AQUIND Limited

AQUIND INTERCONNECTOR

Applicant's Response to SoS Information Request – ES Validity Review

The Planning Act 2008

The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

Document Ref: 7.7.22

PINS Ref.: EN020022

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DOCUMENT: 7.7.22

DATE: 23 JULY 2021

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DOCUMENT

Document	7.7.22 Applicant's Response to SoS Information Request – ES Validity Review
Revision	001
Document Owner	WSP UK Limited
Prepared By	Multiple Authors
Date	23 July 2021
Approved By	M. Devine
Date	23 July 2021

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TABLES

1. INTRODUCTION

1.1.1.1. An application ('the Application') for a Development Consent Order ('DCO') for the Aquind Interconnector Project ('the Proposed Development') was made by Aquind Limited ('the Applicant') to the Secretary of State ('SoS') via the Planning Inspectorate ('PINS') under the Planning Act 2008 on 14th November 2019. The Application was accepted for Examination on 12th December 2019 with the Examination commencing on 8th September 2020. The Examination period closed on 8th March 2021.

1.1.1.2. Following PINS' recommendation made to the SoS on 8th June 2021, the SoS subsequently issued a request for further information on 13th July 2021; with one of the requests made being for the provision of a draft DCO which excludes the telecommunications buildings, the commercial use of the surplus capacity in the fibre optic cable and part of the optical regeneration stations for commercial telecommunications.

1.1.1.3. In connection with this request and in the interest of completeness, Table 2.1 details the outcomes of a review of the changes to the draft DCO and the impact of the exclusion of the telecommunications buildings, the commercial use of the surplus capacity in the fibre optic cable and part of the optical regeneration stations for commercial telecommunications on the findings of the Environmental Statement ('ES').

1.1.1.4. The assessments undertaken in respect of the marine environment and reported in chapters 6 – 14 of the ES are unaffected by the exclusion of the commercial telecommunications elements as they only relate to development which is located onshore. The fibre optic cables which are to be bundled with the marine HVDC cables do not change to any extent. Accordingly, these assessments are not discussed further.

1.1.1.5. It is also relevant to note that the fibre optic cable to be installed alongside the onshore HVDC cables also do not change to any extent, and as such these have not been further discussed in Table 2.1.

2. ENVIRONMENTAL STATEMENT VALIDITY REVIEW

Table 2.1 - Environmental Statement Validity Review

Document	Confirmation of whether ES remains valid and why
Chapter 15 (Landscape and Visual Amenity) (APP-130)	The difference in the Proposed Development arising from the removal of the Telecommunications Compound would be the removal of buildings/fencing and a short accessway from the main access route to the Converter Station Compound. This removal of above-ground infrastructure will reduce built development in the countryside, but in the wider context of the Converter Station Area and the construction to the north/north-east of the Telecommunications Buildings and their compound (referred to hereafter as the Telecommunications Compound) there are no different significant environmental effects in terms of landscape and visual amenity. There will be a localised reduction of landscape impacts at the site of the Telecommunications Buildings due to the absence of the above-ground telecommunications infrastructure, but this would not alter the level of significance of effects identified in the ES. In terms of the ORS buildings, a reduction in the size of the buildings resulting from the removal of the FOC cabinets would reduce landscape character and visual impacts, particularly in relation to the sense of openness and views experienced by residential and recreational receptors. The nature of the change whilst beneficial would be insufficient to alter the level of significance of effects identified in the ES. As such, the findings and residual effects reported in the Landscape and Visual Amenity assessment of the ES remain unchanged and valid.
Chapter 16 (Onshore Ecology) (APP-131)	The Telecommunications Compound is located in an area of species-poor semi-improved neutral grassland which is not considered to be an important ecological feature. No protected species or other important ecological features were recorded as using this particular location. The removal of the building from the Proposed Development would lead to a small increase in the amount of habitat to be replaced following the completion of temporary works in the area of Work No. 3 only.

Document	Confirmation of whether ES remains valid and why
	As such, there are no changes to any residual impacts reported in Chapter 16 of the ES in this regard. The reduction in size of the ORS buildings will also have no effect on the assessment and conclusions reported in Chapter 16 of the ES with regard to Onshore Ecology. Accordingly, the Onshore Ecology assessment reported in the ES remains valid.
Chapter 17 (Soils and Agricultural Land Use) (APP-132)	The Telecommunications Compound is located in an area of Grade 3a Good Quality Agricultural Land and the removal of the building from the Proposed Development would lead to a small increase in the amount of this type of agricultural land to be replaced following the completion of temporary works in the area of Work No. 3. Given the scale of this change in the context of the wider area there are no changes to any residual impacts as reported in Chapter 17 of the ES in this regard. With regard to the reduction in size of the ORS buildings, these were not assessed in the ES given the absence of any agricultural land at this location, which is currently used a car park, and there is therefore no change to the soils and agricultural land use assessment. The removal of the Telecommunications Compound from the DCO and the amendments to the ORS do not affect the Soils and Agricultural Land Use assessment, and therefore the assessment of soils and agricultural land use reported in the ES remains valid.
Chapter 18 (Ground Conditions) (APP-133)	The removal of the Telecommunications Compound will have no effect on the assessment and conclusions with regards to ground conditions. The ground investigation did not show any exceedances of the relevant human health assessment criteria for potential contaminants within the soil samples in the vicinity of the Converter Station, and given the scale of the Telecommunications Compound, the mitigation measures proposed during construction will remain the same as discussed in section 18.9 of the ES and valid. The reduction in size of the ORS buildings and any minor reduction in the size of the area developed will also have no effect on the assessment and conclusions in the ES with regards to ground conditions.

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Chapter 19 (Groundwater) (APP-134)	The Telecommunications Compound was considered as part of the combined assessment of Section 1 (Converter Station Area) of the Onshore Cable Corridor for the purposes of the ES and comprises only a small part of the Converter Station Area. The removal of the Telecommunications Compound from the DCO does not affect the Groundwater assessment reported in the ES. The removal of the Telecommunications Compound results in no change to the potential water quality and quantity impacts to the underlying Chalk aquifer identified in the ES. This is because the risks from the construction of the Converter Station which have been identified in the ES and which have been mitigated through measures detailed within the Generic Method Statement for the Converter Station construction all still remain valid following the removal of the Telecommunications Compound, which only represents a small part of the Converter Station Area. The reduction in the size of the ORS buildings will not alter the conclusions of the groundwater assessment regarding Section 10 in which the ORS buildings are situated. The main groundwater quantity risk identified relates to the cable trenching which could result in the requirement for sump pump dewatering and was assessed to have a Minor Adverse significance for impact to groundwater quantity. The reduction in size of the ORS buildings has no bearing on the outcome of this assessment. Similarly, the ES assessed the impact on groundwater quality to the Superficial Storm Beach Deposits (present where the ORS buildings are located) as being Negligible from the cable trenching and HDD. This assessment applies to the development of the ORS buildings and remains unchanged. Accordingly, the assessment of groundwater impacts reported in the ES is unchanged and remains valid.
Chapter 20 (Surface Water Resources and Flood Risk) (APP-135)	The Converter Station and Telecommunications Compound are both located in Flood Zone 1. The removal of the Telecommunications Compound will result in a minor reduction of impermeable surfaces which would lead to some reduction in runoff generated within the area during the Operational Stage. Any effects are likely to be minor, localised and are expected to have negligible significance in relation to the drainage strategy for the area. The reduction in the size of the ORS buildings would not result in a change to the flood risk and drainage profile of the area and therefore the conclusions in Chapter 20 of the ES would not change. The ES therefore remains unchanged and valid.

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Chapter 21 (Heritage and Archaeology) (APP-136)	All land within Section 1 (Converter Station Area) of the Onshore Cable Corridor was considered in the ES as being potentially impacted by construction activities. Preliminary works and the potential impact from the removal of topsoil are considered likely to form the main impact on potential below ground archaeological remains in this section (as outlined in paragraph 21.6.2.4 of the ES). The removal of the Telecommunications Compound, which forms a small part of the Converter Station Area, will result in a minor reduction in deeper impact (from the insertion of shallow foundations). Though as the site wide strip has been assumed within Section 1 this minor change does not affect the Heritage and Archaeology assessment reported in the ES. In relation to the ORS, any reduction in the size of the buildings would not result in a change to the reporting of effects on potential below ground archaeological remains within the Landfall. It was assumed that all land within the proposed compound would be impacted by preliminary site works including site preparation/ stripping, which may form the primary impact. Though, where remains survive to a greater depth, a reduction to the overall ORS footprint may lessen the extent (and depth) of physical impact. Due to the minor nature of the change this would be insufficient to alter the overall level of significance or the residual effects as reported in Chapter 21 of the ES. With regard to built heritage setting, the applicant assessed the overall effect to Fort Cumberland scheduled monument as negligible (as reported in Chapter 21 of ES). Whilst beneficial to the historic setting of nearby assets, based on the level of impact as assessed a reduction of the scale and massing of the building would therefore not alter the settings assessment, which remains valid. Accordingly, the assessment of heritage and archaeology impacts reported in the ES remains valid.
Chapter 22 (Traffic and Transport) (APP-137)	The assessment of traffic and transport was based upon the peak construction traffic period, which occurs during site establishment / enabling works and site preparation for the main civil engineering works. Whilst the removal of the Telecommunications Compound would reduce the number of traffic movements, by removing those required in connection with it, this would not reduce the peak construction traffic on which the assessment of traffic and transport impacts is based. Accordingly, its removal has no impact upon the construction traffic assumptions used or the conclusions contained in the ES in this regard. The Operational Stage of the development was scoped out of the Traffic and Transport assessment. This is because the Proposed Development will generate only minor traffic increases during the Operational Stage, limited

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	to a few vehicles per month at the Converter Station. The removal of the Telecommunications Compound therefore does not impact the conclusions reported in Chapter 22. The assessment of construction at Landfall was based upon one cable gang being located within Fort Cumberland car park generating four two-way HGV movements and two two-way LGV movements per day. A reduction in the size of the ORS buildings will not impact upon the Construction Stage assessments completed for the local highway network. As stated above, the Operational Stage of the Proposed Development was scoped out of the assessment due to the very minor traffic generation during operation.
Chapter 23 Air Quality (REP1-033)	The ES concluded that there were no specific residual air quality impacts associated with the construction or operation of the Telecommunications Compound. The removal of this structure from the Proposed Development does not change the outcomes of the air quality assessment. Regarding the reduction in size of the ORS buildings, the design includes the provision of backup power from two ≤200 kVA diesel powered generators which are sources of air emissions. However, the reduction in building size will not impact on the requirement for back-up power and as such there is no change to the outcomes of the assessment of air quality. Accordingly, the assessment of air quality impacts reported in the ES is unchanged and remains valid.
Chapter 24 Noise and Vibration (APP-139)	The removal of the Telecommunications Compound from the Proposed Development is predicted to result in a decrease in noise levels at Millfield Farm of 0.1 dB, during the Operational Stage, which is not significant. Noise levels at all other noise sensitive receptors reported in the ES are predicted to remain the same. The construction of the Telecommunications Compound is predicted, within the ES, to result in negligible noise and vibration impacts at the nearest noise sensitive receptors (i.e. resulting in no significant effects). Consequently, the absence of construction would not significantly change the findings reported in the ES. The proposed reduction in scale of the ORS buildings is not likely to result in any changes to the findings of the noise and vibration assessment as reported in Chapter 23 of the ES. In summary, the findings of the noise and vibration assessment as reported in Chapter 23 of the ES remain valid.

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Chapter 25 Socio-economics (APP-140)	The ES concluded that there were no specific residual socio-economic impacts associated with the construction or operation of the Telecommunications Compound. The removal of this structure from the Proposed Development does not change the outcomes of the assessment of socio-economic impacts. Furthermore, a reduction in size of the ORS buildings will result in a negligible change to the outcome of the assessment of socio-economic impacts, given the scale of the change compared to the remaining aspects of the Proposed Development. Therefore, the assessment of socio-economic impacts reported in the ES is unchanged and remains valid.
Chapter 26 Human Health (APP-141)	The ES concluded that there were no specific residual human health impacts associated with the construction or operation of the Telecommunications Compound or ORS buildings. The removal of the Telecommunications Compound from the Proposed Development and the reduction in size of the ORS buildings do not change the outcomes of the assessment of the impact of the Proposed Development on human health. Therefore, the assessment of human health impacts reported in the ES is unchanged and remains valid.
Chapter 27 Materials and Waste (APP-142)	The exclusion of the Telecommunications Compound would result in a small decrease in the materials required for the Proposed Development. The volume of waste anticipated to be generated through the construction of the Telecommunications Compound is considered to be negligible, due to the small size of the building. As such, in the context of the Proposed Development as a whole, the exclusion of the Telecommunications Compound would not change the findings of the assessment of waste and material resources. Similarly, a reduction in size of the ORS buildings would result in a small decrease in the materials required for the Proposed Development and waste generated during construction. These volumes are considered to be negligible and would not change the findings of the assessment of waste and material resources. Therefore, the assessment of waste and material resources reported in the ES is unchanged and remains valid.
Chapter 28 Carbon and	With regard to the carbon assessment, the exclusion of the Telecommunications Compound and a small reduction in the size of the ORS buildings would result in a relatively small decrease in the materials required for the Proposed Development, and therefore a small decrease in embodied emissions. The emissions from transport

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Climate Change (APP-143)	and waste are anticipated to be negligible due to the small size of the building and materials required. As such, in the context of the Proposed Development as a whole the exclusion of the Telecommunications Compound and small reduction in the size of the ORS buildings would not change the findings of the assessment of GHG emissions. With regards to the assessment in relation to climate change, the Telecommunications Compound was considered with the Converter Station for the assessment of Operational Stage impacts and for the Construction Stage it was assessed within the wider scheme construction. The removal of the Telecommunications Compound will not result in any changes to the likely impacts of climate on the Proposed Development, given the scale of the building in the context of the Converter Station buildings. Furthermore, in relation to a reduction in size of the ORS buildings at the Landfall, this would not result in any changes to the likely impacts of climate on the Proposed Development, given that the buildings will remain present, albeit slightly smaller, and will remain subject to climate impacts. As such, the assessment of carbon and climate change related impacts reported in the ES is unchanged and remains valid.