p>With regard to Fort Cumberland, Historic England consider there to be a level of harm, equating to less than substantial, which is higher than that suggested by the Environmental Statement. HE consider that the siting and scale of the ORS could cause some harm to the view from the western ravelin at Fort Cumberland towards Fort Cumberland Road. Historic England do not agree with how the level of harm has been identified in consideration of the particular relationship that exists between Fort Cumberland, its field of fire and, in particular, the visual association between the ravelin and the approach road from Portsmouth.</p> <p>Historic England note that sightlines, fields of fire, and connectivity with land and sea based approaches, are integral to the significance of the fort. Relationships with other fortifications alongside primary approach routes and attacking points confer additional context and coherence which also contributes strongly to Fort Cumberland's significance. Historic England acknowledge that the setting of the fort was altered significantly during the mid-late 20th century, through residential development in the wider surrounding area. Despite this it is still possible to view, appreciate and understand the landward approach to the site, via Fort Cumberland Road in</p>	

Ref.	Description of matter	Details of Agreement	RAG
		<p>particular, and its relationship with the monument. Historic England request to see the line of sight maintained to maximum extent, through the redesign or repositioning of the ORS.</p> <p>Outcome of further discussions</p> <p>This matter has been subject to further discussion between the parties following submission of the further visualisations contained with the ES Addendum at Deadline 1 (Document Ref 7.8.1). A teleconference meeting was held on 26 October 2020, where the additional submissions were discussed.</p> <p>Based on the additional information provided Historic England do not agree that the level of harm remains negligible and consider the impact to Fort Cumberland as ‘less than substantial harm’ (Overarching National Policy Statement EN-1 terminology). Historic England note that the visualisations do not provide an accurate representation of the view from the western ravelin itself, which is at an elevated position. As such, there is a possibility that the road convergence would be visible over the buildings from the ravelin, but this cannot be confirmed without a viewpoint from the ravelin itself. Historic England consider that the visualisations indicate (combined with viewpoint photos from the ravelin) that there would still be an impact on the view of Fort Cumberland Road even from the higher point.</p> <p>It has been agreed between the parties that the proposed Optical Regeneration Station (ORS) would not result in substantial harm to the Fort Cumberland Scheduled Monument and Grade II* listed building (see 3.1.5). Historic England maintain that the level of harm is less than substantial whilst the applicant considers the overall effect to Fort Cumberland scheduled monument is negligible. Irrespective of this differing professional opinion, in EIA terms the proposed change would not constitute a ‘significant’ environmental effect warranting substantial design amendments to the proposed scheme.</p> <p>The applicant will continue to consult with Historic England regarding reserved matters relating to building design such as materials and palette but do not consider further assessment work necessary. As outlined in Section 5.8 in (EN-1) it will be for the examining authority to decide whether any perceived harm has clear justification, in order to weigh that perceived harm against the public benefits of the development. The applicant makes note of the Needs and Benefits</p>	

Ref.	Description of matter	Details of Agreement	RAG
		Addendum (Document Reference 7.7.7), which outlines the national scale benefits of the Aquind Interconnector.	
3.1.6	Residual Effects	The residual effects identified in section 21.9 and table 21.6 of Chapter 21 of the ES (Heritage and Archaeology) (APP-136) are agreed.	Agreed

3.2. MARINE ARCHAEOLOGY

Table 3.2 – Marine Archaeology

Ref.	Description of Matter	Details of Agreement	RAG
EIA			
3.2.1	Existing environment	<p>The sources of information within the ES adequately characterises the baseline for assessment of the Proposed Development (Refs: APP-129, Section 14.5; APP-397).</p> <p>Historic England’s Advice:</p> <p>Historic England provided comment on the geo-archaeological assessment work conducted to date, as described within the submitted Environmental Statement, within their Written Representation, We have therefore considered the response prepared by the Applicant within the Applicant’s Response to Written Representations (Document Ref: 7.9.5) and we note the attention given to the commitment that further analysis could be possible through delivery of any agreed marine archaeological Written Scheme of Investigation. However, it is acknowledged that any such analysis will be dependent on the decision to commission further geotechnical survey by the Consent Holder, should permission be obtained.</p> <p>Applicant’s Position:</p> <p>It is unclear from Historic England’s advice whether the Applicant’s response provided in REP2-014 has resolved the matter or not. Historic England has advised (24/11/2020) that they will provide further feedback in due course.</p>	On-going
3.2.2	Assessment Methodology	<p>The worst-case scenarios for impacts presented in the ES, are appropriate for the Proposed Development (Ref: APP-129, Section 14.6).</p> <p>The list of potential impacts on Marine Archaeology presented in the ES is appropriate (Ref: APP-129, Section 14.1.1.2).</p>	Agreed
3.2.3		<p>The methodology used for the EIA (Ref: APP-129, Section 14.4), based upon The Chartered Institute for Archaeologists Standard and Guidance for Historic Environment Desk-Based Assessment, represents an appropriate approach to assessing potential impacts of the Proposed Development on Marine Archaeology. This includes:</p>	Ongoing

Ref.	Description of Matter	Details of Agreement	RAG
		<ul style="list-style-type: none"> Assessment is based on expert judgement using knowledge of other sites and available project specific contextual information; The approach to cumulative effects assessment which is based upon PINS Advice Note Seventeen. <p>Historic England's Advice: The Written Representation submitted by Historic England acknowledges the assessment methodology employed by the Applicant as relevant to the description provided of the proposed development.</p> <p>Applicant's Position: It is unclear from Historic England's advice whether the matter has been resolved or not. Historic England has advised (24/11/2020) that they will provide further feedback in due course.</p>	
3.2.4	Conclusions	The assessment of impacts for construction, operation (maintenance and repair) and decommissioning presented in the ES is appropriate and effects on Marine Archaeology as a result of the Proposed Development are considered to be not significant (Ref: APP-129, Section 14.6).	Agreed
3.2.5		The cumulative effects assessment undertaken is appropriate and cumulative effects on Marine Archaeology as a result of the Proposed Development and other relevant plans and projects are considered to be not significant (Refs: APP-129, Section 14.7; APP-398; APP-144; APP-486).	Agreed
3.2.6		Assessment of transboundary effects is considered to be appropriate and transboundary effects on Marine Archaeology as a result of the Proposed Development are considered to be not significant (Refs: APP-129, Section 14.7.3; APP-398; APP-144)	Agreed
3.2.7	Mitigation	<p>It is agreed that given the impacts of the Proposed Development, the mitigation measures can be adequately captured within the DML (Refs: APP-129, Section 14.8; APP-397).</p> <p>Historic England's Advice: The Examination Authority has included the matters raised by Historic England regarding the detail of the draft Deemed Marine Licence' as set out within our submitted Written Representation.</p>	On-going

Ref.	Description of Matter	Details of Agreement	RAG
		<p>We understand that this matter is on the agenda for the Issue Specific Hearing on the draft Development Consent Order to be held on 9 December 2020 and specifically directed at the Applicant to address. We therefore have no further comment to offer until the Applicant has addressed these matters as requested by the Examination Authority.</p> <p>Applicant's Position:</p> <p>It remains whether the Applicant's comments provided in REP2-014 have resolved the matter or not. Historic England has advised (24/11/2020) that they will provide further feedback in due course.</p>	
Outline WSI			
3.2.8	Mitigation Measures	The Outline WSI sets out appropriate measures to mitigate against potential impacts to the historic environment as a result of the Proposed Development for consent (Ref: APP-397, Section 7).	Agreed
3.2.9	Timescales	The Outline WSI sets out appropriate timescales for the review and agreement of the document with the MMO and Historic England prior to the commencement of construction activities (Ref: APP-397, Sections 4.1, 4.2, 8 and 11.3).	Agreed
3.2.10	Updates	The Outline WSI sets out appropriate procedures for the provision of updates to the approved WSI, in the form of method statements (Ref: APP-397, Section 8).	Agreed
DML			
3.2.11	WSI Provision	<p>The DML includes adequate provision for the delivery of the project specific marine WSI (Ref: APP-019, Schedule 15, Part 2 Conditions 4(2)).</p> <p>Historic England's Advice:</p> <p>The Examination Authority has included the matters raised by Historic England regarding the detail of the draft Deemed Marine Licence' as set out within our submitted Written Representation. We understand that this matter is on the agenda for the Issue Specific Hearing on the draft Development Consent Order to be held on 9 December 2020 and specifically directed at the Applicant to address. We therefore have no further comment to offer until the Applicant has</p>	On-going

Ref.	Description of Matter	Details of Agreement	RAG
		<p>addressed these matters as requested by the Examination Authority.</p> <p>Applicant's Position:</p> <p>It remains whether the Applicant's comments provided in REP2-014 have resolved the matter or not. Historic England has advised (24/11/2020) that they will provide further feedback in due course.</p>	
3.2.12	WSI Updates	<p>The DML provides appropriate timescales for the review and approval of the marine WSI before the commencement of construction activities (Ref: APP-019, Schedule 15, Part 2, Condition 4(2) and 5).</p> <p>Historic England's Advice:</p> <p>The Examination Authority has included the matters raised by Historic England regarding the detail of the draft Deemed Marine Licence' as set out within our submitted Written Representation. We understand that this matter is on the agenda for the Issue Specific Hearing on the draft Development Consent Order to be held on 9 December 2020 and specifically directed at the Applicant to address. We therefore have no further comment to offer until the Applicant has addressed these matters as requested by the Examination Authority.</p> <p>Applicant's Position:</p> <p>It remains whether the Applicant's comments provided in REP2-014 have resolved the matter or not. Historic England has advised (24/11/2020) that they will provide further feedback in due course.</p>	On-going

4. SIGNATURES

Ref.	Historic England	AQUIND Ltd. (the Applicant)
Signature		
Printed Name		
Title		
On behalf of	Historic England	AQUIND Limited
Date		

APPENDIX 1

HISTORIC ENGLAND RESPONSE TO DRAFT DEEMED MARINE LICENCE_LETTER DATED 24 JULY 2019



Historic England

Sarah Lister
Senior Project Manager
Natural Power

Our ref: UKCS/ Aquind

Telephone: [REDACTED]

24th July 2019

Dear Sarah,

Thank you for your email dated 1st July 2019 requesting our advice on the draft deemed Marine Licence for the Aquind interconnector project.

Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

We have reviewed the document supplied to us along with our previous correspondence and wish to make the following comments.

- Part 1 Section 1 – definition of 'commence': Historic England does not agree that 'offshore site preparation works' should be excluded from the definition of 'commence' as such works have the potential to impact the seabed and therefore would require mitigation. We therefore disagree with the inclusion of Part 1 Article 6 and request its removal.
- Part 1 Section 1 – definition 'offshore HVDC cables': We note that there is an error in the form of repeated words in this paragraph which requires correction.
- Part 1 Section 1 – definition 'statutory historic body': This paragraph should refer to the Historic Buildings and Monuments Commission for England, of which Historic England is the trading name.
- Part 1 Section 4 – the address for Historic England is: Cannon Bridge House, 25 Dowgate hill, London, EC4R 2YA.
- Part 1 Article 10 – references arbitration: We defer to the MMO's opinion on this matter.



Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH

Telephone 01483 25 2020 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

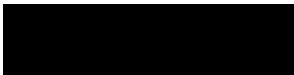
Correspondence or information which you send us may therefore become publicly available.



- Part 2 Article 7(1)(d) – Reference to archaeological mitigation should be included within the environmental management and monitoring plan with reference to the outline WSI.
- Part 2 Article 7(2) – We strongly recommend that the WSI should be completed at least 4 months prior to the commencement of construction activities to allow for sufficient time to produce and agree the WSI prior to pre-construction surveys, and therefore suggest the same amendment is made to Part 2 Article 8(1).
- Part 2 Article 10 (1)(a) – We strongly recommend that pre- and post-construction surveys also utilise high resolution side scan sonar data to better inform archaeological mitigation measures and post-construction monitoring of AEZs to demonstrate that no impact from the construction activities has occurred within these areas.

Please contact us directly if you wish to discuss our advice further.

Yours sincerely,



Pip Naylor,
Marine Planning Archaeological Officer
Email: Pip.Naylor@HistoricEngland.org.uk



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Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



APPENDIX 2

APPLICANT'S BRIEFING NOTE TO INFORM ONGOING CONSULTATION: RESPONSES TO PEIR FEEDBACK BRIEFING NOTE ON MARINE COMMENTS_AUGUST 2019

Natural Power Memorandum			
To	Historic England	Date	August 2019
From	Natural Power	Ref.	1199525

Briefing Note to inform Ongoing Consultation: Responses to PEIR feedback

The following table provides a summary of key items contained within feedback response on PEIR, gratefully received from the Historic England.

This briefing note is structured in order to provide information to reviewers as to how the applicant proposes to address the comments received as part of the s.42 consultation process.

Item No.	Topic	Comment	Applicant's Response
1	Marine Archaeology	In general, we are largely content with the impact assessment for archaeological receptors, in terms of the potential impacts considered, the size of the study area, and the range of datasets included at this stage. However, we wish to make the following comments with regards to the installation methods proposed, the archaeological assessment, and the mitigation measures suggested.	Acknowledged.
2	Marine Archaeology	We acknowledge that the current methodology for the installation of the cable at the landfall site is Horizontal Directional Drilling (HDD), which will emerge in the intertidal zone approximately 1km seawards from the transition joint bays in the car park behind Fraser Range. This method should be mindful of the potential to encounter archaeologically significant deposits within the sediment profile, and as such a strategic programme of investigation should be conducted to assess the potential of the deposits.	This will be considered in the Written Scheme of Investigations (WSI) produced post-consent as part of the conditions of the Deemed Marine Licence (DML). It is currently proposed that an Outline WSI will be submitted with the DCO application.
3	Marine Archaeology	We understand that a range of pre-installation clearance and preparation works may be required, including clearance of mobile bedforms, boulders, seabed debris, out of service cables, disposal of excavated material and UXO clearance, although UXO clearance will be consented through a separate marine licence. It should be noted that such activities could potential cause serious damage to features of the marine historic environment is present within the area to be impacted by the development. As such, suitable mitigation measures should be developed in consultation with the archaeological curator.	Acknowledged. It is currently anticipated that the WSI will incorporate a Protocol for Archaeological Discoveries (PAD) for those activities being consented under this DCO/DML. As the detonations of UXOs will be carried out under a separate marine licence, any impacts and mitigation measures required will be considered under that application. At this time,

Item No.	Topic	Comment	Applicant's Response
			it is expected that the Marine Management Organisation (MMO) will consult with relevant bodies including Historic England when determining a future application for UXO detonations. .
4	Marine Archaeology	We note that installation methods may include burial simultaneously with cable-lay, pre-lay burial or post-lay burial, with installation methods including trenching, ploughing and dredging. In some instances, non-burial cable protection methods, such as mattresses and rock placement, may also be required. All of these methods have the potential to seriously damage archaeological features, should they be present within the area to be impacted by the development. We further note from the documents that it is the intention to install the cables using in-line joints, but that it is possible that omega joints may be required in some places. This will increase the area impacted by the works. As such, suitable mitigation measures should be developed in consultation with the archaeological curator.	Any omega joint used would not extend beyond the currently assessed Marine Cable Corridor and as such any likely impact under the worst-case scenario has already been assessed. The mitigation currently proposed is therefore deemed sufficient and the WSI will include details of mitigation measures including a PAD and Archaeological Exclusion Zones (AEZs).
5	Marine Archaeology	Installation methods may require the use of grounding, within the intertidal area, and/or anchor spreads to maintain their position during installation. Both grounding and the use of anchors should also be mindful of archaeological features and follow mitigation procedures developed for the project. Additionally, we note that there is the potential for the use of 'flotation pits' to facilitate the installation of the cable within the nearshore area. It should be noted that the excavation of potentially large areas of the seabed could have a significant impact to both surface and burial archaeological features. This methodology would require careful mitigation to prevent impacts to the features of the marine historic environment.	<p>The use of flotation pits is note currently proposed for inclusion in the final project description, and therefore will not be assessed in the final ES.</p> <p>Grounding of vessels and anchor spread will be assessed further within the final ES however, as any impact will likely be within the Marine Cable Corridor it will be subject to the already proposed mitigation.</p>
6	Marine Archaeology	We are therefore disappointed to note that paragraph 14.4.8.3 states that 'as the design and construction methods for the Proposed Development are still evolving at the time of writing of this chapter,	The use of flotation pits and TSHD for pre-lay trenching for construction/installation of the cables is no longer proposed and will not be

Item No.	Topic	Comment	Applicant's Response
		<p>not all the proposed construction methods have been assessed.' Those not assessed include; the use of flotation pits to permit vessels to approach closers onshore, grounding of installation vessels, use of a TSHD to create the pre-lay trench. As these are some of the methods with the greatest potential for interaction and impact to heritage assets, to not include them within the preliminary environmental assessment makes it difficult for us to assess the full potential impact of the scheme. We therefore request that further information regarding these methods is included within the EIA.</p>	<p>included within the project description for the final ES.</p> <p>All other proposed construction methods will be fully described and assessed in the final ES.</p>
7	<p>Marine Archaeology</p>	<p>Additionally, we find that the information provided within Chapter 3 is insufficient to determine the maximum impacts of these techniques, in terms of both seabed surface and sediment depth to be impacted. Whilst we acknowledge that some of this information is presented within Appendix 3.2 'Marine Worse Case Scenarios' this should usefully be presented within the main chapter.</p>	<p>Acknowledged.</p> <p>As more detailed information is gathered and the project description finalised, the worst-case scenario will be updated in the final ES and presented in the main chapter.</p>
8	<p>Application</p>	<p>We understand from the documents we have received that the project is being designed to reduce the need for operational maintenance. Some inferences are made to the need to apply for an additional marine licence for operational maintenance should it be required, but it is unclear which activities are being sought for consent through this application and which will be sought separately. This should be clarified in any forthcoming application for consent.</p>	<p>It should be noted that many maintenance activities do not require a marine licence including:</p> <ul style="list-style-type: none"> • the removal and replacement of defective cable sections • removal of sediment to undertake repairs • the removal / replacement of cable protection to access the cable <p>However, where appropriate, further detail on operations and maintenance activities such as in-service inspection surveys and potential repairs / replacements will be provided within</p>

Item No.	Topic	Comment	Applicant's Response
			the project description. Any potential significant environmental effects will be assessed accordingly within the final ES.
9	Marine Archaeology	Sub-section 14.2.2 'Legislation' of Chapter 14 states that there are no Scheduled Monuments within the Proposed Development or ASA. This must be clarified to distinguish this comment as relating to below MHWS as the map of the ASA in Figure 14.1(same Chapter) clearly shows that the ASA buffers extends over not only Fort Cumberland (a scheduled monument) but also over a significant proportion of Portsmouth, Southsea and Langstone Harbour where further designations are present.	Figure 14-1 shows the data collection search area (ASA), but the presented gazetteer is then restricted to the Marine Cable Corridor. So yes, the data collection buffer extends onshore, but only marine and intertidal elements are taken forward in this chapter. Onshore receptors - such as Fort Cumberland - are discussed within the relevant onshore chapter. Figure 14.1 will be updated to make this clearer.
10	Marine Local	Within paragraph 14.2.3.4 of Chapter 14 reference is made to the UKMPS (2011), as per our previously advice, but considering that this is the primary national planning policy for the marine environment it is unclear why it is given only two sentences of explanation, as opposed to the several paragraphs reserved for the NPPF. Further detail on the role and relevance of the MPS should be included. Similarly, further detail on which policies within the South Inshore and South Offshore Marine Plans are of relevance should also be included.	Noted. A more thorough consideration of South Marine Plan Policies will be included as part of the DCO application. It should be noted that when a marine plan is adopted, it replaces the UK MPS as the marine policy document. It is also important to highlight for Nationally Significant Infrastructure Projects (NSIPs) such as the Aquind Interconnector, the primary planning documents are the UK National Policy Statements (NPS), in this case NPS EN-1, and only regard needs to be had to the South Marine Plan when determining the Aquind DCO application.
11	Marine Archaeology	We acknowledge from Appendix 14.2 'Marine Archaeology Technical Report' that geophysical and geotechnical data, consisting of sub-bottom profiler, multibeam bathymetry echo sounder, side scan sonar, magnetometry data, vibrocores and Cone Penetration Tests	The 100% terminology is not fully applicable for magnetometry data as the magnetometer is taken in lines across the assessment area rather than a wide area scan as with the side scan

Item No.	Topic	Comment	Applicant's Response
		(CPTs), was collected by MMT in November 2017 to March 2018. The geophysical datasets were assessed to be of good quality, with the exception of the magnetometer which was of average quality, though all datasets were still acceptable for archaeological assessment. We note from Appendix 14.2 that the surveys were run at 60m line spacing for the offshore section of the MCC (greater than 10m LAT), and that below 10m LAT (inshore section) the line spacing was 25m. However, it is not clear whether this methodology was successful in achieving 100% or greater coverage of the seabed from the text.	sonar. However, we are able to confirm that the data provides a full coverage assessment of the area.
12	Marine Archaeology	Furthermore, we acknowledge from Section 14.10 'Assessments and surveys still to be undertaken' of Chapter 14 that prior to installation further ground conditions surveys are to be conducted. These surveys should also be utilised for a further archaeological assessment, in order to refine mitigation measures based on the most up-to-date and/or highest resolution data. This should be undertaken by a qualified and experienced archaeologist to a method statement approved by the licence regulator and their archaeological curator.	Methodologies and mitigation measures will be detailed in the outline WSI submitted as part of the DCO application and the final WSI agreed and implemented post consent.
13	Marine Archaeology	We note from the archaeological assessment that localised palaeochannels and palaeovalleys were identified within the sub-bottom profiler data, which may contain in situ remains. Additionally, we understand that there are no wrecks with statutory protection within the ASA. The assessment identified a total of 387 anomalies, of which four are considered A1 anomalies with two of these relating to known UKHO wreck records. The two further receptors identified as A1 are described as a large debris field with a large magnetic anomaly, and a large magnetic anomaly with no surface expression.	Acknowledged.
14	Marine Archaeology	We further note that the remaining 383 anomalies identified are A2, there is a total of 104 recorded losses (A3), mostly dating from the post-medieval period onwards, and that there are no known aircraft	Acknowledged.

Item No.	Topic	Comment	Applicant's Response
		<p>crash sites within the ASA, but there are 21 recorded losses from the NRHE in the ASA, mostly relating to WWII losses. We understand that no new archaeological features or objects were identified within the intertidal walkover survey, however, there are two records from the NRHE and HER for prehistoric findspots that no longer exist at the locations provided.</p>	
15	<p>Marine Archaeology</p>	<p>However, the information provided in regards to the recorded losses in paragraph 14.9.1.4 of Chapter 14 does not appear to tally with that given in the baseline resources section (14.5 'Baseline Environment'). This must be amended or clarified.</p>	<p>These numbers have been checked and verified and detail provided within the PEIR, and to be included in the final ES is considered correct.</p>
16	<p>Marine Archaeology</p>	<p>However, we note that paragraph 14.4.5.5 of Chapter 14 describes the criteria for the assessment of archaeological value of marine assets shown in Table 14.2 as a five point scale, but the table itself only includes 4 points. This should be clarified or amended.</p>	<p>Table 14.2 will be corrected in the final ES submitted to PINS as part of the DCO application.</p>
17	<p>Marine Archaeology</p>	<p>Paragraph 14.6.2.9 of Chapter 14 references that without mitigation impacts on known potential seabed prehistory receptors could result in significant negative effects. However, with mitigation through further investigation this will become a significant major positive effect through its contribution to the knowledge base of seabed prehistory assets. Whilst we acknowledge this, we wish to caveat this statement with the fact that the positive effect will only be secured through the delivery of a strategic programme of archaeological investigation conducted by a qualified and experience archaeologist, with the result disseminated into the public domain. As such, we would wish to see this concept further detailed within the ES and Outline WSI submitted as part of the DCO application.</p>	<p>An outline WSI will be submitted as part of the DCO application for discussion and agreement and where relevant discussed in the final ES.</p>
18	<p>Marine Archaeology</p>	<p>We note that mitigation measures are proposed in Section 14.7 'Proposed Mitigation', which includes AEZs for the 4 A1 anomalies, each of 100m radiuses around the identified extent of the seabed feature. Additionally, paragraph 14.7.1.2 of Chapter 14 references</p>	<p>The monitoring of AEZs will be further discussed within the final ES.</p>

Item No.	Topic	Comment	Applicant's Response
		monitoring of AEZs to ensure that no disturbances during installation. We are greatly encouraged to see this provision included, and request further explanation with the EIA for this measure.	
19	Marine Archaeology	We understand that for A2 anomalies AEZs are not typically used, but the project tries to microsite them. However, the statement regarding 'the application of appropriate mitigation' of A2 anomalies should micrositing not be possible, should be more explicitly explained in reference to the mitigation strategies set out in 14.7 of Chapter 14.	Further investigations into the A2 anomalies to determine their archaeological value will be undertaken. This will inform what mitigation measures are required. Further discussion on A2 anomalies will be provided in the final ES and any proposed mitigation will be outlined in the outline / final WSI.
20	Marine Archaeology	We do not approve of the impact assessment provided in Table 14.7 'Direct and indirect impacts summary' of Chapter 14 for the use of anchors during construction, operation and decommissioning. Mitigation measures should include the use of AEZs and micrositing so that anchor positions avoid known archaeological assets, and consideration of the use of a PAD in case of a 'strike'.	Table 14.7 will be updated within the final ES to reflect the proposed mitigation measures.
21	Marine Archaeology	We note that no historic seascape characterisation assessment has been conducted within Chapter 14 'Marine Archaeology', and that Appendix 5.2 'Scoping Opinion' specifies that the Scoping Opinion from the Planning Inspectorate specified that it was acceptable for seascapes assessments to be scoped out of the Environmental Impact Assessment.	Acknowledged.

APPENDIX 3

HISTORIC ENGLAND RESPONSE TO MARINE BRIEFING NOTE_ LETTER DATED 27 AUGUST 2019



Historic England

Sarah Lister
Senior Project Manager
Natural Power

Our ref: UKCS/ Aquind

Telephone: [REDACTED]

27th August 2019

Dear Sarah,

Thank you for your email dated 2nd August 2019 requesting our advice on the Post-PEIR Briefing Note for the Aquind interconnector project. We have reviewed the document supplied to us, as referenced below, along with our previous correspondence and wish to make the following comments.

Briefing Note to inform Ongoing Consultation: Responses to PEIR Feedback (dated August 2019), prepared by Natural Power on behalf of Aquind Ltd.

We note that the majority of our previous comments have either been acknowledged or will be further detailed with the documents submitted in support of the Development Consent Order (DCO) application. As such, we reserved any further comments on these matters until we have reviewed this documentation. However, we do have further comments on a number of points as set out below.

In regards to Point 3, we acknowledge that it is the intention of the applicant to include a protocol for archaeological discoveries as mitigation to the potential impacts from pre-installation and clearance works. However, we wish to emphasise that this is not the sole mitigation measure that can be and should be applied. Any further detail provided within the DCO application would need to consider a range of mitigation measures as appropriate for the known and potential unknown archaeological receptors identified within the baselines assessment.

We note your comments within Point 8 regarding operations and maintenance activities, and that they are different to how this matter has been addressed in other DCO applications. We therefore recommend that you contact the competent authority (the MMO) for further detail are regarding operations and maintenance requirements, to get clearer expectations on this aspect of the project going forward.



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Please feel free to get in touch should you wish to discuss our advice further.

Yours sincerely,



Pip Naylor,
Marine Planning Archaeological Officer
Email: Pip.Naylor@HistoricEngland.org.uk



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APPENDIX 4

HISTORIC ENGLAND RESPONSE TO DRAFT MARINE WSI_ LETTER DATED 24 SEPTEMBER 2019



Historic England

Sarah Lister
Senior Project Manager
Natural Power

Our ref: UKCS/ Aquind

Telephone: [REDACTED]

24th September 2019

Dear Sarah,

Thank you for your email dated 5th September 2019 requesting our advice on the draft Marine Archaeology Outline Written Scheme of Investigation (WSI) for the Aquind interconnector project. We have reviewed the document supplied to us, as referenced below, along with our previous correspondence and wish to make the following comments.

Aquind Interconnector Marine Archaeology Outline Written Scheme of Investigation (dated September 2019), prepared by Wessex Archaeology on behalf of Aquind Ltd.

In general, we are satisfied that the draft document referenced above is adequate to act as draft Outline Marine WSI based on the information made available to us during the Preliminary Environmental Information Report consultation. However, subject to the information presented within the formal applicant for a Development Consent Order (DCO) we may wish to make additional comments.

In particular we were encouraged to see the inclusion of statements describing the need for co-ordination between the onshore and marine WSIs within paragraph 1.1.7, and the provision within paragraph 7.2.2 stating that the planning of any surveys covering Archaeological Exclusion Zones (AEZs) should include archaeological advice to maximise the archaeological benefits. We are also content that the mitigation measures set out in Section 7 are acceptable for an outline WSI. Specifically, we are pleased that the proposed AEZs are based on the extents of the sites, as opposed to the centre points of the features, and the inclusion of Section 9.11 'Post Construction Monitoring'.



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However, there are a number of areas that require further attention and amendments within the WSI, which are set out as follows.

The document references that the WSI is to be submitted at least 3 months prior to the commencement of construction activities. We recommend that this is increased to 4 months to allow for sufficient time for the review and agreement of the WSI in line with timeframes for consented marine licences for other marine interconnector cables. Furthermore, there is then reference made to part (d) of the DCO condition which references the need to submit archaeological reports to OASIS within 6 months of completion of the project. We recommend that the reports are submitted within 3 months of the approval of the final report by the MMO and their advisors, Historic England.

We note the content of paragraph 1.1.8, but wish to emphasise that Historic England no longer wish to see the WSI as a living document throughout the life of the project. The WSI should be updated and agreed by the MMO and their advisors prior to the commencement of construction activities, with subsequent project updates addressed through the production of method statements. Therefore, this and the subsequent paragraph need to be edited and/or removed.

Section 4.2 'Archaeological Curator(s)' states that we are the relevant heritage advisor from Mean High Water Springs (MHWS) out to 12nm. However, it should be noted that we offer our advice across the full extent of the South Inshore and Offshore Marine Plan Areas in reference to published objectives and policy for the historic environment. This section should be amended to reflect this.

Paragraph 4.2.4 should be amended to contain a timeframe for the submission of method statements prior to the commencement of planned works, to ensure clear expectations for all parties and to allow sufficient time for their review and agreement. Similarly, a timeframe should also be included within paragraph 8.1.4 for the submission of archaeological reports produced to the MMO and archaeological curators for review, and for both of these instances we recommend a timeframe of 4 months.

In relation to paragraph 9.5.1 which states contacts for discussing further investigation works, this should be amended to Historic England in general rather than solely the Regional Science Advisor.

It is recommended that ROV or diver surveys undertaken for UXO purposes, as set out in Section 9.7, ground truth at least 10% of all archaeological contacts, including those where impacts are likely and a proportion of those considered of low potential.

Further consideration should be given the application of watching briefs within Section 9.9, especially in relation to the excavation of Horizontal Directional Drilling (HDD) exit pits, once further details of the likely construction methods are known.



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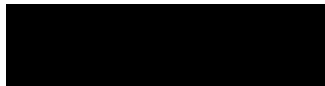
It is noted within paragraph 11.1.1 that 'all finds will, as a minimum, be washed...' This should be clarified to explain that any washing of finds will not occur until it has been determined whether any surface deposits, staining, or internal deposits are not of archaeological relevance, and any appropriate assessments undertaken.

There are also a number of errors that require revision:

- Paragraph 1.1.5 appears to have a number of words missing which makes it difficult to understand.
- The details provided within Section 4.2 'Archaeological Curator(s) is incorrect and must be updated as follows:
 - Pip Naylor, Marine Planning Archaeological Officer, Historic England, Cannon Bridge House, 25 Dowgate Hill, London, EC4R 2YA
 - Jane Corcoran, Regional Science Advisor for London and South East, Historic England, Cannon Bridge House, 25 Dowgate Hill, London, EC4R 2YA
- The guidance documents '*Environmental Archaeology: a guide to the theory and practice of methods, from sampling and recovery to post-excavation*' (English Heritage, 2011) and '*Geoarchaeology: using earth sciences to understand the archaeological record*' (Historic England, 2015b) should be included within the list given in paragraph 9.2.1 given that they are of relevance, and are referenced in Section 10.7 'Environmental Archaeology'.
- No details of a Protocol for Archaeological Discoveries (PAD) are appended to the draft WSI. Please ensure that this detail is included in the WSI prior to submission for the DCO.

Please feel free to get in touch should you wish to discuss our advice further.

Yours sincerely,



Pip Naylor,
Marine Planning Archaeological Officer
Email: Pip.Naylor@HistoricEngland.org.uk



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APPENDIX 5

HISTORIC ENGLAND S.56 RELEVANT REPRESENTATION - DATED 17 FEBRUARY 2020



Historic England

**PINs Registration and Relevant Representation
Form
Section 56 Planning Act 2008**

Our ref: Cable/Aquind

PINs Ref: EN020022

Date notified:
Response deadline: 19th February 2020

Telephone: [REDACTED]

Project outline: Aquind Interconnector Cable

Response made by: Pip Naylor (submitted by
Christopher Pater)

Date response issued: 17/02/2020

Representation:

Historic England (retaining the formal title of the Historic Buildings and Monuments Commission for England) is the government service championing England's heritage and giving expert, constructive advice. We summarise our representation regarding this proposed project as follows:

1. There is potential for this development to impact upon the historic environment, and that without mitigation this impact will be significant in relation to some receptors, including maritime, aviation and prehistoric heritage assets within the Marine Cable Corridor and designated heritage assets within the onshore cable route. We are aware the application includes an Environmental Statement (ES) and some amendments have been made to the ES since our letter of 29th April 2019 in relation to the Preliminary Environmental Information Report stage.
2. For the onshore historic environment, we note that an Optical Regeneration Station (ORS) is to be positioned in the north-east corner of a car park, located west of Fort Cumberland (Eastney, Portsmouth) which is protected as a Scheduled Monument and Grade II* Listed Building. The ORS has a proposed height of 4m at a distance of around 250m from the glacis (an area of sloping ground constructed as a part of the outer defences) and screening is proposed.

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Although the positioning of the ORS should allow a partial continuation of the line of sight from the ravelin (a triangular structure located inside the main ditch of the fort as a forward defence point) towards Fort Cumberland Road, there will be some harm to the view. As a result of this we would want to see this line of sight maintained to maximum extent through the redesign or repositioning of the ORS, in agreement with Historic England.

3. The application includes an outline Marine Written Scheme of Investigation (WSI), PINS document Reference: 6.3.14.3) which sets out how the proposed project might mitigate against impact to the historic environment, to which we provided comments prior to the submission of this application. We will therefore be looking to ensure that the deemed Marine Licence within the proposed draft Development Consent Order (DCO) includes adequate provision for delivery of a project specific WSI (should consent be granted).
4. Any final and agreed Marine WSI must enable the implementation of appropriate mitigation measures to avoid and reduce the impact from the development on the known and unknown historic environment. It is important that the marine WSI provides for the application of appropriate methodologies for further investigations conducted within the proposed project development area, as a key mechanism to inform the final stages of project planning, should consent be obtained. A relevant factor therefore is the timely way in which these matters are taken into consideration prior to the commencement of construction activities. Therefore, we recommend that the WSI is produced and agreed pre-commencement i.e. before the commencement of pre-construction activities and we will provide further advice within our Written Representation as necessary regarding Schedule 15 of the draft DCO. We will also provide further advice on any other matters relating to the proposed delivery of this development in reference to the details contained within the submitted DCO application.

Registration ID No: 20025047

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