



AQUIND Limited

AQUIND INTERCONNECTOR

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

The Planning Act 2008

The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

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AQUIND Limited

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**Applicant's Response to Second Information
Request – ES Validity Review**

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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 the 14th November 2019. The Application was accepted for Examination on the 12th December 2019 with the Examination commencing on the 8th September 2020. The Examination period closed on the 8th March 2021.
- 1.1.1.2. Following PINS' recommendation made to the SoS on the 8th June 2021, the SoS subsequently issued a request for further information on the 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 ('ORS') for commercial telecommunications.
- 1.1.1.3. In connection with this request, the Applicant issued 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 the removal of commercial telecommunications equipment from the ORS buildings on the findings of the Environmental Statement ('ES'). The review is detailed within the Applicant's Response to SoS Information Request – ES Validity Review (document reference 7.7.22), submitted by the Applicant on the 23rd July 2021.
- 1.1.1.4. The SoS issued an additional request for further information on the 2nd September 2021, with one of the requests being the confirmation of any changes to the the impact on Fort Cumberland car park anticipated if the commercial telecommunications elements of the Proposed Development are removed and the ORS are reduced in size.
- 1.1.1.5. An alternative set of Indicative ORS Elevations and Floorplans (Document Ref. 2.10 Rev03), and an alternative ORS Parameter Plan (Document Ref 2.11 Rev 03) have been prepared and are submitted as part of the Applicant's response to the 2nd September 2021 information request together with this ES Validity Review document. The alternative Parameter Plans for the ORS, together with the amendments to the permitted maximum parameters contained within the alternative draft DCO also submitted, provide details of the reduced scale of the ORS Compound and associated infrastructure as set out below:
- The revised ORS compound parameters are 30m long x 16.4m wide (previous parameters were 35m x 18 m);

- The revised ORS building parameters for each building are 4.4m long x 3.65m wide and 4m high (previous parameters 11m x 4m x 4m); and
- Security Perimeter Fence dimensions are now 30m long x 16.4m wide and 2.45m high (previous parameters 30m x 18m x 2.45m).

1.1.1.6. A review of the continued validity of the of findings the ES, as submitted, is set out in Table 2.1 below and, where relevant, expands on the review provided previously on 23rd July 2021.

1.1.1.7. 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 of the Proposed Development 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 topics and their related assessments are not discussed further.

1.1.1.8. It is also relevant to note that the fibre optic cables 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
<p>Chapter 15 (Landscape and Visual Amenity) (APP-130)</p>	<p>With regards to the reduction in the scale of the ORS buildings, the removal of the commercial elements of FOC infrastructure would result in a reduction in the overall width of each of the ORS Buildings (from 11m to 4.4m) and a small reduction in length (from 4m to 3.65m). There is no change to the proposed maximum height of the proposed buildings.</p> <p>A reduction in the size of the buildings and compound would reduce landscape character and visual impacts, particularly in relation to the sense of openness and views experienced by residential and recreational receptors, however 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 in section 15.8.15 of Chapter 15 of the ES (APP-130) and section 9.3 of the ES Addendum (REP1-139) remain unchanged and valid.</p>
<p>Chapter 16 (Onshore Ecology) (APP-131)</p>	<p>The reduction in size of the ORS buildings will have no effect on the assessment and conclusions reported in Chapter 16 of the ES with regard to Onshore Ecology as the ORS buildings remain within the original parameter area within the Fort Cumberland car park.</p> <p>Accordingly, for conclusion of the Onshore Ecology assessment which identified that no significant effects are predicted within Section 10 (Landfall) at either the Construction or Operation Stage, as reported in section 16.6.3 of Chapter 16 (Onshore Ecology) (APP-131) of the ES, remain valid.</p>
<p>Chapter 17 (Soils and Agricultural</p>	<p>With regard to the reduction in size of the ORS buildings, the impacts of these facilities on Soils and Agricultural Land Use were not assessed in the ES given the absence of any agricultural land at this location, which is currently used as a car park. There is therefore no change to the soils and agricultural land use assessment.</p>

Document	Confirmation of whether ES remains valid and why
Land Use) (APP-132)	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 Chapter 17 (Soils and Agricultural Land Use) (APP-132) of the ES remains valid.
Chapter 18 (Ground Conditions) (APP-133)	<p>The reduction in size of the ORS buildings and compound will have no effect on the conclusions of the assessment of Ground Conditions as there is only a minor reduction in the development area and therefore a minor reduction in the exposure of contaminated soils through construction activities including excavation which will cause less disturbance to the geology and soils underlying the site which could then impact upon identified receptors. In addition, there will be a minor reduction of risk of leaching of contaminants to groundwater specifically Principal Aquifers, if contaminants or groundwater are present.</p> <p>The assessment of ground conditions reported in Chapter 18 (Ground Conditions) (APP-133) of the ES remains valid.</p>
Chapter 19 (Groundwater) (APP-134)	<p>The reduction in the size of the ORS buildings and compound will not alter the conclusions of the groundwater assessment in relation to Section 10 in which the ORS are situated. The main groundwater quantity risk identified relates to the cable trenching which could result in the requirement for sump pump dewatering. This risk 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, which applies to where the ORS are proposed, remains unchanged.</p> <p>Accordingly, the assessment of groundwater impacts as reported in section 19.6 of Chapter 19 (Groundwater) (APP-134) of the ES is unchanged and remains valid.</p>
Chapter 20 (Surface Water Resources and	The reduction in the impermeable footprint of the ORS buildings would result in a very slight reduction in the surface water management requirements. However, the reduction in the size of the ORS buildings and compound would not result in any change to the flood risk and drainage profile of the area and therefore the conclusions of the ES assessment would not change

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Flood Risk) (APP-135)	The assessment of surface water resources and flood risk as reported in section 20.7 of Chapter 20 (Surface Water Resources and Flood Risk) of the ES (APP-135) and associated Appendix 20.4 Flood Risk Assessment (APP-439), ES Addendum (REP1-139) Section 13 and associated Appendix 8 Flood Risk Assessment Addendum (REP1-157) therefore remains unchanged and valid.
Chapter 21 (Heritage and Archaeology) (APP-136)	<p>In relation to the ORS, the reduction in the size of the buildings would not result in a change to the conclusion in respect of effects on potential below ground archaeological remains at the Landfall. It was assumed that all land within the proposed ORS compound would be impacted by preliminary site works including site preparation/stripping, which may form the primary impact. Where remains survive to a greater depth, a reduction to the overall ORS footprint may lessen the extent (and depth) of any physical impact. However, 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.</p> <p>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 and section 14 of the ES Addendum (REP1-139)). Whilst the reduction in the size of the ORS buildings and compound would be beneficial to the historic setting of nearby assets, based on the level of impact as assessed a reduction of the scale and massing would not alter the settings assessment, the conclusion of which therefore remain valid.</p> <p>Accordingly, the assessment of heritage and archaeology impacts as reported in section 14.3 of the ES Addendum (REP1-139) remains valid.</p>
Chapter 22 (Traffic and Transport) (APP-137)	<p>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 reduction in the size of the ORS buildings will not impact upon the Construction Stage assessments completed for the local highway network.</p> <p>As detailed in Section 22.3.5 of Chapter 22 (Traffic and Transport) (APP-137), the Operational Stage of the Proposed Development was scoped out of the assessment, as agreed with statutory consultees during the consultation process, due to the very minor traffic generation during operation.</p>

Document	Confirmation of whether ES remains valid and why
	<p>A slight increase in the number of parking spaces that could potentially be accommodated within the retained car park area at Fort Cumberland Car Park (subject to detailed design) whilst beneficial would be insufficient to require an assessment of the Operational Stage of the Proposed Development and therefore would not alter the level of significance of effects identified in the ES. As such, the findings and residual effects reported in Chapter 22 of the ES (APP-137) and Chapter 15 of the ES Addendum (REP1-139) remain unchanged and valid.</p> <p>Therefore, the assessment of traffic and transport impacts, as reported in section 22.6.14 of Chapter 22 (Traffic and Transport) of the ES (APP-137) and Chapter 15 of the ES Addendum (REP1-139) remains valid.</p>
<p>Chapter 23 Air Quality (REP1-033)</p>	<p>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. The reduction in the output of the generators from 2 x 220kVA to 2 x 80kVA will reduce emissions.</p> <p>It should be noted that the assessment method applied EU Stage IV-Q emissions limit concentrations to represent the Aquind generators (220kVA) in the absence of manufacturer emissions specifications. The generators with lower output (80kVA) would fall under EU Stage IV-R for which are the same (except for carbon monoxide). Emissions are also likely to be lower than assessed because the generators procured (assuming after 2021) likely to meet more stringent emission EU Stage IV-R limits.</p> <p>Accordingly, air quality concentrations and impacts are likely to be lower than reported in section 23.6 of Chapter 23 (Air Quality) (REP1-033) and the conclusions of the ES remain unchanged and valid.</p>
<p>Chapter 24 Noise and Vibration (APP-139)</p>	<p>The noise levels at the nearby noise sensitive receptors are predicted to remain unchanged from those reported in Chapter 24 (noise and vibration) of the ES, as a result of the proposed reduction in scale of the ORS buildings.</p> <p>With respect to the proposed reduction in size of the diesel generators, the smaller dimensions equate to a smaller noise-radiating body. Assuming the power rating of the generator remains the same or lower, it is likely that the noise levels at the nearby noise sensitive receptors would remain unchanged, or be marginally lower than those reported in Chapter 24 (noise and vibration) of the ES.</p>

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	<p>In summary, the proposed changes are anticipated to result in a negligible change in noise levels at the nearby noise sensitive receptors and findings of the noise and vibration assessment as reported in section 24.6 of Chapter 24 (Noise and Vibration) (APP-139) of the ES remain valid.</p>
<p>Chapter 25 Socio-economics (APP-140)</p>	<p>A reduction in size of the ORS buildings will result in negligible changes to the outcome of the assessment of socio-economic impacts.</p> <p>The reduction in scale of the ORS buildings and compound will be sufficient to facilitate the provision of eight additional car parking spaces once the car park is reinstated, which would be beneficial to users. The reduction in the ORS would allow 129 car parking spaces to be reinstated (originally 121). The indicative car park layouts are presented in Appendix A and B of this note. Based on the level of impact as assessed however, this would not alter the outcome of the assessment. Therefore, the assessment of socio-economic impacts reported in section 25.7 of Chapter 25 (Socio-economics) (APP-140) of the ES is unchanged and remains valid.</p>
<p>Chapter 26 Human Health (APP-141)</p>	<p>The conclusions of the assessment within the ES identified that there were no specific residual human health impacts associated with the construction or operation of the ORS buildings. The reduction in size of the ORS buildings would not change the outcomes of the assessment of the impact of the Proposed Development on human health.</p> <p>Therefore, the assessment of human health impacts reported in section 26.6.3 of Chapter 26 (Human Health) (APP-141) of the ES is unchanged and remains valid.</p>
<p>Chapter 27 Materials and Waste (APP-142)</p>	<p>A reduction in size of the ORS buildings would result in a very small decrease in the materials required for the Proposed Development and waste generated during construction. These volumes are negligible and would not change the findings of the assessment in relation to waste and material resources.</p> <p>Therefore, the assessment of waste and material resources as reported in section 27.6 of Chapter 27 (Waste and Materials) of the ES (APP-142) is unchanged and remains valid.</p>
<p>Chapter 28 Carbon and</p>	<p>With regard to the carbon assessment, the reduction in the size of the ORS buildings would result in a very small decrease in the materials required for the Proposed Development, and therefore a small decrease in embodied</p>

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<p>Climate Change (APP-143)</p>	<p>emissions. The emissions from transport and waste are anticipated to be negligible due to the small size of the buildings and materials required. As such, the reduction in the size of the ORS buildings would not change the findings of the assessment of GHG emissions as reported in section 28.6 of Chapter 28 (Carbon and Climate Change) (APP-143) of the ES.</p> <p>With regards to the assessment in relation to climate resilience, the reduction in size of the ORS buildings at the Landfall would not result in any changes in climate on the Proposed Development, given that the buildings will remain present, albeit smaller.</p> <p>As such, the assessment of carbon and climate resilience related impacts as reported in section 28.12 of Chapter 28 (Carbon and Climate Change) (APP-143) of the ES is unchanged and remains valid.</p>

APPENDIX A - FORT CUMBERLAND CAR PARK PROPOSED CAR PARK GENERAL LAYOUT – ORIGINAL

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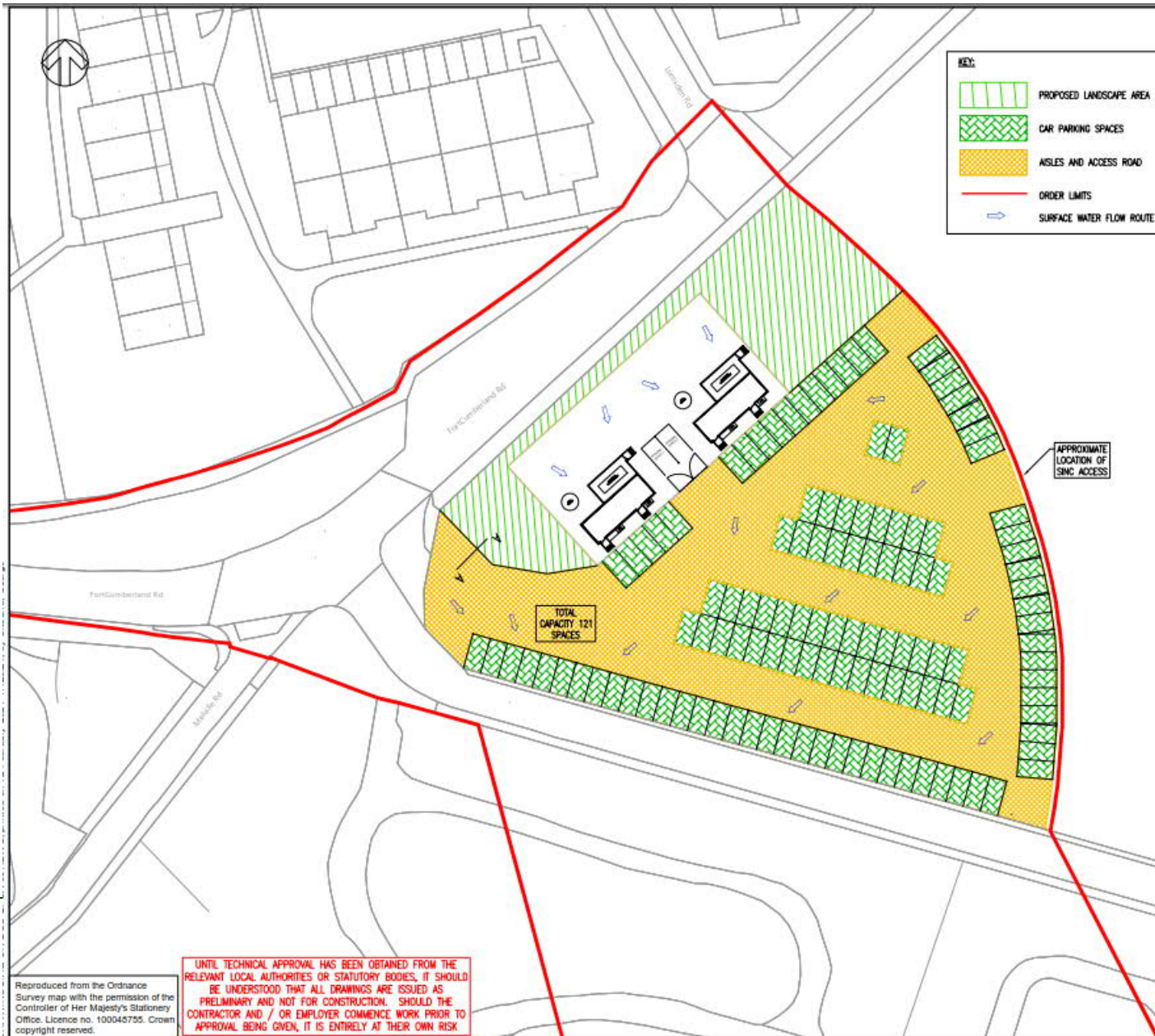
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September 2021

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DO NOT SCALE

NOTES:

- ALL FORMAL PARKING SPACES USE DIMENSIONS OF 2.4m by 4.8m.
- CAR PARK AISLES AND ACCESS ROAD TO BE CONSTRUCTED USING ASPHALT AS SHOWN IN A TYPICAL STANDARD DETAIL IN DRAWING. AQ-UK-DCO-DI-SD-001. EXACT DETAILS OF SUB-BASE, BINDER COURSE AND BASE COURSE DEPTHS WILL BE CONFIRMED DURING DETAILED DESIGN.
- CAR PARKING SPACES TO BE CONSTRUCTED FROM GRASSCRETE / GRASSBLOCK OR SIMILAR MODULAR, PRE-CAST CONCRETE SYSTEM. SEE DRAWING AQ-UK-DCO-DI-SD-002 FOR REFERENCE OF GRASSCRETE DETAIL. EXACT PRODUCT DETAILS TO BE CONFIRMED DURING DETAILED DESIGN.
- FINISH LEVELS TO BE PROPOSED TO ALLOW SURFACE WATER TO RUN TO THE GRASSCRETE AREAS.
- IT IS ASSUMED THAT PERMEABILITY OF THE SOIL UNDER THE CAR PARK IS ADEQUATE FOR USING SUDS DRAINAGE. FURTHER INVESTIGATION ABOUT SOIL CONDITION TO BE CONFIRMED DURING DETAILED DESIGN.

E	12/02/2021	HN	UPDATED AISLES AND ACCESS ROAD	DR	CHK
A	02/12/2020	AH	FIRST ISSUE	DR	CHK
REV	DATE	BY	DESCRIPTION	CHK	APP

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PROJECT:
AQUIND

TITLE:
FORT CUMBERLAND CAR PARK
PROPOSED CAR PARK GENERAL LAYOUT

SCALE @ A3:	1:500	DRAWN:	AH	APPROVED:	AH
PROJECT No:	02100010	DESIGNED:	HN	DATE:	February 21

DRAWING No: AQ-UK-DCO-TR-LAY-007 **REV:** E

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**APPENDIX B - FORT CUMBERLAND CAR PARK PROPOSED CAR PARK
GENERAL LAYOUT – REVISED**

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PINS Ref.: EN020022

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September 2021

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File name: \\UK\WSP\GROUP\COM\CENTRAL_DATA\PROJECTS\0210\000\02100016 - AQUIND\VO NO.3\IE MODELS AND DRAWINGS\300 - SITE\320 - TASK 7 UK ROUTE\SK\AQ-UK-DCO-TR-LAY-007 COPY.DWG, printed on 10 September 2021 15:29:54, by Ivana, Amber



DO NOT SCALE

- NOTES:
- ALL FORMAL PARKING SPACES USE DIMENSIONS OF 2.4m by 4.8m.
 - CAR PARK AISLES AND ACCESS ROAD TO BE CONSTRUCTED USING ASPHALT. DETAIL: 17 SUB-BASE, BINDER COURSE AND BASE COURSE WILL BE CONFIRMED DURING DETAILED DESIGN.
 - CAR PARKING SPACES TO BE CONSTRUCTED FROM GRASSCRETE / GRASSBLOCK OR SIMILAR MODULAR, PRE-CAST CONCRETE SYSTEM. EXACT DETAILS TO BE CONFIRMED DURING DETAILED DESIGN.

KEY:
 PROPOSED LANDSCAPE AREA

REV	DATE	BY	DESCRIPTION	CHE	APP
F	10/08/2021	AM	UPDATED ORS BUILDING FOOTPRINT, LANDSCAPING AND INCREASED CAR PARK CAPACITY		
E	12/02/2021	HM	UPDATED AISLES AND ACCESS ROAD	0.8	0.8
D	11/02/2021	AM	UPDATED CAR PARK DESIGN WITH INCREASED CAPACITY	0.8	0.8
C	25/01/2021	AW	CAR PARK AISLES AND SPACES CONSTRUCTION INFORMATION ADDED	0.8	0.8
B	02/12/2020	AM	ADDITION OF APPROXIMATE SINC ACCESS LOCATION	0.7	0.8
A	02/12/2020	AM	FIRST ISSUE	0.7	0.8

DRAWING STATUS: **E2 - FOR INFORMATION**

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CLIENT:

PREPARED BY: -

PROJECT: **AQUIND**

TITLE: **FOOT CUMBERLAND CAR PARK
 PROPOSED CAR PARK LAYOUT WITH
 FORMAL PARKING BAYS**

SCALE @ A3: 1:500 CHECKED: CW APPROVED: CW

PROJECT No: E2100016 DESIGNED: - DRAWN: AV1 DATE: September 21

DRAWING No: **AQ-UK-DCO-TR-LAY-007** REV: **F**

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