



**AQUIND Limited**

---

# **AQUIND INTERCONNECTOR**

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

The Planning Act 2008

The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

Document Ref: 7.7.24

PINS Ref.: EN020022

**AQUIND Limited**

---

# **AQUIND INTERCONNECTOR**

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

**PINS REF.: EN020022**

**DOCUMENT: 7.7.24**

**DATE: 18 NOVEMBER 2021**

WSP

WSP House

70 Chancery Lane

London

WC2A 1AF

+44 20 7314 5000

[www.wsp.com](http://www.wsp.com)

## DOCUMENT

<b>Document</b>	<b>7.7.24 Applicant's Response to Third Information Request – ES Validity Review</b>
<b>Revision</b>	001
<b>Document Owner</b>	WSP UK Limited
<b>Prepared By</b>	Multiple Authors
<b>Date</b>	18.11.2021
<b>Approved By</b>	P Allen
<b>Date</b>	18.11.2021

## CONTENTS

1.	INTRODUCTION	1-1
2.	ENVIRONMENTAL STATEMENT VALIDITY REVIEW	2-1

---

## TABLES

Table 2.1 - Environmental Statement Validity Review	2-1
---	-----

---

# 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 14<sup>th</sup> November 2019. The Application was accepted for Examination on the 12<sup>th</sup> December 2019 with the Examination commencing on the 8<sup>th</sup> September 2020. The Examination period closed on the 8<sup>th</sup> March 2021.
- 1.1.1.2. Following PINS' recommendation made to the SoS on the 8<sup>th</sup> June 2021, the SoS subsequently issued a request for further information on the 13<sup>th</sup> 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 23<sup>rd</sup> July 2021.
- 1.1.1.4. The SoS issued an additional request for further information on the 2<sup>nd</sup> September 2021, including a request for confirmation of any changes to 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) were prepared and submitted as part of the Applicant's response to the 2<sup>nd</sup> September 2021 information request, together with an ES Validity Review document (Document Ref. 7.7.23).

- 1.1.1.6. On 4th November 2021, the SoS issued a third request for information (the ‘Third Information Request’) from the Applicant in respect of the Application, more particularly seeking information regarding: (1) the consideration of alternatives; (2) alignment of the works to deliver the Proposed Development in parallel with the North Portsea Island Coastal Defence Scheme; (3) the effect of changes to the National Planning Policy Framework (‘NPPF’) in respect of Flood Risk; and (4) seeking a further update on the Applicant’s negotiations with National Grid Electricity Transmission (NGET) Plc. This ES Validity Review addresses point (4) regarding negotiations with NGET with respect to the micro-siting of the Converter Station, specifically with relation to Option B(i) and Option B(ii).
- 1.1.1.7. As part of the Applicant’s response to the Third information Request, the Applicant will submit amended plans and dDCO which provide for the removal of Option B(i) for the siting of the Converter Station, for if the SoS chooses to make such an Order once the Applicant has confirmed the agreements with NGET has been completed. Therefore, this ES Validity Review considers the removal of Option B(i) and how or if this affects the conclusions made in the ES. This review therefore verifies previous assessment conclusions and identifies where impacts no longer occur or conclusions on significance are lessened.
- 1.1.1.8. Where applicable, within the technical chapters of the ES, both options for the converter station siting have been assessed with the worst-case being identified. It should be noted that the spatial extent of both options B(i) and B(ii) has been assessed for the purpose of the ES to ensure a robust assessment of the likely significant effects.
- 1.1.1.9. The assessments undertaken in respect of the marine environment and reported in chapters 6 – 14 of the ES would be unaffected by the removal of Option B(i). Therefore, only the onshore chapters are considered as part of this ES validity review.

## 2. ENVIRONMENTAL STATEMENT VALIDITY REVIEW

**Table 2.1 - Environmental Statement Validity Review**

Document	Confirmation of whether ES remains valid and why
<p><b>Chapter 15 (Landscape and Visual Amenity) (APP-130)</b></p>	<p>Option B(i) and Option B(ii) are considered throughout the Landscape and Visual Amenity ES chapter, particularly with respect to Zones of Theoretical Visibility (ZTV) and representative viewpoints. To inform the assessment, ZTV and wirelines of the parameter envelope were prepared for both Option B(i) and B(ii). It is noted that Option B(ii) would allow the retention of an existing hedgerow, containing hedgerow trees and groups of trees, which provide an important visual screening function.</p> <p>The approach to the assessment is set out in paragraphs 15.8.2.5 to 15.8.2.7:</p> <p><i>“...the assessment is based on a worst-case scenario for the Converter Station considering whichever of Options B(i) and B(ii) have the greater effect at a specific receptor area or location in the case of visual receptors. It should also be noted that as both options would have the same effect on landscape character, except very locally where Option B(ii) would avoid the removal of the existing hedgerow an important landscape feature. This is not repeated in the summary of assessment of effects.</i></p> <p><i>The assessment also takes a worst-case scenario approach to the Onshore Cable Corridor and Landfall where there would be a range of views experienced by receptors, the “worst case” being those receptors likely to have direct open views of the Proposed Development.</i></p> <p><i>Where ‘the Converter Station’ is referred to, in phrases such as ‘views of the Converter Station’ or ‘distance from the Converter Station’ that refers, respectively, to whichever of Options B(i) and B(ii) would be more visible or is the nearest.”</i></p> <p>With respect to construction impacts, paragraph 15.8.3.5 states:</p>

Document	Confirmation of whether ES remains valid and why
	<p><i>“The Proposed Development would give rise to noticeable changes in the landform and land-use of the Converter Station Area, and it would lead to noticeable loss of vegetation including woodland and hedgerows. Locally this would result in the following effects:</i></p> <ul style="list-style-type: none"> <li>• <i>Landform: Direct, moderate adverse permanent long-term (significant) effect.</i></li> <li>• <i>Land-use: Direct, moderate adverse temporary short-term (significant) effect.</i></li> <li>• <i>Planting (existing planting):</i> <ul style="list-style-type: none"> <li>○ <i>Direct, moderate-major adverse permanent long-term (significant) effect for Option B(i), or</i></li> <li>○ <i>Direct, moderate adverse permanent medium-term (significant) effect for Option B(ii).”</i></li> </ul> </li> </ul> <p>With the omission of Option B(i) the greater possible effect on existing planting - <b>direct moderate-major adverse permanent long term (significant)</b> would no longer subsist. The effect in relation to the landscape impacts of the loss of vegetation would be the lesser effect - <b>direct, moderate adverse permanent medium term (significant)</b>.</p> <p>With respect to operational impacts on landscape features, paragraph 15.8.4.8 states:</p> <p><i>“In year 0 after construction activities, and on commencement of the proposed development, there would continue to be noticeable changes in the landform of the Converter Station and the loss of vegetation would still be apparent following the implementation of mitigation measures. Locally this would result in the following effects, all of which are permanent and localised:</i></p> <ul style="list-style-type: none"> <li>• <i>Landform: Direct moderate adverse long-term (significant) effect.</i></li> <li>• <i>Planting (existing and mitigation planting):</i> <ul style="list-style-type: none"> <li>○ <i>Option B(i) Direct moderate-major adverse long-term (significant) effect.</i></li> <li>○ <i>Option B(ii) Direct moderate adverse medium-term (significant) effect.”</i></li> </ul> </li> </ul> <p>With the omission of Option B(i) the greater possible effect on existing planting - <b>direct moderate-major adverse long term (significant)</b> would no longer subsist. The effect in relation to the landscape impacts of the loss of vegetation would be the lesser effect - <b>direct moderate adverse permanent medium term (significant)</b>.</p> <p>As such, the findings and residual effects reported in the Landscape and Visual Amenity assessment Chapter 15 of the ES (APP-130) and section 9.3 of the ES Addendum (REP1-139) remain as reported for Option B(ii).</p>

Document	Confirmation of whether ES remains valid and why
<p><b>Chapter 16 (Onshore Ecology) (APP-131)</b></p>	<p>The Onshore Ecology assessment considered the full extent of the Converter Station footprints for both options, in order to ensure that an assessment of the worst-case could be considered. This approach was applied when considering impacts to protected species, namely badger, bats and breeding birds which are the ecology values of most concern at the Converter Station.</p> <p><b>Badger</b></p> <p>At paragraph 16.6.1.21, it is stated that <i>“Direct impacts of the Proposed Development through loss and/or degradation of habitats according to Option B(i) of the Converter Station will lead to the loss of two badger setts, an annexe and an outlier. The siting of the Converter Station option B(i) will therefore place badgers at risk of death or injury in the absence of mitigation. Option B(ii) is to the east of Option B(i) and would lead to disturbance of the setts, but they would not be lost. The worst-case scenario has been assessed here, Option B(i).”</i></p> <p>Mitigation was proposed to address the Option B(i) impacts, therefore the conclusion on likely significant effects was negligible and not significant. For Option B(ii) whilst badger setts would not be lost, they would still be disturbed and this conclusion will not change. For Option B(ii) embedded mitigation outlined in paragraph 16.6.1.44 of Chapter 16 (Onshore Ecology) (APP-131) of the ES applies and the conclusion of negligible effects will not change.</p> <p>The ES states that Badger setts to be lost to the Converter Station Area footprint (Option B(i)) will be closed using badger gates outside of the badger breeding season (paragraph 16.8.7.1). Closure of badger setts would not be needed for Option B(ii) as no setts are required to be closed where Option B(ii) is sited.</p> <p><b>Bats</b></p> <p>At paragraph 16.6.1.27, it is stated that: <i>“Bats would be affected by the loss of hedgerows and trees at the Converter Station Area as they use these features to commuting between foraging areas and roosting sites, and removal of such features affects the ability of bats to feed and find places of rest or shelter (Collins, 2016). Survey work showed that species of bat use the species-rich hedgerows found at the Converter Station Area for these purposes (Appendix 16.8). Option B(i) leads to the removal of two hedgerows, one providing connectivity north to south found along the western edge of the Converter Station footprint, and the second west-east connectivity that</i></p>

Document	Confirmation of whether ES remains valid and why
	<p><i>crosses the footprint. Option B(ii) is positioned approximately 35 m to the east of Option B(i) and retains the north south hedgerow".</i></p> <p>The difference between the two options is that under Option B(ii) the north-south hedgerow will be retained, but under Option B(i) it will be lost. Mitigation was proposed to address the Option B(i) impacts so the conclusion on the likely significant effects was negligible and not significant.</p> <p>Whilst that conclusion will not change, it should be noted that this hedgerow would no longer be directly impacted by the Converter Station under Option B(ii).</p> <p><b>Breeding Birds</b></p> <p>At paragraph 16.6.1.36, it is stated that: <i>"The loss of hedgerow habitat associated with option B(i) of the Converter Station will temporarily reduce the quantity of breeding bird habitat within the Order Limits although it is considered that landscape planting within the embedded measures will more than offset this loss."</i></p> <p>This loss of hedgerow would no longer occur with Option B(ii) and there is therefore no impact. It should be noted that the assessment concluded that impacts on breeding birds were negligible and therefore no significant effects anticipated.</p>
<p><b>Chapter 17 (Soils and Agricultural Land Use) (APP-132)</b></p>	<p>With regard to the removal of Option B(i), the impacts of the Converter Station on Soils and Agricultural Land Use remain unchanged in the ES as the Converter Station would still be sited on land classified as Subgrade 3b and Grade 4.</p> <p>Paragraph 17.6.2.5 states that: <i>"the Converter Station will be sited on land classified as Subgrade 3b and Grade 4, and there is no difference in the impacts on agricultural land quality, soils or farm holdings from Converter Station Options B(i) and B(ii). Approximately 5 ha of BMV land in Subgrade 3a will be required for the Access Road and landscape planting to the south of the Converter Station."</i></p> <p>There is therefore no change to the soils and agricultural land use assessment, and the conclusions of the soils and agricultural land use assessment reported in Chapter 17 (Soils and Agricultural Land Use) (APP-132) of the ES remains valid.</p>

Document	Confirmation of whether ES remains valid and why
<b>Chapter 18 (Ground Conditions) (APP- 133)</b>	<p>With regard to the removal of Option B(i), the reported effects of the Converter Station on ground conditions remain unchanged, as the predicted effects were assessed for the Converter Station Area as a whole.</p> <p>Therefore, the assessment of ground conditions reported in Chapter 18 (Ground Conditions) (APP-133) of the ES remains valid.</p>
<b>Chapter 19 (Groundwater) (APP-134)</b>	<p>With regard to the removal of Option B(i), the reported effects of the Converter Station on groundwater remain unchanged, as the predicted effects were assessed for the Converter Station Area as a whole.</p> <p>Therefore, the assessment of groundwater reported in Chapter 19 (Groundwater) (APP-134) of the ES remains valid.</p>
<b>Chapter 20 (Surface Water Resources and Flood Risk) (APP- 135)</b>	<p>With regard to the removal of Option B(i), the reported effects of the Converter Station on surface water resources and flood risk remain unchanged, as the predicted effects were assessed for the Converter Station Area as a whole.</p> <p>The assessment of surface water resources and flood risk, as reported in 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 valid.</p>
<b>Chapter 21 (Heritage and Archaeology) (APP-136)</b>	<p>With regard to the removal of Option B(i), the reported effects of the Converter Station on heritage and archaeology resources remain unchanged, as the predicted impacts were assessed for the Converter Station Area as a whole. It is stated at paragraph 21.6.2.7 that the magnitude of change on above-ground built heritage has been assessed as small for both options and neither are considered to be of great impact in terms of impact to designated heritage assets through changes to setting. The magnitude of change on potential below-ground heritage assets within the footprint of the proposed Converter Station is assessed as large (see paragraph 21.6.2.10) and this would be unchanged following removal of Option B(i).</p>

Document	Confirmation of whether ES remains valid and why
	The assessment of heritage and archaeology effects as reported in Chapter 21 (Heritage and Archaeology) of the ES (APP-136) remains valid.
<b>Chapter 22 (Traffic and Transport) (APP-137)</b>	<p>With regard to the removal of Option B(i), the reported effects of the Converter Station on traffic and transport remain unchanged, as the predicted effects were assessed for traffic at the Converter Station Area as a whole.</p> <p>The assessment of traffic and transport reported in Chapter 22 (Traffic and Transport) (APP-137) of the ES and Chapter 15 of the ES Addendum (REP1-139) remains valid.</p>
<b>Chapter 23 Air Quality (REP1-033)</b>	<p>With regard to the removal of Option B(i), the reported effects of the Converter Station on air quality remain unchanged, as the predicted effects were assessed for the Converter Station Area as a whole.</p> <p>Therefore, the conclusions of the air quality assessment reported in Chapter 23 (Air Quality) (REP1-033) of the ES remains valid.</p>
<b>Chapter 24 Noise and Vibration (APP-139)</b>	<p>A computerised 3D acoustic model of the Converter Station (both Options B(i) and B(ii)), the Telecommunications Buildings and surrounding landscape was produced to predict the likely noise levels at the sensitive receptors within the study area. Options B(i) and B(ii) refer to the two potential Converter Station locations within the Order limits. The predicted noise levels at sensitive receptors for Options B(i) and B(ii) were compared to determine which is considered the 'worst-case'. This enables the results for a single option to be presented.</p> <p>In relation to broadband noise prior to mitigation, paragraph 24.6.2.16 states that:</p> <p><i>"Operational noise levels from Option B (i) are higher at seven receptors, whereas noise levels from Option B (ii) are higher at six receptors. However, overall, Option B (ii) is considered to be the worst case. The primary justification is that all receptors are predicted to experience negligible impacts based on Option B (i), whereas a single receptor is predicted to experience a small adverse impact based on Option B (ii). Whilst a worst-case has been determined, it should be noted that the variation in noise level between each option is relatively small (<math>\pm 0.6</math> dB at any receptor)".</i></p> <p>As Option B(ii) was identified as the worst case, the conclusions would not change were Option B(i) to be removed.</p>

Document	Confirmation of whether ES remains valid and why
	<p>The Design and Access Statement (REP8-012) includes an explanation of the noise mitigation measures that have been integrated into the design of the Converter Station. As a result of the proposed mitigation, the effect of broadband noise at Hinton Daubnay (i.e. the receptor where a small adverse impact was predicted) is expected to reduce from minor adverse (potentially significant) to direct, permanent, long-term, negligible (not significant).</p> <p>In relation to octave band noise, paragraphs 24.6.2.20 to 24.6.2.24 of ES Chapter 24 (Noise and Vibration) state that direct, permanent, long-term negligible (not significant) effects are anticipated for both options of the Converter Station during the daytime and night-time. These predicted effects remained valid in the addendum to ES Chapter 24 (Noise and Vibration).</p> <p>As Option B(ii) was identified as the worst case, the conclusions therefore will not change and Option B(ii) is anticipated to result in a negligible change in noise levels, with mitigation, at the nearby noise sensitive receptors.</p>
<b>Chapter 25 Socio-economics (APP-140)</b>	<p>With regard to the removal of Option B(i), the reported effects of the Converter Station on socio-economic receptors remain unchanged, as the predicted effects were assessed for the Converter Station Area as a whole.</p> <p>Therefore, the assessment of socio-economics reported in Chapter 25 (Socio-economics) (APP-140) of the ES remains valid.</p>
<b>Chapter 26 Human Health (APP-141)</b>	<p>With regard to the removal of Option B(i), the reported effects of the Converter Station on human health remain unchanged, as the predicted effects were assessed for the Converter Station Area as a whole.</p> <p>Therefore, the assessment on human health reported in section 26.6.3 of Chapter 26 (Human Health) (APP-141) of the ES is unchanged and remains valid.</p>
<b>Chapter 27 Waste and Material Resources (APP-142)</b>	<p>With regard to the removal of Option B(i), the reported effects of the Converter Station on waste and material resources remain unchanged, as the predicted effects were assessed for the Converter Station Area as a whole.</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>

Document	Confirmation of whether ES remains valid and why
<p><b>Chapter 28 Carbon and Climate Change (APP-143)</b></p>	<p>With regard to the removal of Option B(i), the reported effects of the Converter Station on greenhouse gas emissions and climate resilience remain unchanged, as the predicted effects were assessed for the Converter Station Area as a whole.</p> <p>Therefore, the assessment of carbon and climate resilience related-effects, as reported in section 28.12 of Chapter 28 (Carbon and Climate Change) (APP-143) of the ES, is unchanged and remains valid.</p>

