STRICTLY PRIVATE AND CONFIDENTIAL

NeuConnect

ENVIRONMENTAL STATEMENT VOL 4 – APPENDICES 3 AND 5 - 5471141

NEU-ACM-CON-UK-AP-PN-0015

ASITE DOCUMENT NUMBER

Revision Tracking

Revision No.	Revision Date	Author	Checked By	Approver	Revision Notes
P01	16/04/2021	AECOM		NeuConnect	

Originator's Reference:	ITT Reference Number:
N/A	

NeuConnect: Great Britain to Germany Interconnector

GB Onshore Scheme

Environmental Statement
Volume IV: Technical Appendices

NeuConnect Britain Ltd

September 2019

Prepared for:

NeuConnect Britain Ltd
105 Piccadilly
London, W1J 7NJ
United Kingdom

Prepared by:

AECOM Infrastructure & Environment UK Limited
1 Tanfield
Edinburgh EH3 5DA
United Kingdom

T: +44 131 301 8600
aecom.com

Table of Contents

Figures

No table of figures entries found.

Tables

No table of figures entries found.

Introduction

ES Vol II - Chapter	Appendix Number	Title
03 Approach to Assessment	3.A	Screening Responses
	3.B	Statement of Community Involvement
05 Landscape and Visual	5.A	Landscape Assessment
	5.B	Visual Assessment
06 Ecology and Nature Conservation	6.A	Preliminary Ecological Appraisal
	6.B	Report on Surveys of Breeding Birds
	6.C	Report on Surveys of Wintering Birds
	6.D	Report on Surveys for Intertidal Waterbirds
	6.E	Report on Surveys for Reptiles
	6.F	Report on Surveys for Great Crested Newts
	6.G	Report on Surveys for Water Vole
	6.H	Aquatic Ecology Report
	6.I	Report on Survey for Bats
	6.J	Benthic Characterisation Survey
07 Noise and Vibration	7.A	Baseline Survey
	7.B	Monitoring Information
08 Cultural Heritage	8.A	Desk-Based Assessment
09 Water Resources and Flood Risk	9.A	Flood Risk Assessment Report
	9.B	Drainage Strategy
	9.C	Hydrology
10 Transport	10.A	Traffic Scenario
11 Ground Conditions	11.A	Environmental Liability Desk Study
	11.B	Contaminated Land Assessment Methodology, Risk and Impact Assessment

Appendix 3.A Screening Responses

Decision Notice

MC/18/3363

Medway Council
Serving You

Mr T Cramond
AECOM
AECOM Limited
One Trinity Gardens
First Floor
Quayside
Newcastle-upon-Tyne
NE1 2HF

Applicant Name:
NeuConnect Britain Limited

Planning Service
Physical & Cultural Regeneration
Regeneration, Culture, Environment & Transformation
Gun Wharf
Dock Road
Chatham
Kent
ME4 4TR
01634 331700
01634 331195
Planning.representations@medway.gov.uk

TOWN & COUNTRY PLANNING ACT 1990
Town & Country Planning (Environmental Impact Assessment) Regulations 2017.

Location: Land At Grain, Isle Of Grain , Kent , ,

Proposal: Town and Country Planning Act (Environmental Impact Assessment) (England and Wales) Regulations 2017 request for a screening opinion for the proposed development of a coverter station, substation and underground Direct Current electricity cables on land at Grain, Isle of Grain

---

Take Notice that the Medway Council in pursuance of its powers under the above Act HAS DETERMINED THAT AN ENVIRONMENTAL IMPACT ASSESSMENT IS NECESSARY for the development as described above in accordance with your request for a Screening Opinion received complete on the 21 November 2018.

For the following reasons:

1 The proposed development has been assessed against the criteria in Schedule 2 to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. It is considered that an EIA is required as the proposed development as it is located in close proximity to sensitive areas and could result in significant impacts on the environment and the impacts that may arise should be addressed by the formal submission of an ES.

Your attention is drawn to the following informative(s) :-

1 This decision relates to the letter (dated 20 Nov 2018) requesting a screening opinion, the AECOM - Screening Report (dated November 2018).

David Harris
Head of Planning
Date of Notice 19 December 2018

TOWN & COUNTRY PLANNING (APPEALS) (WRITTEN REPRESENTATIONS) (ENGLAND) (AMENDMENT) (REGULATIONS 2013)

TOWN AND COUNTRY PLANNING ACT 1990

Appeals to the Secretary of State

- If you are aggrieved by the decision of your Local Planning Authority to refuse permission for the proposed development or to grant it subject to conditions, then you can appeal to the Secretary of State under section 78 of the Town and Country Planning Act 1990.

- If you want to appeal against your Local Planning Authority's decision then you must do so within **12 weeks** from the date of this notice for appeals being decided under the **Commercial Appeals Service** and **6 months** from the date of this notice for all other **minor and major applications.**

    - However, if an enforcement notice has been served for the same or very similar development within the previous 2 years, the time limit is:
    - **28 days** from the date of the LPA decision if the enforcement notice was served before the decision was made yet not longer than 2 years before the application was made.
    - **28 days** from the date the enforcement notice was served if served on or after the date the decision was made (unless this extends the appeal period beyond 6 months).
    - Appeals must be made using a form which you can obtain from the Planning Inspectorate by contacting Customer Support Team on 0303 444 50 00 or to submit electronically via the Planning Portal at

    https://www.planningportal.co.uk/info/200207/appeals/110/making_an_appeal

Commercial Appeals Service

- This type of appeal proceeds by way of written representations, known as the "Commercial Appeals Service". Third parties will not have the opportunity to make further representations to the Planning Inspectorate on these.

All other Minor and Major Applications

- The Secretary of State can allow a longer period for giving notice of an appeal, but he will not normally be prepared to use this power unless there are special circumstances which excuse the delay in giving notice of appeal.

- The Secretary of State need not consider an appeal if it seems to him that the Local Planning Authority could not have granted planning permission for the

proposed development or could not have granted it without the conditions they imposed, having regard to the statutory requirements, to the provisions of any development order and to any directions given under a development order.

- In practice, the Secretary of State does not refuse to consider appeals solely because the Local Planning Authority based on their decision on a direction given by him.

Purchase Notes

- If either the Local Planning Authority or the Secretary of State refuses permission to development land or grants it subject to conditions, the owner may claim that he can neither put the land to a reasonably beneficial use in its existing state nor render the land capable of a reasonably beneficial use by the carrying out of any development which has been or would be permitted.

- In these circumstances, the owner may serve a purchase notice on the Council (District Council, London Borough Council or Common Council of the City of London) in whose area the land is situated. This notice will require the Council to purchase his interest in the land in accordance with the provisions of Part VI of the Town and Country Planning Act 1990.

Date: 13 December 2018
Our ref: 266421
Your ref: MC/18/3363

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Hannah Gunner
Medway Council - Planning Service
Physical & Cultural Regeneration
Regeneration, Culture, Environment & Transformation
Civic Headquarters
Gun Wharf
Dock Road
Chatham ME4 4TR

BY EMAIL ONLY

Dear Hannah Gunner

Screening consultation: Town and Country Planning Act (Environmental ImpactAssessment) (England and Wales) Regulations 2017 (for the proposed development of a coverter station, substation and underground Direct Current electricity cables on land at Grain, Isle of Grain
Location: Land At Grain, Isle Of Grain , Kent.

Thank you for your consultation on the above dated 28 November 2018 which was received by Natural England on the same date.

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

There is no formal requirement of an Environmental Impact Assessment (EIA) for the proposed development under Schedule 2 or 3 of the Town & Country Planning (Environmental Impact Regulations) 2011 as the proposal is for the conduction, and not the production of electricity. However it would be advised that the statutory environmental evidence is presented in one consolidated document to facilitate the organisation of environmental assessments for the proposed development. A Habitats Regulations Assessment (HRA) will need to be undertaken in accordance with The Conservation of Habitats and Species Regulations 2017 and The Conservation of Offshore Marine Habitats and Species Regulations 2017. MCZ assessments will also be required under the Marine and Coastal Access Act 2009. A single consolidated environmental document would inform the Habitats Regulations Assessment as well as the Site of Special Scientific Interest (SSSI) process of the development. More detail on each topic can be provided to the applicant via their current DAS (discretionary advice service) contract, through which we have previously provided pre-application advice for this project.

Natural England has identified that the proposed location of the development would be within or adjacent (proximity of approximately 1.3km) to the following sites:

- South Thames Estuary and Marshes Site of Special Scientific Interest (SSSI)
- Medway Estuary and Marshes SSSI
- Thames Estuary and Marshes Special Protection Area (SPA)
- Medway Estuary and Marshes SPA
- Thames Estuary and Marshes Ramsar Site
- Medway Estuary and Marshes Ramsar Site

- Medway Estuary Marine Conservation Zone (MCZ)

Additionally the proposal site, as highlighted in the screening report, is also in close proximity to numerous other designated sites in the area. All of which are within 10km of the proposal site and therefore must also be considered as a route of impact on habitats and species. Furthermore the site is adjacent to an environmentally Sensitive Area known as the North Kent Marshes. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found here.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this proposal is likely to affect such populations to an extent sufficient to require an EIA. It remains the case, however, that the developer must provide information supporting this application sufficient for you to assess whether protected species are likely to be affected and, if they are, whether sufficient mitigation, avoidance or compensation measures will be put in place.

Notwithstanding this advice, Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result this application may raise environmental issues that we have not identified on local or national biodiversity action plan species and/or habitats, local wildlife sites or local landscape character that may be sufficient to warrant an EIA.

We therefore recommend that advice is sought from your own ecological and/or landscape advisers, local record centre, recording society or wildlife body on the local landscape, geodiversity and biodiversity receptors that may be affected by this development before determining whether an EIA is necessary.

Should you determine that an EIA is not required in this case, you should still ensure that the application is supported by sufficient biodiversity and landscape information in order for you to assess the weight to give these material considerations when determining the application.

Please note that Natural England reserves the right to provide further comments on this proposal beyond this EIA screening opinion, should your authority seek our views on the planning application. This includes any third party appeal against any screening decision you may make.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Lucy Crooks on 07554116046. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Lucy Crooks
Lead Advisor

Cramond, Tom

From:	bratton, paul <paul.bratton@medway.gov.uk>
Sent:	05 December 2018 15:41
To:	gunner, hannah
Cc:	representations, planning
Subject:	MC/18/3363 - Screening Opinion

Hi Hannah,

MC/18/3363 – Land at Grain

A full Landscape Visual Impact Assessment should be included as part of the EIA for this application.

- Clarification on the justification of location is needed.
- The development is not located within the industrial infrastructure envelope and is instead situated isolated, away from the developed edge.
- The application should consider the most appropriate location for development, being sensitive to minimise upon its impact on the landscape and any encroachment on the countryside. Consideration for the proposed development location should give as much importance on impact upon landscape character, as any importance on the proposal's visual impact.

- The Medway Landscape Character Assessment states:
  Landscape Character Area 3: Allhallows to Stoke Marshes:
  - Characteristics: Open, flat and expansive marshland landscape with big skies and wide views.
  - Guidelines: Ensure new development proposals respect open, remote character of marshland landscape and minimise visual intrusiveness; mitigation of impacts should be sought primarily through careful design and siting; planting and earth binding as secondary mechanisms; introducing extensive areas of planting (even using water tolerant species) would not generally be considered suitable to character of open marshland.

Paul Bratton | Landscape Officer
Medway Council, Planning Department, Gun Wharf, Dock Road, Chatham, ME4 4TR
Direct dial: 01634 333734 | Email: paul.bratton@medway.gov.uk

Cramond, Tom

From:	steed, stuart <stuart.steed@medway.gov.uk>
Sent:	14 December 2018 12:03
To:	gunner, hannah
Cc:	representations, planning
Subject:	MC/18/3363 Land at Grain, Isle of Grain

Hi Hannah,

I have reviewed the application for a an EIA scoping opinion.

My colleague Eric Lawson has already reviewed with respect to potential contamination issues.

I am happy with the proposed scope of the EIA with respect to air quality and noise.

There are likely to be construction and operational phase noise. Due to the long duration of the project I recommend that a construction phase noise assessment is carried out, and this should inform the scope of a Construction Environmental Management Plan (CEMP) and so set construction noise limits at representative noise sensitive receptors. The most appropriate standard for assessing the construction phase noise, and setting suitable noise limits and best practice controls and mitigation measures for this phase is BS5228.

The operational phase noise assessment should refer to applicable standards and guidelines (for example BS4142:2014) and particular attention needs to be taken to the consideration of low frequency sound. It may be beneficial to seek the advice of UK Power Networks on the suitable assessment of low frequency sound from these types of installations.

The noise assessments should be submitted with the application, however the CEMP can be included as a condition on any permission.

There are unlikely to be any operational air quality impacts associated with the development, however, like noise, there are likely to be construction phase impacts associated with emissions of fugitive dust (and other construction related emissions). I am satisfied with the proposed approach to include mitigation in accordance with the Institute of Air Quality Management guidance, which is a requirement of the Medway Air Quality Planning Guidance. The mitigation shall be included in the CEMP.

Regards,

Stuart.

Stuart Steed
Environmental Protection Officer
Medway Council
Gun Wharf
Dock Road
Chatham
Kent
ME4 4TR
Tel: 01634 331105
email: stuart.steed@medway.gov.uk

Cramond, Tom

From:	lawson, eric <eric.lawson@medway.gov.uk>
Sent:	05 December 2018 11:54
To:	gunner, hannah
Cc:	representations, planning
Subject:	MC/18/3363 - Land At Grain Isle Of Grain Kent

Hi Hannah

Town and Country Planning Act (Environmental Impact Assessment) (England and Wales) Regulations 2017 request for a screening opinion for the proposed development of a converter station, substation and underground Direct Current electricity cables on land at Grain, Isle of Grain

Further to your memo of 28 November 2018 regarding the above application I have now had the opportunity to review the EIA Scoping Report submitted in support of the application. I note that land contamination, noise and air quality are likely to be issues and these have been commented on in the report. The issues can be dealt with through conditions when a full application is received with more details of the proposed development. I will pass the application to Stuart Steed to comment further on air quality and noise issues.

Regards

Eric

Eric Lawson
Environmental Protection Officer
Environmental Health
Medway Council
Gun Wharf
Dock Road
Chatham
Kent ME4 4TR
email: eric.lawson@medway.gov.uk
Tel.: 01634 336627

Recommendation

EIA Not Required

Representations

The **Environment Agency, Natural England, KKC Archaeology and KCC Ecology have** been consulted. Internal consultees include Landscaping, Flood and Drainage, Environmental Protection, and Integrated Transport. As this is an application for a screening opinion, no neighbour consultations have been carried out.

Their comments are summarised below:

Natural England have advised that the statutory environmental evidence is presented in one consolidated document to facilitate the organisation of environmental assessments for the proposed development. A Habitats Regulations Assessment (HRA) will need to be undertaken in accordance with The Conservation of Habitats and Species Regulations 2017 and The Conservation of Offshore Marine Habitats and Species Regulations 2017. MCZ assessments will also be required under the Marine and Coastal Access Act 2009. A single consolidated environmental document would inform the Habitats Regulations Assessment as well as the Site of Special Scientific Interest (SSSI) process of the development. More detail on each topic can be provided to the applicant via their current DAS (discretionary advice service) contract, through which we have previously provided pre-application advice for this project.

Should you determine that an EIA is not required in this case, you should still ensure that the application is supported by sufficient biodiversity and landscape information in order for you to assess the weight to give these material considerations when determining the application

The ***Environment Agency*** have stated that they no longer make representations on screening opinion applications.

KCC Ecology have reviewed the submitted information in regards to determining if an ecological impact assessment (EcIA) will need to be carried out and advise that for this development, in terms of ecological impact, there are likely to be significant impacts. Therefore, an EIA for Ecology is required.

The Thames Estuary and Marshes SPA and Ramsar and the South Thames Estuary and Marshes SSSI is within 150m of the project area (where the substation will be located) and the cables will run directly through the designated sites. Therefore it is advised that the proposed development is likely to have a significant impact on biodiversity (both direct and indirect) and based on the above conclusion KCC Ecology advice that for this development an EIA for Ecology is required.

The submitted information has detailed that a range of ecological surveys are currently on going and the results of these surveys must inform the Environmental Statement. We

highlight that there has been a number of projects within Kent which have resulted in direct impacts to the mud flats through the installation of cables – they recommend that the results of the on-going monitoring from these projects are gathered to help inform the impact assessments and mitigation strategies.

KCC Archaeology have stated that the proposed development has the potential to impact a range of heritage assets including non-designated archaeological remains as well as designated assets (listed anti-invasion defences). It should be remembered that not all nationally important archaeological remains will be designated, either because their character is such that designation would not be appropriate or because their significance is not yet understood. The site in question lies in an area where archaeological remains of at least regional importance are already known, and there is the potential for further remains of similar or greater importance to be present within the proposed development area.

If the Council determine that EIA should be undertaken (either through the regulations or on a voluntary basis), then it is suggested any future ES should include a section on Archaeology and Cultural Heritage. If EIA is not required, then a comprehensive suite of information should still be required to support any future planning application, and KCC Arch. have confirmed that they would be pleased to engage with the applicant to ensure agree an appropriate programme of archaeological assessment.

Environmental Protection have confirmed that they are happy with the scope of works in relation to air quality and noise. It is also suggested that a construction phase noise assessment is carried out.

Flood and Drainage have no comment at this stage

Landscaping have confirmed that a full Landscape Visual Impact Assessment should be included as part of the EIA for this application.

- Clarification on the justification of location is needed.
- The development is not located within the industrial infrastructure envelope and is instead situated isolated, away from the developed edge.
- The application should consider the most appropriate location for development, being sensitive to minimise upon its impact on the landscape and any encroachment on the countryside. Consideration for the proposed development location should give as much importance on impact upon landscape character, as any importance on the proposal's visual impact.

The Medway Landscape Character Assessment states:
Landscape Character Area 3: Allhallows to Stoke Marshes:

- Characteristics: Open, flat and expansive marshland landscape with big skies and wide views.
- Guidelines: Ensure new development proposals respect open, remote character of marshland landscape and minimise visual intrusiveness; mitigation of impacts should be sought primarily through careful design and siting; planting and earth

binding as secondary mechanisms; introducing extensive areas of planting (even using water tolerant species) would not generally be considered suitable to character of open marshland.

Appraisal

EIA ANALYSIS AND SCREENING PROFORMA

1	Case details	
a	LPA case reference	
	MC/18/3363	
b	Site address	
	Land at Grain, Isle of Grain, Kent	
c	Brief description of development	
	Electricity converter station, substation and underground cables	
d	Is the request related to reserved matters?	
	Yes	
	No	*
	Is the request related to conditions	
	Yes	
	No	*
	If YES, enter the description of development subject of the related planning permission	
e	Area of development/works/new floorspace (not site area)	
	69700m² (6.97 hectares)	
2	EIA details	
A	Schedule 1	
(i)	Is the proposed development Schedule 1 development as described in Schedule 1 of the EIA Regulations?	
	Yes	
	No	*
(ii)	If YES, under which description of development i.e. No's 1 - 24?	
B	Schedule 2	
(i)	Is the proposed development Schedule 2 development as described in Column 1 of Schedule 2 of the EIA Regulations?	
	Yes	

	No	*
(ii)	If YES, under which description of the development in Column 1 i.e. No's 1 - 13?	
(iii)	Are the applicable thresholds/criteria in Column 2 of Schedule 2 of the EIA Regulations exceeded/met?	
	Yes	
	No	*
(iv)	If YES, which applicable threshold/criteria?	
(v)	Is the development within, partly within, or near a 'sensitive area' as defined by Regulation 2(1) of the EIA Regulations?	
	Yes	
	No	*
(vi)	If YES, Which area?	
3	Environmental Statement (ES)	
	Has the applicant supplied an ES for a current or previous (if reserved matters or conditions) application?	
	Yes	
	No	*

B. CONCLUSIONS		
i	Schedule and category of development	
	Does not fall into any.	
ii	Summary of features of project and of its location	
	a	Characteristics of development
		Industrial – converter and substation
	b	Location of development
		Land at Grain (nr Perry's Farm), Isle of Grain
	c	Characteristics of the potential impact
		Grain is located close to SSSI, AONB and Conservation Park – but not within any
iii	If a Screening Opinion (SO) has been provided - do you agree with it?	
	Yes	*
	No	
iv	Is an ES required?	
	Yes	
	No	*

SCREENING DECISION		
ASSESSMENT		Tick appropriate box
Schedule 1 development	ES required	No
Schedule 2 development - threshold exceeded, criterion met, within sensitive area and likely to have significant effects on the environment	ES required	No
Schedule 2 development - threshold exceeded, criterion met, within sensitive area and not likely to have significant effects on the environment	ES not required	No
Schedule 2 development - threshold exceeded, criterion met, not within sensitive area and likely to have significant effects on the environment	ES Required	No
Schedule 2 development - threshold exceeded, criterion met, not within sensitive area and not likely to have significant effects on the environment	ES not required	No
Schedule 2 development - threshold not met/not exceeded, criterion not met but within sensitive area likely to have significant effects on the environment	ES required	No
Schedule 2 development - threshold not met/not exceeded, criterion not met but within sensitive area not likely to have significant effects on the environment	ES not required	No
Schedule 2 development - threshold not met/but not exceeded, criterion not met, not within sensitive area not likely to have significant effects on the environment	ES not required	No

Recommended technical reports to accompany a subsequent planning application:

- Full Ecological and Biodiversity assessment
- Archaeological and Cultural Heritage Report
- Landscape Visual Impact Assessment
- Full Noise and Air Quality
- Transport Assessment
- Flood Risk report

See draft decision notice

ECOLOGICAL ADVICE SERVICE

TO: ***Hannah Gunner***

FROM: ***Helen Forster***

DATE: ***17 December 2018***

SUBJECT: ***MC/18/3363 Land At Grain, Isle Of Grain***

The following is provided by Kent County Council's Ecological Advice Service (EAS) for Local Planning Authorities. It is independent, professional advice and is not a comment/position on the application from the County Council. It is intended to advise the relevant planning officer(s) on the potential ecological impacts of the planning application; and whether sufficient and appropriate ecological information has been provided to assist in its determination. Any additional information, queries or comments on this advice that the applicant or other interested parties may have must be directed in every instance to the Planning Officer, who will seek input from the EAS where appropriate and necessary.

We have reviewed the submitted information in regards to determining if an ecological impact assessment (EcIA) will need to be carried out and we advise that for this development, in terms of ecological impact, there are likely to be significant impacts. Therefore, an EIA for Ecology is required.

Schedule 1
Under the Town and Country Planning (EIA) Regulations 2017, developments falling within Schedule 1 always require an EIA and are referred to as 'Schedule 1' developments.

EIA Screening
If the development falls within the selection criteria for a 'schedule 2' development of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, then it needs to be determined whether the proposal is situated within a 'sensitive area' and/or whether it is likely to have significant effects on the environment. Sensitive areas (as identified under Section 2(1), include the following ecologically designated sites: Site of Special Scientific Interest (SSSI), European Sites (Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar Sites)). If the proposed development is located in, partly in, or has the potential to have any negative effect on these sites, then an assessment will be required. The regulations also include World Heritage Sites, schedule monuments, Areas of

Outstanding Natural Beauty (AONB) and National Parks, which are not dealt with in these comments.

To consider if the development will have significant effect on the environment, we have considered the selection criteria under 'Schedule 3' (EIA Regulations 2017).

The Thames Estuary and Marshes SPA and Ramsar and the South Thames Estuary and Marshes SSSI is within 150m of the project area (where the substation will be located) and the cables will run directly through the designated sites. Therefore we advise that the proposed development is likely to have a significant impact on biodiversity (both direct and indirect) and based on the above conclusion we advise that for this development an EIA for Ecology is required.

The submitted information has detailed that a range of ecological surveys are currently on going and the results of these surveys must inform the Environmental Statement. We highlight that there has been a number of projects within Kent which have resulted in direct impacts to the mud flats through the installation of cables – we recommend that the results of the on going monitoring from these projects are gathered to help inform the impact assessments and mitigation strategies.

If you have any queries regarding our comments, please do not hesitate to get in touch.

Helen Forster MCIEEM
Biodiversity Officer

This response was submitted following consideration of the following documents:
Screening Report; AECOM; November 18

Environment, Planning & Enforcement

Invicta House
County Hall
MAIDSTONE
ME14 1XX

Phone: 03000 413375
Ask for: Mr Ben Found
Email: ben.found@kent.gov.uk

14 December 2018

Your Ref: MC/18/3363
Our Ref: MC 18 3363 LE01

Mrs Hannah Gunner
Planning Service
Physical & Cultural Regeneration
Regeneration, Culture, Environment & Transformation
Medway Council
Gun Wharf
Dock Road
CHATHAM
ME4 4TR

SENT BY EMAIL

Re: **MC/18/3363**

Location: **Land at Grain, Isle Of Grain, Kent**

Proposal: **Town and Country Planning Act (Environmental Impact Assessment) (England and Wales) Regulations 2017 request for a screening opinion for the proposed development of a converter station, substation and underground Direct Current electricity cables on land at Grain, Isle of Grain.**

Dear Mrs Gunner

Thank you for your letter consulting us on the above EIA screening opinion request. In my advice I am focussing on the GB Onshore elements of the scheme. I would note however that the 'offshore' elements may also have an archaeological impact. Historic England provide specialist advice on marine projects to the Marine Management Organisation (MMO). You may wish to consult with Historic England on the application for a Screening Opinion as it is possible that constraints within the offshore area could affect the layout of onshore elements.

Appraisal
Electrical interconnectors and their individual components do not appear to be listed in the Schedules which describe and define what is an Environmental Impact

Assessment (EIA) development. Nevertheless, by virtue of their size and the nature of their physical impacts such works can lead to significant environmental effects.

In my advice below I intend to comment on the scheme's effect on non-designated heritage assets of archaeological interest within the GB Onshore Scheme area and consider the effects of the proposed works on these assets. The applicant has provided their own screening assessment to consider the effects of the scheme on Cultural Heritage and Archaeology in section 4.4 of their Screening Opinion Report but, as explained below, I do not entirely agree with their assessment and would suggest that the proposed mitigation measures set out in their report are inadequate.

I would suggest the proposed development has the potential to affect the following heritage assets and/or their setting:

- Sands and gravels of Pleistocene date which could contain Palaeolithic finds;
- Holocene deposit sequences containing a wide range of palaeoenvironmental indicators;
- Possible Late Neolithic – Early Bronze age funerary monuments and features associated with the Prehistoric exploitation of the Medway Marshes;
- A major "proto-urban" Iron Age settlement site and potentially Romano-British settlement;
- Other presently unknown non-designated archaeological remains; and
- A designated (grade II listed) line of WW2 period anti-tank/anti-invasion obstacles along the foreshore.

Archaeological interest

The site is located on the Isle of Grain which occupies a strategically important position, being at the point where two major rivers, the Thames and the Medway, meet. Now forming the easternmost point of the Hoo Peninsula, the Isle of Grain, was historically separated from the 'mainland' by a navigable tidal channel. This channel has now largely been reclaimed, but the 'island' still forms an area of flat and low upstanding ground in the Medway Marshes.

The Isle of Grain probably takes its name from the Old English *greosn*, meaning gravel. Mapping of the British Geological Survey shows the geology of the island to comprise London Clay capped by superficial deposits, including Pleistocene River Terrace Gravels. Substantial tracts of Pleistocene age sand and gravel units are known from the area, including sequences buried beneath the floodplain under varying depths of more recent Holocene alluvium. Depending on the precise age of the gravel bodies, they could contain Palaeolithic artefacts, biological and palaeoenvironmental evidence.

Elsewhere on the edge of the Isle of Grain important Holocene sediment sequences have been identified at the mouth of the Medway interbedded with marine sands. These deposits include fine-grained clays, silts and sands as well as peats and have been demonstrated to contain a wide range of palaeoenvironmental indicators including pollen, foraminifera and ostracods which provide important information for the reconstruction of past landscapes.

To the immediate south of the proposed site are a cluster of ring-ditches, which may represent the plough-flattened remains of Prehistoric (Late Neolithic to Early Bronze Age) burial mounds. These features can be seen as crop-marks on aerial photographs, located on the the 'higher' gravels of the island. It is also likely that the lower lying margins of the Isle of Grain would have attracted prehistoric activity, with communities exploiting the low-lying marshlands which would have provided natural resources and foodstuffs. Elsewhere along the Thames there is evidence from a number of locations for Bronze Age trackways, constructed to provide access to the marsh.

On the high-ground, in the area of Rose Court Farm, close to the proposed site of the substation and converter station a major proto-urban settlement site has been archaeologically investigated by the Kent Archaeological Rescue Unit ahead of gravel extraction. This major settlement covered a very substantial area and contained clear evidence for salt-working/production as well as involvement in farming and fishing. It has been suggested that the site is one of the most important Iron Age settlement sites in Kent. Along with extensive Iron Age activity, the investigations at Rose Court Farm have also revealed the presence of Romano-British features and cremations as well as a third to fourth century AD cemetery containing about 60 burials. This cemetery presumably relates to a Romano-British cemetery beyond the gravel pit limits.

There is limited evidence for Anglo-Saxon activity at Grain, mostly the result of chance finds. The Church of St James, within the modern-day settlement is thought to be of Norman date and is grade I listed. The recent history of the island is dominated by defence and industry. The Isle of Grain's position at the mouth of the Thames and Medway rivers means that it has long been identified as being of strategic importance. There are a number of defensive sites, many designated, along the eastern side of the island, whilst the low-lying marshes to the north-west along the Yanklet Creek have been used by the military as a firing range.

The defensive structures at the Isle of Grain include a line of WW2-period anti-tank obstacles along the foreshore. These anti-invasion defences are very well preserved and extend for some 570m along the foreshore. They were positioned here as the beach at Grain was perceived as an attractive landing site for any enemy invasion. The obstacles are designated, being grade II listed. The proposed line of the DC cable route (as illustrated in the applicant's Screening Opinion Report) is shown as passing through the line of these designated anti-tank obstacles.

Scheme impacts

The applicant suggests in their Screening Opinion Report that the proposed converter station and substation can be positioned to avoid known archaeological features (by means of 'micro-siting') as well as when routing the proposed underground cables. However, as described above, archaeological remains are likely to be present over an extensive area. **It is possible that currently unknown archaeological remains could be present across the scheme area, potentially including remains of at least regional, if not national importance**. Given the scale of the proposed Converter Station and Substation, which are described as

extending to some 250m by 250m and 120m by 60m respectively, it is extremely unlikely that archaeological remains could be avoided through micro-siting.

Similarly, the preferred method for cable installation is described as through open-cut trenching, within a 30m wide working corridor. Again, it may not be possible to avoid archaeological remains by means of route selection/deviation. The proposed cable route must presumably pass either through or under the listed anti-invasion defences on the foreshore and could result in physical harm to these designated assets.

Table 4 of the applicant's Screening Opinion Report suggests that an archaeological watching brief will be undertaken during construction, but I would suggest that a watching brief would be wholly inadequate as mitigation for a project of this type in this location.

Recommendations

From an archaeological perspective the proposed development does not lie within a "sensitive area" (as defined under regulation 2(1)), however I would suggest that the proposed development is in a location that has high archaeological potential and could contain archaeological remains of considerable importance, possibly including nationally important archaeology. The precise significance of any archaeological remains and the magnitude of the impacts caused by the proposals has yet to be fully established, but as a result of their nature and their scale, the proposed works could have a significant impact footprint.

It is for your council to determine whether an EIA is required; the applicant has suggested in their submission that the scheme is not development of a type referred to in Schedule 1 or Schedule 2 of the EIA Regulations and therefore is not 'EIA development'. Should you agree with the applicant's interpretation of the regulations, you might want to discuss options for the production of a "voluntary Environmental Statement" to accompany any future planning application to enable the anticipated environmental effects of the proposed works to be properly assessed and appropriate mitigation measures to be determined and implemented.

If your council determines that EIA is not required, then I would suggest that detailed assessment of the scheme's effect on the historic environment should be included as part of any future planning application. Such assessment should include a comprehensive and robust archaeological desk-based assessment (including assessment of the site's Palaeolithic interest), a Heritage Statement and it is likely that pre-determination field evaluation works will also be necessary. As such the level of baseline information required to support any planning application would be equivalent to that which we would expect to be included within a formal ES chapter on cultural heritage.

Conclusion

The proposed development has the potential to impact a range of heritage assets including non-designated archaeological remains as well as designated assets (listed anti-invasion defences). It should be remembered that not all nationally important archaeological remains will be designated, either because their character

is such that designation would not be appropriate or because their significance is not yet understood. The site in question lies in an area where archaeological remains of at least regional importance are already known, and there is the potential for further remains of similar or greater importance to be present within the proposed development area.

I would suggest that the effect of the development proposals on the site's archaeological interest should be a material consideration in the determination of any future planning application. If you determine that EIA should be undertaken (either through the regulations or on a voluntary basis), then I would suggest any future ES should include a section on Archaeology and Cultural Heritage. If EIA is not required, then a comprehensive suite of information should still be required to support any future planning application, and I would be pleased to engage with the applicant to ensure agree an appropriate programme of archaeological assessment.

I trust that the above information is helpful and would be pleased to discuss further if required.

Yours sincerely

Ben Found
Senior Archaeological Officer
Heritage Conservation

Appendix 3.B – Statement of Community Involvement

September 2019

Statement of Community Involvement

NeuConnect Interconnector

Created for NeuConnect

becg.com

Contents Page

Executive Summary

NeuConnect is proposing to develop the NeuConnect Interconnector, which would create the first direct power link between Germany and Great Britain, connecting two of Europe's largest energy markets for the first time. A pair of subsea cables will form an 'invisible highway' of around 720km allowing up to 1.4GW of electricity to move in either direction, enough to power tens of millions of homes over the life of the project.

As part of the extensive community engagement programme supporting the scheme, residents and stakeholders were given the opportunity to give their feedback on the proposals at all stages of the public consultation via a number of different channels. A freephone information line, freepost address and project email address were made available throughout the course of the planning stages for interested parties to receive further information and provide their feedback to the project team, whilst the project website was live from 15th February 2017 to provide interested parties with information on the project.

Pre-application briefing meetings with stakeholders and councillors from both Medway Council and Isle of Grain Parish Council were undertaken to enable key stakeholders to view the proposals prior to them being displayed to the wider community. These meetings took place on **Monday 5th November 2018** and **Tuesday 11th December 2018.**

An initial public information event was held on **Wednesday 21st November 2018**, which introduced the emerging proposals to the local community, to which approximately 2,000 households and businesses were invited to attend. Approximately 35 people attended the event, with 30 signing in electronically via the tablets provided. This discrepancy is common, e.g. when couples/groups sign in as one entry.

Following this initial consultation, two further public consultation events were held on **Thursday 20th June 2019** and **Saturday 22nd June 2019**, to which approximately 2,000 households and businesses were invited to attend. 26 people attended the consultation events, with 25 signing in electronically via the tablets provided. Feedback forms were made available for attendees to complete, so they could offer their opinions and views on the proposals. Members of the project team were also on hand to answer questions, discuss the plans and take note of all verbal feedback received.

To ensure as many local people as possible could hear about the plans and provide their feedback, NeuConnect proactively conducted a further mailing to residents of the Isle of Grain, which included the project's information leaflet and a feedback form to enable the local community to have their say.

This mailing was followed by a community canvassing session on the High Street of Grain village on **Monday 15th July 2019**. The post-event mailing and canvassing session both helped boost engagement levels even further and generated additional feedback responses from members of the local community.

As a result of NeuConnect's early and proactive engagement, a total of 32 feedback forms were completed, with extensive verbal feedback received at the consultation events and during canvassing.

The response to the proposals has been positive: **67%** supported or had no view on the proposed converter station and substation locations, whilst **71%** supported or had no view on the onshore underground cable route. In addition, **75%** of respondents noted that they found the consultation helpful in addressing their concerns and providing answers to their queries.

Two public consultation events were held on Thursday 20th June 2019 and Saturday 22nd June 2019 at Grain Village Hall, Chapel Road, Isle of Grain.

A number of respondents provided positive comments, noting that they were in favour of the proposals, with some respondents highlighting how the project would create jobs and provide a boost for the local economy.

A number of constructive comments and suggestions were also made, including suggested visual mitigation measures to limit the impact of the converter station and ensuring deliveries of materials were only permitted during non-peak hours, with some individuals noting there is only a single highways access to and from the site.

NeuConnect has carefully reviewed all the feedback received to date and, where possible, has evolved the proposals to address the comments raised by the local community. The main comments raised by the local community have been addressed within this document and the wider material submitted as part of the planning application.

NeuConnect is committed to engaging with the local community and, following the submission of the application, will ensure that interested parties and key stakeholders remain informed and updated regarding the proposals.

This document provides a chronological account of the pre-application consultation undertaken and a review of the feedback received.

1. Introduction

1.1 NeuConnect is developing plans for NeuConnect Interconnector: the first direct power link between Germany and Great Britain, providing a dependable and resilient connection between two of Europe's largest energy markets.

1.2 NeuConnect is being developed by an international, experienced consortium that includes Meridiam, Allianz Capital Partners on behalf of Allianz Group and Kansai Electric Power, with the project also supported by Greenage Power and Frontier Power as developers. The key partners bring a proven track record in delivering large-scale energy infrastructure, creating a team with significant experience and expertise in interconnector projects.

1.3 This document has been produced with the aim of clearly and concisely highlighting the community consultation undertaken by NeuConnect in respect of its proposal for the site.

1.4 This document will provide a chronological account of the consultation activity that has been undertaken during the pre-application stages of the planning application and the activity that Seaward proposes to undertake post-application.

1.5 In order to assist with the community consultation and communication, NeuConnect appointed Built Environment Communications Group (BECG), a specialist communications consultancy, to form part of its wider project team for the proposed redevelopment.

2. Background

2.1 Proposal site

2.1.1 All British onshore elements of NeuConnect are proposed to be located on land near the north shoreline of the Isle of Grain and to the west of Grain village.

A satellite image depicting the GB onshore elements at the site on the Isle of Grain.

2.2 Proposal

2.2.1 The GB onshore elements of NeuConnect's proposals, as depicted above, include:

- A landfall location, situated on the north coastline of the Isle of Grain, where an underground Transition Joint Bay (TBJ) will be constructed to bring the offshore High Voltage Direct Current (HVDC) cables ashore;

- Underground HVDC cables running from the landfall location to the new substation and converter station;
- A new substation, to enable NeuConnect to connect to the National Grid; and
- A converter station, to convert electricity from Direct Current (DC) to Alternating Current (AC).

2.1.1 In addition to the underground cable route, some changes will need to be made to the existing pylons close to the converter station site. This may include an additional pylon close to the proposed new substation, or the relocation of the exiting pylon currently located to the west of the proposed substation and converter station.

3. Pre-application Consultation

3.1 Statement of Community Involvement

3.1.1 NeuConnect has complied with the Government's National Planning Policy Framework (NPPF) which states that "*early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties.*"

3.1.2 The NPPF also highlights that *"good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community."*

3.1.3 Medway Council formally adopted its SCI in December 2018. The pertinent section of the SCI is highlighted below:

> ***Working with developers***
>
> *3.6 Where developers are proposing major or sensitive developments, the council expects pre-application consultation and ongoing engagement. This should be carried out by developers or their agents to the standards set out in this SCI.*
>
> *3.7 The NPPF highlights the link between well-designed places and effective engagement. It states:*
>
> *"Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process".*
>
> *3.8 Applicants of major developments are expected to submit a separate Statement of Community Involvement to explain how they have built engagement into the development proposal process.*
>
> *3.9 The NPPF states: "Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot".'*

3.10 The council encourages developers to present significant development proposals to councillors at early stages in the planning process, before submitting an application. These presentations are useful in advising members about the proposals and raising key issues. The council also encourages the use of models and materials to help communicate the scope and impact of developments. These can be particularly helpful at exhibitions. Design Review Panels, run in Medway by Design South East, have a valuable use with larger or more sensitive proposals.

Encouraging early involvement with neighbours in small-scale proposals

3.11 The council encourages applicants to talk to their neighbours informally before finalising their plans and submitting their application.

3.12 There are added benefits to both local people and applicants in involving neighbours at an early stage. For applicants, it can inform them of issues that they can address prior to a planning application being submitted saving time and avoiding conflict. For neighbours, it allows them to have an input before proposals reach an advanced stage.

3.1.4 Government guidance and Medway Council's SCI encourage pre-application discussions and community involvement. As a result, the public consultation programme had a number of key objectives, including:

- To encourage as much input as possible from the local community, including residents, interest groups, councillors and businesses;
- To provide the community with a genuine opportunity to provide feedback on the plans;
- To allow people to become actively involved in the process; and
- To identify and address any issues raised by the local community and stakeholders.

3.1.5 Therefore, prior to submitting the formal planning application for the site, NeuConnect undertook a detailed programme of community consultation, as outlined in the following documentation.

3.2 Contacting Statutory Bodies

3.2.1 During the pre-application stage, NeuConnect sought engagement with all relevant statutory bodies. This included engaging in Medway Council's formal pre-application process.

3.2.2 This process was undertaken in parallel with the community engagement programme, allowing for feedback from statutory and non-statutory stakeholders to be considered and input into the final planning application, where possible.

3.3 Stakeholder Briefings (Late 2018)

3.3.1 NeuConnect felt it was important to discuss the early proposals for the project with local stakeholders in advance of the wider community consultation.

3.3.2 Therefore, NeuConnect arranged a presentation for both councillors and officers at Medway Council on **Monday 5th November 2018**.

3.3.3 The presentation included information on the following topics:

- About NeuConnect;
- Overview of the project;
- Benefits;
- GB onshore elements;
- Offshore elements;
- Project timescales;
- Public consultation; and
- Contact details.

3.3.4 In addition, NeuConnect also attended Medway Council's Rural Liaison Committee on **Tuesday 11th December 2018** and gave a presentation to both elected Medway councillors and Isle of Grain Parish Council representatives.

3.3.5 The presentation included information on the following topics:

- About NeuConnect;
- Overview of the project;
- Benefits;
- GB onshore elements;
- Offshore elements;
- Project timescales;
- Public consultation; and
- Contact details.

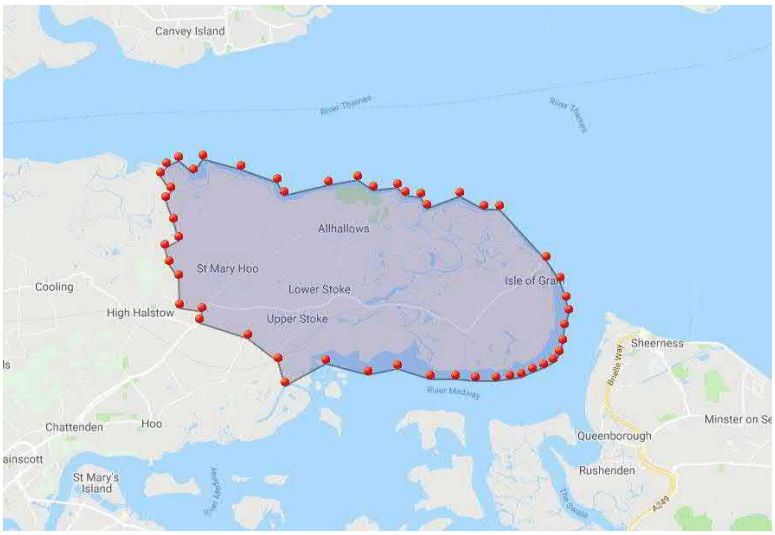
3.3.6 Both meetings also provided stakeholders with an opportunity to discuss the proposals with members of the project team and ask any questions they had with regards to the project.

3.4 Public Information Event (November 2018)

3.4.1 NeuConnect held a public information event to display its initial proposals for NeuConnect Interconnector on **Wednesday 21st November 2019** between 3.00pm and 7.00pm at Grain Village Hall, Chapel Road, Isle of Grain. A stakeholder preview was held between 2pm – 3pm, ahead of the information event for the Parish and Medway councillors, as well as interested community groups and stakeholders.

3.4.2 The purpose of the information event was to introduce the proposals to the wider community prior to conducting pre-application consultation on the proposals.

3.4.3 An invitation newsletter was distributed to 2,120 households and businesses in the local area advising them of the proposals, and the public information event. The invitations were sent to those homes and businesses thought to be most affected by the proposals within the immediate vicinity and were distributed on **Tuesday 13th November 2018**. The following map illustrates the distribution area.



A map depicting the area targeted in the information event invitation newsletter distribution area

3.4.4 The A4 invitation leaflet contained the following:

- Information about NeuConnect;
- Details of the public information event;
- An overview of the proposals;
- Background to the project;
- Benefits;
- Need for interconnectors; and
- Contact details.

3.4.5 A copy of the invitation newsletter can be found in the Appendices.

3.4.6 Copies of the invitation were also issued to a number of local stakeholders, including:

- Medway Council Cabinet members;
- Medway Council Ward Members for Peninsula;
- Local Parish Councils;
- Kelly Tolhurst MP; and
- A number of third-party groups based in the vicinity of Grain.

3.5 Media Relations

3.5.1 To further publicise the public information event, a press release was issued to the Medway Messenger. The press release contained the following information:

- Background to NeuConnect;
- Overview of the project;
- Details of the public information event;
- Project timescales; and
- Contact details.

3.5.2 Following the information event, a second press release was issued to the Medway Messenger, which contained the following information:

- Background to NeuConnect;
- Overview of the project;
- Summary of the public information event;
- Project timescales; and
- Contact details.

3.5.3 Copies of both press releases are included in the Appendices.

3.6 Information Event Display

3.6.1 The information event displayed details about the proposal ahead of submitting a planning application. The display boards included the following information:

- Background to NeuConnect;
- Overview of the project;
- Need for interconnectors;
- GB onshore elements, including:
    - Onshore cable, and potential onshore cable routes
    - Converter station and proposed converter station location at Grain
    - Proposed substation location at Grain
- Offshore elements, including:
    - Subsea cable route; and
    - Landfall location.
- Benefits;
- Onshore and offshore planning processes;
- Project timescales; and
- Contact details.

3.6.2 A copy of the display boards presented at the public information event can be found in the Appendices.

3.6.3 The following materials were also available:

- Copies of the display boards;
- Copies of the invitation newsletter;
- Copies of the information leaflet; and
- iPads, for registering attendance.

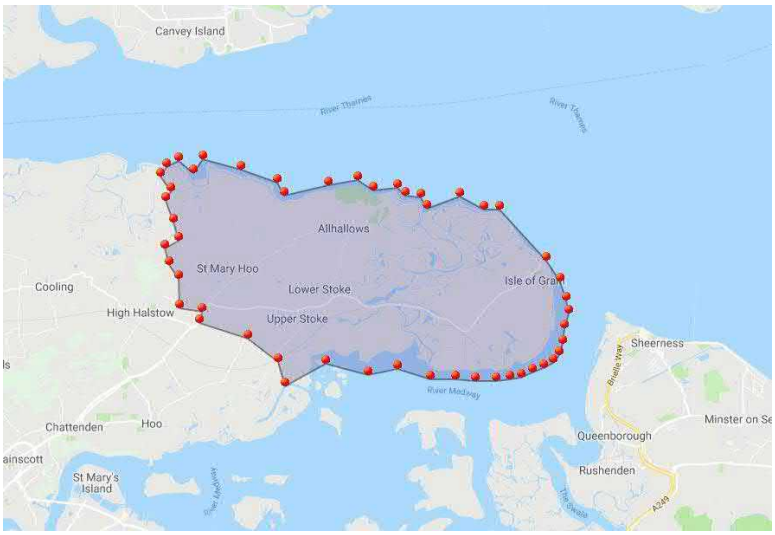
3.6.4 Representatives of the project team were available to answer questions throughout the information event, including two members of NeuConnect staff, two engineering consultants from AECOM and two consultants from BECG.

3.7 Public Consultation Events (June 2018)

3.7.1 Following the public information event, NeuConnect held two public consultation events to display its final proposals for NeuConnect Interconnector on **Thursday 20th June** 2019 between 4.00pm and 8.00pm, and on **Saturday 22nd June** between 11.00am and 4.00pm. Both events were held at Grain Village Hall, Chapel Road, Isle of Grain.

3.7.2 A stakeholder preview was held between 3.00pm and 4.00pm, ahead of the event on **Thursday 20th June 2019** for the Parish and Medway councillors, as well as interested community groups and stakeholders.

3.7.3 An invitation newsletter was distributed to 2,120 households and businesses in the local area advising them of the proposals, and the public information event. The invitations were sent to those homes and businesses thought to be most affected by the proposals within the immediate vicinity and were distributed on **Thursday 6th June**. The following map illustrates the distribution area.



A map depicting the area targeted in the public consultation invitation newsletter distribution area

3.7.4 The A4 invitation leaflet contained the following:

- Information about NeuConnect;
- Details of the public information event;
- An overview of the proposals;
- Background to the project;
- Benefits;
- Need for interconnectors; and
- Contact details.

3.7.5 A copy of the invitation newsletter can be found in the Appendices.

3.7.6 Copies of the invitation were also issued to a number of local stakeholders, including:

- Medway Council Cabinet members;
- Medway Council Ward Members for Peninsula;
- Local Parish Councils;
- Kelly Tolhurst MP; and
- A number of third-party groups based in the vicinity of Grain.

3.8 Media Relations

3.8.1 To further publicise the public information event, a press release was issued to the Medway Messenger. The press release contained the following information:

- Background to NeuConnect;
- Overview of the project;
- Details of the public consultation events;
- Benefits;
- Project timescales; and
- Contact details.

3.8.2 A copy of the press release is included in the Appendices.

3.8.3 In addition, NeuConnect placed a paid-for advert in the Medway Messenger. The advert included the following information:

- Overview of the project;
- Details of the public consultation events; and
- Contact details

3.8.4 A copy of the advert is included in the Appendices.

3.8.5 Following the information event, a second press release was issued to the Medway Messenger, which contained the following information:

- Background to NeuConnect;
- Overview of the project;
- Summary of the public consultation events;
- Summary of the feedback received;
- Project timescales; and

- Contact details.

3.8.6 A copy of the press release is included in the Appendices.

3.9 Public Consultation Display

3.9.1 The public consultation events displayed details about the proposal ahead of submitting a planning application. The display boards included the following information:

- Background to NeuConnect;
- Overview of the project;
- Need for interconnectors;
- Offshore elements, including:
    - Offshore cable route; and
    - Landfall location;
- GB onshore elements, including:
    - Onshore cable route;
    - National Grid overhead line;
    - Cable installation;
    - Converter station;
    - Substation;
    - Mitigation measures;
- Highways and environment;
- Environment & ecology works;
- Benefits;
- Project timescales; and
- Contact details.

3.9.2 A copy of the display boards presented at the public consultation events can be found in the Appendices.

3.9.3 The following materials were also available:

- Copies of the display boards;
- Copies of the invitation newsletter;
- Copies of the information leaflet;
- Feedback forms;
- iPads, for registering attendance;

- Freepost envelopes for the feedback forms; and
- A video providing an overview of the project.

3.9.4 Feedback forms could either be filled in on the project website, at the venue or posted back by using the supplied freepost envelopes. All feedback received by Friday 19th July 2019 was then collated and analysed. The original feedback deadline of Monday 8th July 2019 was extended to provide interested parties with additional time to provide their thoughts on the proposals.

3.9.5 A copy of the feedback form is included in the Appendices.

3.9.6 Representatives of the project team were available to answer questions throughout the information event, including two members of NeuConnect staff, two engineering consultants from AECOM and two consultants from BECG.

3.10 Additional Mailing and Canvassing (July 2019)

3.10.1 In order to generate additional feedback from the local community, NeuConnect sent a copy of the information leaflet, together with a copy of the feedback form and a freepost envelope to 681 households and businesses in Grain village to provide the local community with a further opportunity to comment on the proposals. The following map illustrates the distribution area:

A map depicting the area targeted in the post-consultation feedback distribution area

3.10.2 A copy of the information leaflet is available in the Appendices.

3.11 Community Canvassing Session (July 2019)

3.11.1 To ensure as many local people as possible could hear about the plans and provide their feedback, NeuConnect followed up on the public consultation events by proactively conducting a further community canvassing session on High Street, Isle of Grain on **Monday 15th July 2019**. This session helped boost engagement levels even further and generated additional feedback responses from members of the local community.

3.11.2 Following the mailing, NeuConnect conducted a community canvassing session on High Street, Isle of Grain on **Monday 15th July** between 4.30-7pm.

3.11.3 Two consultants from BECG were present on the High Street during this period to present the proposals to those who were not familiar with the project and provide the opportunity for members of the local community to provide their thoughts via a digital version of the feedback form.

3.11.4 This proactive approach was well received by the community, with many members of the public noting their appreciation for opportunity to comment on the proposals further.

3.12 Dedicated project website

3.12.1 A dedicated project website was set up to provide information about the proposals and was continuously updated throughout the public consultation process. The website is hosted at www.neuconnect.eu.

3.12.2 The website address was printed on all collateral produced as part of the public consultation process.

3.12.3 The website includes:

- Overview of the project;
- Background to NeuConnect;
- Need for interconnectors;
- Details of public consultation;
- Procurement information;
- News about the project;
- Benefits;
- Project timescales; and
- Contact details.

3.12.4 In addition to the website, NeuConnect also created a custom video for use both on the project website and at the public exhibition events, which provided information on the following topics:

- Overview of the project;
- Background to NeuConnect;
- Need for interconnectors; and
- Benefits.

Between November 2018 and up to 29th July 2019, the website was viewed by a total of 1,693 users across 2,328 sessions, with approximately 110 users visiting the site per day at its peak.

3.13 Post-paid and 0800 Comment Facility

3.13.1 During the consultation, access to a freephone telephone enquiry line was offered to those who wished to find out more about the proposals, or to register their comments via the telephone.

3.13.2 The telephone number used (0800 298 7040) was in operation Monday-Friday between the hours of 9.00am and 5.30pm. Outside of these hours a message facility was available for voicemails to be left and responded to at the earliest opportunity to ensure information was readily available and queries or concerns addressed.

3.13.3 Information was given to callers where possible and if questions were of a technical nature, these were passed on to project team members.

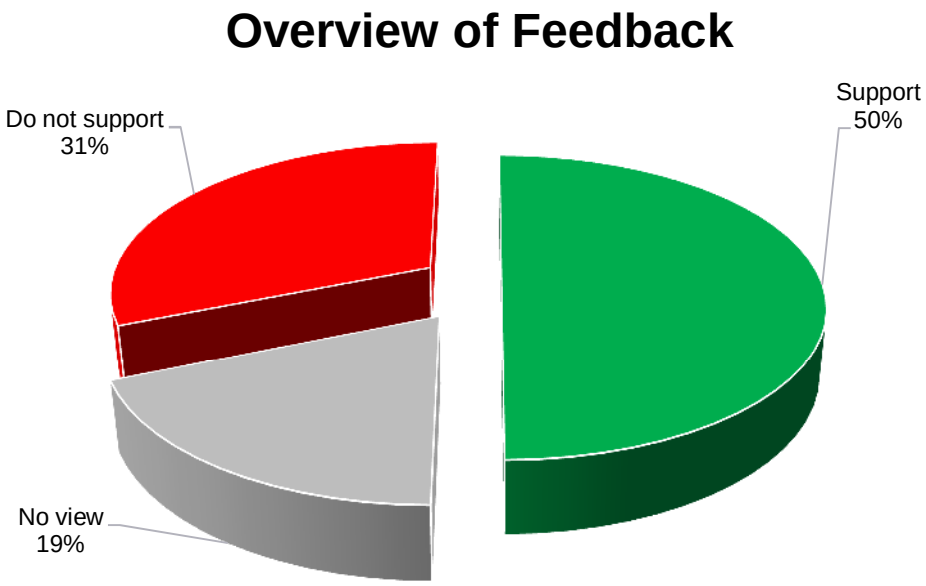
3.13.4 A freepost envelope was available (to take away) by all public consultation attendees to encourage feedback.

3.14 Review of Comments

3.14.1 The tone of the responses received to all feedback questions on forms received by Friday 19th July 2019 (including postal responses, telephone and email feedback) was as follows:

Total no. of responses	Support	No View	Oppose
32	16	6	10
-	50%	19%	31%

NB: Percentages are rounded to the nearest whole number throughout this document.



3.14.2 The tables below analyse responses to the specific questions asked on the feedback form provided at the public exhibition. A number of responses were received via the website or by post via email.

Q1. Have you found the information presented at the pubic consultation helpful in addressing concerns or questions you may have had?		
Total no. of responses	**Yes**	**No**
28	21	7
-	75%	25%

Neutral comments, questions and suggestions	Frequency
Maintain open lines of communication throughout the project	1
Was not aware of the consultation	1
Unable to attend a consultation event	1

Negative comments	Frequency
Oppose the project	1
NeuConnect has failed to consult fully with National Grid LNG	1
Lack of optioneering in relation to converter station siting	1
Inadequate consultation with Thamesport International Limited	1
No illustrations provided of the converter station	1

Q2. What are your views on the plans for the converter station and substation, and the proposed approach to landscape mitigation?			
Total no. of responses	**Support**	**No view**	**Do not support**
30	15	**5**	10
-	50%	17%	33%

Positive comments	Frequency
Converter station will not have a visual impact on the landscape	1

Neutral comments, questions and suggestions	Frequency
Minimise visual impact	3
Should be located adjacent to the BritNed converter station	2
Will visual mitigation measures be put in place?	1
Keep the area tidy	1
Why were the other cable route options discounted?	1
Need to ensure that there is no impact on the landfill site at the former BP Refinery	1

Negative comments	Frequency
Oppose converter station location	4
Oppose the project	2
Concerned about potential noise impact	2
Converter station is located too close to Grain village	1
Will have a detrimental impact on the local environment	1
Oppose the cable route	1
Converter station will remove farmland	1
Will negatively impact LNG terminal	1
Negative impact on residential properties	1

Q3. Do you agree with the approach to the onshore underground cable?			
Total no. of responses	Support	No view	Do not support
28	13	7	8
-	46%	25%	29%

Neutral comments, questions and suggestions	Frequency
Locating the converter station adjacent to the existing BritNed infrastructure would significantly reduce the length of the cable route	1

Negative comments	Frequency
Cable is too close to residential properties	2
Concerned at potential impact of EMF	1

Q4. Do you have any general comments regarding the landfall location, such as environmental considerations, timing and management plan for the works?	
Neutral comments, questions and suggestions	**Frequency**
How will local wildlife be protected?	1
Carry out work in accordance with agreed plans	1
Why not locate this adjacent to the existing BritNed Interconnector?	1
Grid connection and new substation have been dictated by National Grid	1

Negative comments	Frequency
Concerned at potential impact of EMF	1
Will have a detrimental impact on the local environment	1
Will cause disruption on Grain Road	1
Landfall should be located further down the River Medway, away from the village	1
New substation does not need to be located on the north coastline of Grain	1

Q5. To assist us in developing a traffic plan to minimise disruption during construction, are there any factors you believe we should take into consideration?	
Neutral comments, questions and suggestions	**Frequency**
Noted that there is only one access to and from Grain village	3
Place daily limits on numbers of construction vehicles	2
Large plant should be brought in via boat using Thamesport	2
Do not allow deliveries during morning and evening rush hour	2
Manage light pollution	1
Ensure construction traffic only enters and exits the site during agreed working hours	1
Address drainage issues near proposed access	1
Ensure all large loads are delivered at night	1
Maintain access to Grain village at all times	1
Provide two weeks' notice of any road closures	1
Install a lorry rejection facility to prevent lorries reversing, should they accidentally bypass the site entrance	1
Lorries must obey speed limit	1
Construction traffic unlikely to have an impact due to significant heavy vehicle movements at present	1

Negative comments	Frequency
Condition of the road surface may be worsened by construction traffic	2
Potential for additional traffic congestion/disruption	1
Grain Road is not suitable for construction traffic	1
Opposition to the project	1

Q6. Do you have any comments in regard to our plans in preparing for the environment and ecology works on site?	
Neutral comments, questions and suggestions	**Frequency**
Need to mitigate impact on the recently re-introduced reptiles in the area of the former BP refinery	2
Reinstate land to previous condition following completion of construction	1
Do not disturb wildlife during breeding season	1

Negative comments	Frequency
Will have a detrimental impact on the local environment	3
Oppose the project	1
Will have a negative visual impact	1

Q7. Do you have any further comments or questions?	
Positive comments	**Frequency**
Expressed support for the project	4
Will create jobs and boost the local economy	3
In favour of increased connectivity with European energy markets	1

Neutral comments, questions and suggestions	Frequency
Interested in job opportunities	2
Keep residents informed throughout the planning process	1
Construct breeding habitats to promote re-introduction of wildlife in the area	1
Will the substation produce any additional noise?	1
Requested financial contributions to fund local infrastructure improvements	1

Neutral comments, questions and suggestions	Frequency
Will negatively impact upon property prices	1
Oppose the project	1
Project will cause significant disruption	1
Concerned at noise impact	1
Project will have a negative visual impact	1
Increase in pollution during construction will negatively impact residents	1
NeuConnect have overlooked preferable brownfield sites for the converter station	1
Thamesport International Limited will register their objection to the planning application	1
National Grid LNG intend to object to the planning application	1

4. Response to Comments

4.1 All comments received have been reviewed by the project team and, where possible, amendments were made to the proposal. Feedback was also given at the public consultation events and questions were answered. Many of the issues raised are covered in the application documents which accompany this response.

4.2 During the consultation feedback review period, NeuConnect's project team responded directly to a number of specific enquiries and questions relating to the proposals and individual response letters were drafted and issued where appropriate.

4.3 NeuConnect is pleased to have received a significant amount of feedback on the proposals, and will continue to review these comments as it refines its proposals.

4.4 The main issues which arose during the pre-application consultation process and NeuConnect's response to each are detailed below:

- **Visual mitigation of the converter station:** A number of individuals expressed their desire to see the converter station screened adequately so as to minimise the visual impact of the building.

- **NeuConnect's response:** As part of the application, NeuConnect have considered all possible options to minimise the visual impact of the converter station and have incorporated revisions into the final design proposals.

  Measures include setting the converter and substation buildings into their dropped landscape, maximizing the screening that the current environment provide, and further planting around the site perimeter.

  The siting and orientation of the converter station within the chosen site at Grain has been selected taking into consideration the best 'fit' into the existing landscape. This includes being farthest away from the residences in Grain village and orientated so that the larger massing of buildings is located further south also.

- **Mitigation measures to combat additional noise:** Multiple respondents stated that the existing BritNed converter station produced an audible 'hum', despite being located a significant distance from Grain, and asked NeuConnect to implement measures to mitigate any additional noise from the converter station and substation.

- **NeuConnect's response:** While the substation and converter station will produce some additional noise, the audible impact upon residential properties in the respective localities at the Isle of Grain is expected to be minimal due to the significant distance between the local properties and the converter station and substation. Medway Council will set appropriate noise limits that NeuConnect will not be permitted to exceed.

  In order to meet such designated limits, NeuConnect will implement a number of measures to mitigate against the audible impact of the substation and converter station. These measures could include:

  - Use of enclosures;
  - Localised barriers; and
  - Improving the acoustic performance of the buildings to better contain the noise.

- **Traffic Management:** Several individuals noted that there is only one road access to and from Grain village and asked that this be taken into consideration when developing a Traffic Management Plan.

- **NeuConnect's response:** NeuConnect are aware of the need to ensure very robust traffic management plans are in place, and will work closely with Medway Council to establish a

Construction Management Plan which will help manage the impact of construction. The Construction Management Plan will mitigate the impact of construction traffic and sets out best practice in terms of acceptable operating hours to minimise any disruption to local residents.

- **Protecting the environment:** Several respondents noted that the local environment had been improving in recent years and requested that NeuConnect minimise the environmental impact of the project wherever possible.

- **NeuConnect's response:** As part of the application, NeuConnect has submitted an Environmental Statement (ES) to Medway Council which sets out and defines the commitments for the project to help protect the environment.

  The scope of the ES includes the following areas:

  - Ecology;
  - Landscape and visual amenity;
  - Noise;
  - Traffic and transport;
  - Water resources and flood risk;
  - Archaeology and cultural heritage; and
  - Ground conditions.

  In addition, the proposed onshore cable route has been designed to limit environmental disturbance during the installation process by following areas of existing hardstanding, whilst the area of landfill to the northeast of the converter station site has been avoided to prevent the risk of disturbance of the landfill material and the potential impacts to the environment.

5. Post-Application Consultation

5.1 On-going Stakeholder Engagement

5.1.1 Given the interest shown by residents and stakeholders, NeuConnect will ensure information continually flows through existing channels to interested parties.

5.2 Updating Materials

5.2.1 The project website, www.neuconnect.eu will be updated at key milestones throughout the application process.

5.3 Updating Materials

5.3.1 A notification will be sent to all stakeholders informing them of the application's submission.

5.3.2 NeuConnect will also update all local residents and businesses who registered an interest in the development via the project website, or acknowledged that they wished to be kept updated on the feedback forms or iPad sign-in surveys.

6. Conclusion

6.3 This Statement of Community Involvement summarises the extensive engagement activities, consultation and feedback received during the pre-application period. The Applicant has demonstrated their commitment to conduct an early and proactive programme of political and community engagement.

6.4 In addition to the public exhibitions, public information events and community canvassing sessions which have taken place over the preceding year, BECG reached out to local political stakeholders over the life of the project and have provided local people with the opportunity to feedback their ideas online, in person, through the post and over the phone.

6.5 The Public consultation events held in November 2018 and in July 2019 were underpinned by both pre-exhibition engagement and post-exhibition follow-up activities. The engagement programme has allowed the development team to gauge the local community's perception of the proposals and relay any comments or discussion points to the Applicant to review against the proposals.

6.6 The Applicant will continue to engage with stakeholders and the public to inform them about the progress of the development to seek further feedback from the community.

7. Appendices

- Copy of the information event boards;
- Copy of the information leaflet available at the information event;
- Copy of the public consultation event boards;
- Copy of the information leaflet available at the public consultation events;
- Copy of the feedback form;
- Copy of the pre-information event stakeholder letter;
- Copy of the pre-information event press release;
- Copy of the post-information event press release;
- Copy of the pre-public consultation event stakeholder letter;
- Copy of the pre-public consultation event press release;
- Copy of the pre-public consultation paper advert; and
- Copy of the post-public consultation press release.

Appendix 5.A – Landscape Assessment

NeuConnect: Great Britain to Germany Interconnector

GB Onshore Scheme

Appendix 5.A: Landscape Assessment

NeuConnect Britain Ltd

September 2019

Prepared for:

NeuConnect Britain Ltd
C/O Fulcrum
105 Piccadilly
London, W1J 7NJ
United Kingdom

Prepared by:

AECOM Infrastructure & Environment UK Limited
1 Tanfield
Edinburgh EH3 5DA
United Kingdom

T: +44 131 301 8600
aecom.com

Table of Contents

Figures

No table of figures entries found.

Tables

Appendix 5.A Landscape Assessment

1.1 This Appendix should be read in conjunction with Chapter 5: Landscape and Visual Amenity and Figures 5.1-5.4. All landscape and visual mitigation is embedded and descried in Chapter 02-Proposed GB Onshore Scheme. All effects identified in the tables below are therefore residual.

1.2 This appendix provides a detailed assessment of the significance of effects on landscape receptors at each of the assessment phases: Construction, Operation (year 1) and Operation (year 15). The assessment is set out in Tables 1 to 5 below.

1.3 For the purposes of this assessment construction activities associated with the DC cable route would be experienced for up to 1 year and construction of the proposed converter station and substation would extend across a three-year programme and therefore duration is considered to be short term and reversible.

1.4 At year 1 and year 15 of operation it is considered that the duration would be long term and permanent and the proposed converter station, substation and DC cable route would not be decommissioned.

Allhallows to Stoke Marshes

Table 1 Allhallows to Stoke Marshes

Sensitivity of Landscape Receptor	Magnitude of Change	Significance of Effect
Value: Medium Susceptibility: This is a low level landscape where the horizontal nature of the big skies contributes to the strong identity and is vulnerable to the introduction largescale structures not currently present within this landscape. However given the close proximity of other industrial development to the Project Area, this LCA offers some capacity to accommodate the development. Susceptibility is considered to be **Medium**. Landscape Sensitivity: Taking into account value judgements and susceptibility to change, overall sensitivity of the landscape character is considered to be **Medium**.	Construction: Construction activity related to the proposed converter station and substation would be located within this LCA at the eastern edge resulting in effects on both the landscape fabric and character. Construction activities would be concentrated at the eastern edge, adjacent to the National Grid LNG terminal complex where extensive earthworks to create the platform, storage of materials, lay down areas, movement of plant and operation of cranes would be more apparent. However the area of land occupied by construction activities is somewhat physically detached from the majority of this LCA due to pockets of boundary vegetation, land use and most notably higher topography with very limited access. Therefore construction activities would be confined to a small portion of this LCA and concentrated away from the core area of the marshland where there would be no change to the most distinctive elements of the landscape fabric. The presence and scale of activity would have a noticeable bearing on the setting and perceptual quality of this LCA. In particular the scale and intensity of activity would reduce the existing level of tranquillity experienced and is more prevalent in eastern areas. Construction activities related to the DC cable route corridor would result in temporary physical changes to the fabric of the landscape and character within a very small footprint to the north-east of this LCA. Construction of the intertidal section of the subsea cable route would extend across the distinctive mudflats which are a characteristic feature of the North Kent Marshes SLA. Construction activities would extend from the intertidal mudflats leading to the landfall site and within the corridor for the proposed DC cable route leading to the proposed converter station and would further increase the scale and extent of activity within the landscape and North Kent Marshes SLA. Activities associated with the onshore length of the DC cable route would include the movement of plant and earthworks required for open cut trenches within a 30m wide corridor, between the proposed converter station and the landfall at the eastern extent of this LCA. Overall construction activities would affect some of the key characteristics and special qualities across a small but noticeable portion of the landscape. However there would be no physical change to the distinctive core landscape elements. On balance the magnitude of change is considered to be **Medium**.	**Moderate Adverse (Significant)**

Sensitivity of Landscape Receptor	Magnitude of Change	Significance of Effect
	The magnitude of change, assessed alongside the sensitivity would result in a **Moderate Adverse** effect, which is considered **significan**t.	
	<u>Operation (Year 1):</u> The completed proposed converter station and substation would occupy an area within this LCA but outside of the North Kent Marshes SLA and therefore would result in physical changes to the landscape fabric. Changes to the special qualities of the SLA would however be limited to the setting and perceptual aspects. The proposed converter station and substation would occupy a small area of agricultural farmland and vacant land at the eastern edge of this LCA and adjacent to the industrial complexes including the LNG terminal on land that does not exhibit the core characteristics and higher value landscape elements of the marshland landscape. The scale and mass of the proposed converter station and substation would be smaller than the adjacent LNG storage tanks and would be contained within the area of land between the OHL to the north and the industrial complexes to the south which together would limit the impression of change within this LCA. The DC cable route corridor would be fully reinstated and no permanent structures would remain in the landscape. Therefore the completed cable route would have no bearing on this LCA. Although the proposed converter station and substation would increase the influence of industrial development on the setting and backcloth of this LCA, the strong sense of place, open and panoramic views of the coastline and distinctive landscape elements would all remain intact. Overall the proposed converter station and substation would affect very few of the key characteristics across a small portion of this LCA. Taking all of this into account the magnitude of change is considered to be **Low**. The magnitude of change, assessed alongside the sensitivity would result in a **Minor Adverse** effect, which is not considered significant.	**Minor Adverse**
	<u>Operation (Year 15):</u> Physical changes to the landscape fabric of this LCA due to the introduction of the proposed converter station and substation would be the same at year 1 of operation. However the establishment of vegetation would help to reduce the scale and mass of proposed buildings and subsequently reduce the influence of the proposed converter station and substation would have on this LCA. The boundary vegetation would provide a transitional interface between the marshland landscape and the proposed converter station and substation. The resulting impression would be that the proposed converter station and substation would no longer be associated within the character and impression of this LCA. In the long term the proposed converter station and substation would be more characteristic and associated with the adjacent Industrial/ Urban Area. The establishment of native scrub and wetland vegetation would improve the strength of	**Minor Adverse**

Sensitivity of Landscape Receptor	Magnitude of Change	Significance of Effect
	the boundary vegetation and biodiversity at the interface between the proposed converter station and substation site and the core of the marshland landscape. Overall although the proposed converter station and substation would have a small but noticeable bearing on the eastern setting of this LCA, the most integral key characteristics of the landscape and the special qualities of the SLA would remain intact. Taking all of this into account the magnitude of change is considered to be **Low**. The magnitude of change, assessed alongside the sensitivity would result in a **Minor Adverse** effect, which is not considered significant.	

Hoo Peninsula Farmland

Table 2 Hoo Peninsula Farmland

Sensitivity of Landscape Receptor	Magnitude of Change	Significance of Effect
Value: Low Susceptibility: The intervening landscape and existing influence of the large scale industrial complexes on Grain, in particular the LNG terminal, and the Project Area result in a landscape tolerant of the change proposed. Susceptibility is considered to be **Low**. Landscape Sensitivity: Taking into account value judgements and susceptibility to change, overall sensitivity of the landscape character is considered to be **Low**.	Construction: Construction activities associated with the proposed converter station and substation would be located outside of this LCA at the eastern extents of the Allhallows to Stoke Marshes LCA. Activities including the movement of plant, earthworks and the operations of tower cranes would have some bearing on the eastern setting but limited to a relatively small area of farmland to the east of the neighbouring Allhallows and Lower Stoke LCA. The incremental movement of plant associated with the cable route corridor and open trench construction technique in the neighbouring LCA would have a barely perceptible bearing on the setting of this LCA. Overall all of the majority of the key characteristics would remain unchanged and changes to the setting would be minor and limited in extent. Therefore the magnitude of change is considered to be **Low**. The magnitude of change, assessed alongside the sensitivity would result in a **Minor Adverse** effect, which is not considered significant.	**Minor Adverse**
	Operation (Year 1): At year 1 of operation the proposed converter station and substation would be located within the adjacent Allhallows to Stoke Marshes LCA and alongside the existing LNG terminal. The proposed converter station and substation would add to the existing context of industrial development in the landscapes to the east of this LCA. However, given this existing context there would be very little perceptible change to the character and perceptual qualities of this LCA. The DC cable route would be reinstated and would have no bearing on this LCA. The magnitude of change is considered to be **Very Low**. The magnitude of change, assessed alongside the sensitivity would result in a **Negligible** effect, which is not considered significant.	**Negligible**
	Operation (Year 15) The establishment of vegetation would further assimilate the proposed converter station and substation into the landscape further reduce their influence on the setting of the Hoo Peninsula Farmland. Overall there would be very little perceptible change to this LCA and the magnitude of change would remain **Very Low**. The magnitude of change, assessed alongside the sensitivity would result in a **Negligible** effect, which is not considered significant.	**Negligible**

Lower Stoke Farmland

Table 3 Lower Stoke Farmland

Sensitivity of Landscape Receptor	Magnitude of Change	Significance of Effect
Value: Low Susceptibility: The existing influence of the large scale industrial complexes on Grain in particular the LNG terminal and the Application Site result in a landscape tolerant of the change proposed. Susceptibility is considered to be **Low**. Landscape Sensitivity: Taking into account value judgements and susceptibility to change, overall sensitivity of the landscape character is considered to be **Low**.	Construction: Construction activities would be located to the east in the neighbouring Allhallows to Stoke Marshes LCA and as such potential effects would be limited to the setting of this LCA. Operations at the proposed converter station and substation site including the movement of plant, earthworks and the operations of tower cranes would slightly increase the scale of movement and industry across the backcloth of this LCA. The incremental movement of plant associated with the cable route corridor and open trench construction techniques would result in limited bearing on the setting of the most easterly part of this LCA. Overall the magnitude of change is considered to be **Low**. The magnitude of change, assessed alongside the sensitivity would result in a **Minor Adverse** effect, which is not considered significant.	**Minor Adverse**
	Operation (Year 1): The completed and operational proposed converter station would be situated alongside the existing LNG terminal. Given the existing presence of industrial development and its influence on the setting of this LCA, the introduction of the convertor station and substation would result in very little perceptible change to the character and perceptual qualities of this LCA. The DC cable route would be reinstated and would have no bearing on this LCA. Therefore the magnitude of change is considered to be **Very Low**. The magnitude of change, assessed alongside the sensitivity would result in a **Negligible** effect, which is not considered significant.	**Negligible**
	Operation (Year 15): The establishment of vegetation would further assimilate the proposed converter station and substation into the landscape further reducing the influence on the setting of the Lower Stoke Farmland. There would be very little perceptible change and the magnitude of change would remain **Very Low**. The magnitude of change, assessed alongside the sensitivity would result in a **Negligible** effect, which is not considered significant.	**Negligible**

Industrial / Urban Area

Table 4 Industrial / Urban Area

Sensitivity of Landscape Receptor	Magnitude of Change	Significance of Effect
Value: Low Susceptibility: This LCA is dominated by the physical presence of industrial complexes and tolerant of the change therefore susceptibility is **Low**. Landscape Sensitivity: Taking into account value judgements and susceptibility to change, overall sensitivity of the landscape character is considered to be **Low**.	Construction: Construction activities would be located at the north-west boundary of this character area in the neighbouring Allhallows to Stoke Marshes LCA. The transportation of plant, HGVs and other vehicles to the Project Area would be via Grain Road (B2001), the primary road network within this character area. However, the regular movement of HGVs and vehicles is common place in this landscape and despite the temporary increase in the frequency of movement along the B2001 there would be little perceptible change to the overall impression of the industrial character. Construction activities along the DC cable route corridor would also temporarily increase vehicle movements through this LCA but there would be little perceptible change to the overall character. Therefore, the magnitude of change is considered to be **Very Low**. The magnitude of change, assessed alongside the sensitivity would result in a **Negligible** effect, which is not considered significant.	**Negligible**
	Operation (Year 1): Although the converter and substation is located immediately adjacent in the neighbouring character area it would effectively read as an extension to the Industrial / Urban character area. The industrial nature and scale of buildings within the proposed converter station and substation would be in keeping with the existing industrial complexes within this character area and as such there would be no perceptible change to the key characteristics. The DC cable route would be reinstated and would have no bearing on this LCA. Overall the proposed converter station and substation would read as a very small extension to this LCA and reinforce the existing industrial character. Therefore, the magnitude of change is considered to be **Low**. The magnitude of change, assessed alongside the sensitivity would result in a **Negligible** effect, which is not considered significant.	**Negligible**
	Operation (Year 15) As is the case at year 1 of operation, the proposed converter station and substation would read as an extension to this character area and would be in keeping with the industrial character. Therefore, at year 15 of operation the magnitude of change would remain **Low**. The magnitude of change, assessed alongside the sensitivity would result in a **Negligible** effect, which is not considered significant.	**Negligible**

Chetney and Greenborough Marshes

Table 5 Chetney and Greenborough Marshes

Sensitivity of Landscape Receptor	Magnitude of Change	Significance of Effect
Value: Medium Susceptibility: This LCA is located to the south of the Project Area and is physically separated by the Medway Estuary and as such is more tolerant of a large degree of change. Therefore, susceptibility is **Low**. Landscape Sensitivity: Taking into account value judgements and susceptibility to change, overall sensitivity of the landscape character is considered to be **Medium**.	Construction: The scale of intervening development to the north of the Medway Estuary at London Thamesport, Grain Power Station and the LNG terminal would substantially limit intervisibility between construction activities within the Project Area and this LCA. Tall cranes associated with the construction of buildings may be perceptible on the skyline setting to the north but would result in little discernible change to the existing industrial backdrop of this landscape. Construction activities along the DC cable route corridor would have no bearing on this LCA. Overall the magnitude of change is considered to be **Very Low**. The magnitude of change, assessed alongside the sensitivity would result in a **Negligible** effect, which is not considered significant.	**Negligible**
	Operation (Year 1): The completed and operational proposed converter station and substation would add to the existing industrial backdrop to the north of the Medway Estuary and setting of this LCA. Given the distance and limited intervisibility as a result of the scale of intervening industrial complexes London Thamesport, Grain Power Station and the LNG terminal, the introduction of the proposed converter station and substation would result no discernible change to the key characteristics of this LCA. The DC cable route would be reinstated and would have no bearing on this LCA. Therefore the magnitude of change is considered to be **Very Low**. The magnitude of change, assessed alongside the sensitivity would result in a **Negligible** effect, which is not considered significant.	**Negligible**
	Operation (Year 15) There would be no change from the assessment of effects at year 1 of operation. Therefore the magnitude of change would remain **Very Low**. The magnitude of change, assessed alongside the sensitivity would result in a **Negligible** effect, which is not considered significant.	**Negligible**

Appendix 5.B – Visual Assessment

NeuConnect: Great Britain to Germany Interconnector

GB Onshore Scheme

Appendix 05.B: Visual Assessment

NeuConnect Britain Ltd

September 2019

Prepared for:

NeuConnect Britain Ltd
C/O Fulcrum
105 Piccadilly
London, W1J 7NJ
United Kingdom

Prepared by:

AECOM Infrastructure & Environment UK Limited
1 Tanfield
Edinburgh EH3 5DA
United Kingdom

T: +44 131 301 8600
aecom.com

Table of Contents

Figures

No table of figures entries found.

Tables

Appendix 5.B Visual Assessment

1.1 This appendix should be read in conjunction with **Chapter 5: Landscape and Visual Amenity** and **Figures 5.5** and **5.6**.

1.2 The visual assessment is also supported by a package of visualisations from each of the 9 viewpoints at Operation (year 1) and Operation (year 15) which are presented on **Figures 5.8** to **5.16**.

1.3 All landscape and visual mitigation is embedded and descried in **Chapter 02- Proposed GB Onshore Scheme**. All effects identified in the tables below are therefore residual.

1.4 The following tables present the detailed assessment of visual effects at construction, operation (year 1) and operation (year 15). The baseline description and value judgment of each viewpoint is considered in Chapter 5: Landscape and Visual Amenity.

1.5 The assessment is set out in Tables 1 to 9.

1.6 For the purposes of this assessment construction activities associated with the DC cable route would be experienced for up to 1 year and construction of the proposed converter station and substation would extend across a three year programme and therefore duration is considered to be short term and reversible.

1.7 At year 1 and year 15 of operation it is considered that the duration would be long term and permanent and the proposed converter station, substation and Direct Current (DC) cable route would not be decommissioned.

Viewpoint 1

Table 1: Viewpoint 1 – Grain Coastal Park

Sensitivity of Receptor	Magnitude of Effect	Significance of Effect
Receptor Group: Recreational Distance to the Project Area: 663m Value: Medium Susceptibility: This viewpoint is representative of people walking along this coastal section of Grain Coastal Park, whose attention is in part focussed on the coastline and towards the mouth of the Thames Estuary and Southend-on-Sea. The wide angel aspect of views somewhat reduce the capacity to absorb change. Therefore susceptibility is considered to be **Medium**. Visual Sensitivity: Taking into account the value judgements and the susceptibility to change, overall visual sensitivity is considered to be **Medium**	Construction: Intervening coastal landform and woodland vegetation to the north-west would limit views of construction activities to those related to the offshore subsea cable construction leading towards the landfall site. The landfall, proposed converter station, substation and onshore DC cable route would be screened by intervening vegetation and landform. Visible construction activity would therefore be limited to the presence of plant mounted on boats associated with horizontal directional drilling techniques required for the installation of the subsea cable from the sea and across the mudflats. Construction activity would occupy a small part of this wide angle view as sections of mounted plant and vessels would move incrementally along the cable route corridor closer towards the shore. The addition of working vessels in this part of the view is not entirely uncommon amongst the frequent movement of cargo ships and is therefore unlikely to distract from the wider focus of views along the coastline. Tidal influence, in particular low tide would reveal a slightly greater extent of construction activity on the mudflats closer to the shoreline. Taking all of this into account, the magnitude of change is considered to be **Low**. The magnitude of change assessed alongside the sensitivity would result in a **Minor Adverse** effect, which is not considered significant.	**Minor Adverse**
	Operation (Year 1): Intervening woodland vegetation would entirely screen views of the proposed converter station and substation. At operation, the offshore cable route would be buried and together the GB Onshore Scheme would result in no perceptible change in views from Grain Coastal Park. Therefore, the magnitude of change would be **Very Low**. The magnitude of change, assessed alongside the sensitivity would result in a **Negligible** effect, which is not considered significant.	**Negligible**
	Operation (Year 15): Impacts at year 15 would be the same as those experienced at year 1 of operation and the proposed converter station and substation would be barely discernible. Therefore, the magnitude of change would remain **Very Low**. The magnitude of change, assessed alongside the sensitivity would result in a **Negligible** effect, which is not considered significant.	**Negligible**

Viewpoint 2

Table 2: Viewpoint 2 – West Lane

Sensitivity of Receptor	Magnitude of Effect	Significance of Effect
Receptor Group: Residential Distance to the Project Area: 0m (adjacent to Project Area) Value: Low Susceptibility: This viewpoint is representative of views from a residential property where the views will be experienced daily and are an important part of the experience. Susceptibility is **High**. Visual Sensitivity: Taking into account the value judgements and the susceptibility to change, overall visual sensitivity is considered to be **Medium**	Construction: Construction activity at the proposed converter station and substation site would be prominent in mid-range views. The introduction of plant, largescale earthworks, storage of materials, building works and laydown areas would be partially screened at ground level by intervening vegetation at Perry's Farm. The overall scale and extent of construction activities would be highly noticeable across half of the horizontal extent of views. The majority of the tallest building works associated with the proposed converter station and substation would be contained between the Liquified Natural Gas (LNG) terminal and the overhead line (OHL) however lay down areas and civil engineering works associated with the proposed National Grid Electricity Transmission (NGET) sealing end compound would extend north of the OHL. Construction activity associated with the DC cable route corridor would be visible in incremental lengths along the construction corridor in close proximity to the residential properties on West Lane and a number of properties along the B2001. The movement of plant, earthworks and temporary storage of material associated with open cut trenches and other techniques would temporarily dominate the focus of close range views experienced by residents. Overall construction activities would result in substantial disruption to visual amenity therefore the magnitude of change is considered to be **Medium**. The magnitude of change assessed alongside the sensitivity would result in a **Moderate Adverse** effect, which is considered **significant**.	**Moderate Adverse (Significant)**
	Operation (Year 1): At year 1 of operation the proposed converter station and substation would occupy a noticeable proportion of mid-range views but contained between the LNG terminal and the OHL. The height of the proposed converter station would appear less than the pylon tower and LNG storage tanks. The substation would appear against the façade of the proposed converter station alongside the outdoor electrical equipment. The proposed landscape and SUDS reinstatement features would appear to the north of the permanent buildings and infrastructure. The DC cable route corridor would be reinstated and would have no bearing on views and open distance vistas towards Allhallows would remain clearly distinguishable. The proposed converter station and substation would be immediately visible in mid-range views strongly associated with the existing industrial facilities but would be prominent albeit oblique to the main focus. Taking all of this into account, the magnitude of change is considered to be **Medium**. The magnitude of change assessed alongside the sensitivity would result in a **Moderate Adverse** effect, which is considered **significant**.	**Moderate Adverse (Significant)**

Sensitivity of Receptor	Magnitude of Effect	Significance of Effect
	Operation (Year 15): At year 15 once vegetation has established, there would be a linear belt of low level scrub and woodland edge would extend across part of the horizontal extent of the view to the north-west the proposed converter station and substation. However, the overall scale and extent of change would remain the same as at year 1 and therefore the magnitude of change would be **Medium**. The magnitude of change assessed alongside the sensitivity would result in a **Moderate Adverse** effect, which is considered **significant**.	**Moderate Adverse (Significant)**

Viewpoint 3

Table 3: Viewpoint 3 - Circular Walk 3 - Allhallows Marshes

Sensitivity of Receptor	Magnitude of Effect	Significance of Effect
Receptor Group: Recreational Distance to the Project Area: 1.8km Value: Medium Susceptibility: This viewpoint is representative of recreational walkers along this part of the circular walk, whose attention will be in part focussed on the landscape particularly views across the marshland and coastline. Views towards the Project Area are unlikely to be the primary focus of the view. Therefore susceptibility is considered to be **Medium**.	Construction: Construction activity at the proposed converter station and substation would appear in mid-range views between the OHL and the LNG Terminal against the backdrop of more distant industrial complexes. Construction activities would also appear to the north of the OHL at the proposed NGET sealing end compound. The extent of construction activities visible would be more prominent in closer proximity sections of this walk. The movement of plant, earthworks, vegetation clearance, storage of materials, temporary facilities, operation of cranes and temporary laydown areas would be highly noticeable and would distract from the visual amenity across a noticeable horizontal extent of the view. Taller plant and activities related to the building works would all appear to the south of the OHL and pylon towers. Construction activities related to the DC cable route including movement of plant along incremental lengths of 800m across a 30m wide corridor would be perceptible in the background extending from the coast to the substation. However these activities would be temporary in nature. Temporary construction activities at the DC cable route would appear against the backdrop of the distinctive marshland whilst activities at the proposed converter station and substation would be oblique to the main focus. Overall the magnitude of change is considered to be **Medium**. The magnitude of change assessed alongside the sensitivity would result in a **Moderate Adverse** effect, which is considered **significant**.	**Moderate Adverse (Significant)**
	Operation (Year 1): At operation the scale and mass of the proposed converter station and substation would be noticeable across a noticeable horizontal extent contained between the OHL and LNG Terminal which is associated with a lower quality part of the view. The extent of the view occupied by proposed converter station and substation would be greater in closer proximity sections of this walk. The height of the proposed converter station and substation would appear lower than the adjacent LNG terminal and the more distant stacks and turbines associated with other industrial complexes. The proposed NGET sealing end compound would occupy a small area within the field to the north of the existing OHL. The DC cable route would be reinstated and would have no bearing on the view. The proposed converter station substation would appear within the context of the LNG terminal and would increase the swathe of industrial buildings across the background. However, the proposed converter station would not compromise	**Moderate Adverse (Significant)**

Sensitivity of Receptor	Magnitude of Effect	Significance of Effect
Visual Sensitivity: Taking into account the value judgements and the susceptibility to change, overall visual sensitivity is considered to be **Medium.**	the more scenic and attractive quality of marshland and seaward views. Overall the magnitude of change is considered to be **Medium**. The magnitude of change assessed alongside the sensitivity would result in a **Moderate Adverse** effect, which is considered **significant**.	
	Operation (Year 15): At year 15 of operation established scrub and woodland edge vegetation would soften the interface of the built edge of the proposed converter station and substation and would help create a sense of separation between the marshland and the building facades. The established vegetation would also reduce the apparent scale and mass of the proposed converter station and substation, whilst the NGET compound would be screened. The most scenic elements of the view, in particular the marshland landscape and seaward views would not be affected. Taking all of this into account, the magnitude of change is considered to be **Low**. The magnitude of change, assessed alongside the sensitivity would result in a **Minor Adverse** effect, which is not considered significant.	**Minor Adverse**

Viewpoint 4

Table 4: Viewpoint 4 - Stoke Road

Sensitivity of Receptor	Magnitude of Effect	Significance of Effect
Receptor Group: Residential Distance to the Project Area: 3.9km Value: Low Susceptibility: This viewpoint is representative of views from a residential property where the views will be experienced daily and are an important part of the experience. Susceptibility is **High**. Visual Sensitivity: Taking into account the value judgements and the susceptibility to change, overall visual sensitivity is considered to be **Medium**	Construction: Construction activities at the proposed converter station and substation would be noticeable in distant views across a small section of the background mostly between the OHL and the LNG Terminal. The movement of plant, earthworks, vegetation clearance, storage of materials, temporary facilities, operation of cranes and temporary laydown areas would distract from the main focus of views form residential properties during the 3 year construction period. Construction activities related to the DC cable route would be barely perceptible across the distant background. Overall, the open expansive nature of the marshland landscape and the seaward views would remain undisturbed key features. Overall the magnitude of change is considered to be **Medium**. The magnitude of change, assessed alongside the sensitivity would result in a **Moderate Adverse** effect, which is considered **significant**.	**Moderate Adverse (Significant)**
	Operation (Year 1): At operation the proposed converter station and substation would occupy a small but noticeable portion of the background view between the OHL and LNG Terminal however the height and mass would appear smaller than the adjacent LNG storage containers. The proposed NGET sealing end compound would appear north of the OHL. The proposed converter station would distract from the main focus of the view and within the context of and contained by the LNG terminal and other industrial complexes to the south of the OHL, whilst the open marshland landscape that fills the majority of the background view north would remain unaffected. The DC cable route would be reinstated and would have no bearing on the view. Taking all of this into account, the magnitude of change is considered to be **Medium**. The magnitude of change, assessed alongside the sensitivity would result in a **Moderate Adverse** effect, which is considered **significant**.	**Moderate Adverse (Significant)**
	Operation (Year 15): Once established, vegetation would partially screen lower level buildings and compounds which would help to assimilate the proposed converter station and substation into the landscape and subsequently the view. Established vegetation would break up the built facade and therefore reduce the sense of scale and mass of the taller buildings within the proposed converter station platform. Established boundary vegetation would also reinforce the delineation between the open marshland landscape and the industrial complexes. The overall magnitude of change would reduce to **Low**. The magnitude of change, assessed alongside the sensitivity would result in a **Minor Adverse** effect, which is not considered significant.	**Minor Adverse**

Viewpoint 5

Table 5: Viewpoint 5 - Ratcliffe Highway

Sensitivity of Receptor	Magnitude of Effect	Significance of Effect
Receptor Group: Residential Distance to the Project Area: 4.6km Value: Medium	Construction: Construction activity at the proposed converter station and substation would be limited to a small proportion of the distant background view. The movement of plant, earthworks, vegetation clearance, storage of materials, temporary facilities, operation of cranes and temporary laydown areas would appear in a small portion of this expansive view to the north of the LNG storage containers. The most scenic qualities of the view including the marshland landscape and context of the Thames Estuary remain key features. Construction activities related to the DC cable route would be barely perceptible across the distant background. Taking all of this into account, the magnitude of change is considered to be **Low**. The magnitude of change, assessed alongside the sensitivity would result in a **Minor Adverse** effect, which is not considered significant.	**Minor Adverse**
Susceptibility: This viewpoint is representative of views from a residential property where the views will be experienced daily and are an important part of the experience. Susceptibility is **High**. Visual Sensitivity: Taking into account the value judgements and the susceptibility to change, overall visual sensitivity is considered to be **Medium**.	Operation (Year 1): The completed and operational proposed converter station and substation would be notable elements in the view and appear across a small horizontal extent of the overall view adjacent to the LNG storage containers. The scale and mass of the proposed converter station and substation would slightly extend the swathe of industrial complexes in the view but would appear smaller than the LNG storage containers in view. The DC cable route would be reinstated and would have no bearing on the view. The most scenic qualities including the marshland landscape and context of the Thames Estuary remain unchanged. Overall the proposed converter station and substation would result in a slight change to the composition and balance of features within the view. Taking all of this into account, the magnitude of change is considered to be **Low**. The magnitude of change, assessed alongside the sensitivity would result in a **Minor Adverse** effect, which is not considered significant.	**Minor Adverse**
	Operation (Year 15): Once established, vegetation would partially screen lower level compounds and help to assimilate the proposed converter station and substation into the landscape and view and partially reduce the sense of scale and mass. However, the overall magnitude of change would remain **Low**. The magnitude of change, assessed alongside the sensitivity would result in a **Minor Adverse** effect, which is not considered significant.	**Minor Adverse**

Viewpoint 6

Table 6: Viewpoint 6 - Saxon Shore Way

Sensitivity of Receptor	Magnitude of Effect	Significance of Effect
Receptor Group: Recreational Distance to the Project Area: 7.5km Value: Medium Susceptibility: This viewpoint is representative of views from recreational users walking along this national long distance trail where long views across the vast landscape are an important part of the experience but views towards the Project Area are not the primary focus of views. Susceptibility is **Medium**. Visual Sensitivity: Taking into account the value judgements and the susceptibility to change, overall visual sensitivity is considered to be **Medium.**	Construction: Intervening industrial complexes including the large gantry cranes at London Thamesport would largely screen the majority of construction activity. Tall plant such as cranes required to erect buildings within the proposed converter station would be perceptible in the distant background across a very limited extent of the view. Construction activities related to the DC cable route would be entirely screened. Overall construction activity would be barely perceptible and the magnitude of change is considered to be **Very Low**. The magnitude of change, assessed alongside the sensitivity would result in a **Negligible** effect, which is not considered significant	**Negligible**
	Operation (Year 1): At operation the completed proposed converter station and substation would appear as part of the existing backcloth of industrial complexes. The scale and mass of the proposed converter station and substation would be barely discernible beyond the existing industrial developments across a very limited extent of the background. The DC cable route would have no bearing on the view. Overall the proposed converter station and substation would have little bearing on the balance and composition of the view therefore the magnitude of change is considered to be **Very Low**. The magnitude of change, assessed alongside the sensitivity would result in a **Negligible** effect, which is not considered significant.	**Negligible**
	Operation (Year 15): Impacts at year 15 would be the same as those experienced at year 1 of operation and the proposed converter station and substation would be barely discernible. Therefore, the magnitude of change would remain **Very Low**. The magnitude of change, assessed alongside the sensitivity would result in a **Negligible** effect, which is not considered significant.	**Negligible**

Viewpoint 7

Table 7: Viewpoint 7 - Queensborough Coastal Path

Sensitivity of Receptor	Magnitude of Effect	Significance of Effect
Receptor Group: Recreational Distance to the Project Area: 4.2km Value: Low Susceptibility: This viewpoint is representative of views from recreational users walking along this this coastal path where views across the marshland landscape an important part of the experience but views towards the Project Area are not the primary focus of views. Susceptibility is **Medium**. Visual Sensitivity: Taking into account the value judgements and the susceptibility to change, overall visual	Construction: Construction activities at the proposed converter station and substation would be largely screened by Grain Power Station. Taller plant, including cranes required to construct buildings would be seen in the context of the existing stacks and pylon towers. Construction activities related to the DC cable route would be barely perceptible. Overall, construction activities would occupy a small extent of the background. The magnitude of change is considered to be **Low**. The magnitude of change assessed alongside the sensitivity would result in a **Minor Adverse** effect, which is not considered significant.	**Minor Adverse**
	Operation (Year 1): At operation the proposed converter station and substation would be partially screened by intervening development at Grain Power Station and the LNG terminal. The tallest proposed converter station buildings would appear between the LNG storage container and the power station, but at a smaller scale and mass to the existing buildings in view. The small extent of buildings visible would further reinforce the influence of industrial complex within the view but would not increase the horizontal extent of industrial influence across the backcloth of the view. The DC cable route would have no bearing on the view. Although part of the proposed converter station would be visible the overall composition and balance of feature would remain unchanged. The magnitude of change is considered to be **Low**. The magnitude of change, assessed alongside the sensitivity would result in a **Minor Adverse** effect, which is not considered significant.	**Minor Adverse**
	Operation (Year 15): There would be no change from the assessment of effects at year 1 of operation. Therefore, the magnitude of change would remain **Low**. The magnitude of change assessed alongside the sensitivity would result in a **Minor Adverse** effect, which is not considered significant.	**Minor Adverse**

Viewpoint 8

Table 8: Viewpoint 8 - Riverside Country Park

Sensitivity of Receptor	Magnitude of Effect	Significance of Effect
Receptor Group: Recreational Distance to the Project Area 10.3km Value: Medium Susceptibility: This viewpoint is representative of views from recreational users of the Riverside Country Park and the Saxon Shore Way where views across the landscape are an important but not fundamental given the industrial composition of the background. Susceptibility is **Medium**. Visual Sensitivity: Taking into account the value judgements and the susceptibility to change, overall visual sensitivity is considered to be **Medium**.	Construction: Views of construction activity within the Project Area would appear distant and seen in the context of the industrial complexes north of the Medway Estuary. Taller plant such as cranes associated with the construction of the proposed converter station and would appear beyond the gantry cranes at London Thamesport, would occupy a very small extent of the background view and would represent a barely perceptible change to the overall view. Construction activities related to the DC cable route would be entirely screened. The magnitude of change is considered to be **Very Low**. The magnitude of change, assessed alongside the sensitivity would result in a **Negligible** effect, which is not considered significant.	**Negligible**
	Operation (Year 1): At operation the completed proposed converter station and substation would be barely discernible across a very limited extent of the background view. The proposed converter station would not be specifically distinguishable amongst the backdrop of large scale industrial complexes on the Isle of Grain and would not alter the balance composition or focus of the view. The DC cable route would be reinstated and would have no bearing on the view. Therefore, the magnitude of change is considered to be **Very Low**. The magnitude of change assessed alongside the sensitivity would result in a **Negligible** effect, which is not considered significant.	**Negligible**
	Operation (Year 15): Impacts at year 15 would be the same as those experienced at year 1 of operation and the proposed converter station and substation would be barely discernible. Therefore, the magnitude of change would remain **Very Low**. The magnitude of change assessed alongside the sensitivity would result in a **Negligible** effect, which is not considered significant.	**Negligible**

Viewpoint 9

Table 9: Viewpoint 9 - Furze Hill

Sensitivity of Receptor	Magnitude of Effect	Significance of Effect
Receptor Group: Recreational Distance to the Project Area: 6.2km Value: Low Susceptibility: This viewpoint is representative of recreational users of this PRoW where background views are largely dominated by industrial complexes and is somewhat tolerant of the change proposed. Therefore, susceptibility is **Medium**. Visual Sensitivity: Taking into account the value judgements and the susceptibility to change, overall visual sensitivity is considered to be **Low.**	Construction: Intervening buildings would largely screen relatively distant views of construction activity. Perceptible change would be limited to a very small portion of the background view and would be seen in combination with existing tall plant and structures. Construction activities related to the DC cable route would be mostly screened. Overall construction activities would result in a barely discernible change to the composition of the existing view therefore the magnitude of change is considered to be **Very Low**. The magnitude of change assessed alongside the sensitivity would result in a **Negligible** effect, which is not considered significant.	**Negligible**
	Operation (Year 1): At operation the proposed converter station and substation would be partially screened by intervening industrial scale buildings on Grain and the western edge of the Isle of Sheppey. The limited extent of proposed converter station and substation visible would be distant and barely distinguishable amongst the mass of existing industrial complexes in that part of the background view. The DC cable route would be reinstated and would have no bearing on the view. Therefore, the magnitude of change is considered to be **Very Low**. The magnitude of change, assessed alongside the sensitivity would result in a **Negligible** effect, which is not considered significant.	**Negligible**
	Operation (Year 15): Impacts at year 15 of operation would be the same as those experienced at year 1 of operation. Therefore, the magnitude of change is considered to be **Very Low**. The magnitude of change, assessed alongside the sensitivity would result in a **Negligible** effect, which is not considered significant.	**Negligible**