



AQUIND Limited

AQUIND INTERCONNECTOR

Application Cover Letter

The Planning Act 2008

The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations
2009 – Regulation 5(2)(q)

Document Ref: 1.1

PINS Ref.: EN020022

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The Planning Inspectorate
National Infrastructure Directorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Our Ref: EN020022
14 November 2019

Dear Sirs,

Planning Act 2008 (as amended) – AQUIND Interconnector

OVERVIEW

We are pleased to enclose an application by AQUIND Limited (the '**Applicant**') under the Planning Act 2008 (as amended) (the '**PA 2008**') for a Development Consent Order in respect of the Proposed Development (the '**Application**').

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

The Application seeks development consent for those elements of the Project located in the UK and the UK Marine Area (the '**Proposed Development**'). The Proposed Development includes:

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

Whilst interconnectors are not directly listed among the types of energy infrastructure that are assigned the status of Nationally Significant Infrastructure Project ('**NSIP**') under the PA 2008, on

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19 June 2018 the Applicant submitted a request to the Secretary of State ('SoS') for a direction pursuant to section 35 of the PA 2008 that the Proposed Development is to be treated as development for which development consent is required. On 30 July 2018 the SoS directed that the Proposed Development, together with any development associated with it, is to be treated as development for which development consent is required. In addition the SoS directed that the Overarching National Policy for Energy (EN-1) ('NPS EN-1') should apply to the Application as it would to a generating station of a similar capacity as the capacity of the Project.¹

Engagement has been ongoing with consultees prior to and throughout the progression of the Application. The consultation and engagement undertaken has helped shape the scope of the Environmental Impact Assessment ('EIA'), the evolution of the Proposed Development and has helped to reduce potential effects on the surrounding community and the environment.

DOCUMENTATION ENCLOSED AND APPLICATION FEE

In accordance with Advice Note Six: 'Preparation and submission of application documents' (November, 2019), we enclose three memory sticks containing electronic copies of the following Application documents:

- Category 1 documents – signed Application Form and related documents;
- Category 2 documents – Plans;
- Category 3 documents – draft Order and Explanatory Memorandum;
- Category 4 documents – Compulsory Acquisition Information;
- Category 5 documents – Reports; and
- Category 6 documents – Environmental Statement.

To assist in reviewing the adequacy of pre-application consultation, Advice Note Six requires Applicants to provide the Planning Inspectorate with a GIS shapefile of the land over which authorisation is sought within the application. The GIS shapefile was provided to the Planning Inspectorate on 14 October 2019.

A CHAPS payment in the sum of £7,106 for the application fee has been arranged and was sent to the account of the Planning Inspectorate on 22 October 2019.

APPLICATION FORMALITIES

The Application is made in the form required by section 37(3)(b) of the PA 2008. The Application documents comply with the overall requirements of section 37 and the requirements set out in:

- the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended);
- the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017; and
- published Communities and Local Guidance and the Planning Inspectorates' Advice Note Six: 'Preparation and submission of application documents' (November, 2019).

The Application seeks consent for the Authorised Development which is described in full in Schedule 1 of the draft Development Consent Order (the '**Order**') (document reference 3.1). The Order will authorise the construction, maintenance and operation of the Authorised Development. Further information regarding the purpose and effect of provisions in the draft Order is contained in

¹ Direction issued under section 35 of the Planning Act 2008 relating to AQUIND Interconnector, 30 July 2018: <https://www.gov.uk/government/publications/energy-infrastructure-development-application-aquind-interconnector-decision> and included as Appendix 5.4.3 of the Planning Statement (Document Reference 5.4)



the Explanatory Memorandum (document reference 3.2) and information regarding the Authorised Development is contained in the Environmental Statement (document references 6.1 – 6.4).

The Application Guide (document reference 1.2) details the structure of the Application and the document referencing system that has been used. A document tracker (document reference 1.3) and section 55 checklist is also provided to assist with signposting of the Application documents (document reference 1.5). The Electronic Application Index (document reference 1.6) provides a complete list of all submission documents.

CONSENT FLEXIBILITY

The Converter Station, the Telecommunications Building and the Optical Regeneration Stations are to be consented using a parameter approach, with the buildings and equipment subject to maximum dimension constraints to allow for an assessment of the worst case likely significant environmental effects within a development envelope. The final design of those buildings is to be approved following the Order being made. The final siting of the Converter Station is also to be confirmed following the Order being made, with two options for this presented within the Converter Station Area.

In addition, the HVDC cables are to be laid within the limits of deviation provided by the Onshore and Marine Cable Corridors and within the Onshore Cable Corridor options for the routing of the Onshore Cables are provided in certain locations, in light of environmental constraints. This approach is required to ensure adequate design flexibility for the chosen contractor(s) to allow them to implement the optimal solution from a technological and environmental perspective, within the fully assessed parameters.

In adopting a parameters approach, the Applicant has carefully considered the guidance within NPS EN-1 and within the Planning Inspectorate Advice Note Nine: Rochdale Envelope.

DEEMED MARINE LICENCE

Schedule 15 of the draft Order includes the marine licence which would be deemed to be granted for works comprised in the Authorised Development. The Applicant has engaged with the Marine Management Organisation and other relevant stakeholders regarding the deemed marine licence.

CONSULTATION

A Consultation Report (document reference 5.1) has been submitted as part of the Application, which explains and provides evidence of how the Applicant has complied with its duties to carry out pre-application consultation under the PA 2008. The Consultation Report includes details of the responses received in response to consultation under Sections 42, 47 and 48 of the PA 2008, how the Applicant has had regard to them and how the Proposed Development has evolved as a result.

In accordance with the Data Protection Act 1998 and the EU General Data Protection Regulation 2016/679, the Planning Inspectorate will need to have regard to whether the Consultation Report is suitable for publication upon submission.

HABITATS REGULATIONS

The Application includes a Habitats Regulations Assessment Report (document references 6.8.1 – 6.8.3), as required by Regulation 5(2)(g) of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. This Report provides sufficient information to enable the



SoS to make an appropriate assessment of the implications of the Proposed Development as required by regulation 63 of the Conservation of Habitats and Species Regulations 2017 .

COMPULSORY ACQUISITION

The draft Order contains powers to enable the acquisition of land, new rights over land and the imposition of restrictions that are necessary in connection with the construction, operation and maintenance of the Proposed Development. Such powers will be necessary to be used where the necessary land or rights over land cannot be acquired by voluntary agreement.

The land over which powers to compulsorily acquire is sought in respect of the freehold is shown on the Land Plans (document reference 2.2) and described in more detail in the Statement of Reasons (document reference 4.1) and Book of Reference (document reference 4.3). Adequacy of funding for compensation is dealt with in the Funding Statement (document reference 4.2).

Please note that the Book of Reference contains personal data and therefore consideration will need to be given as to whether it is suitable for publication under the Data Protection Act 1998 and the EU General Data Protection Regulation 2016/679.

OTHER CONSENTS

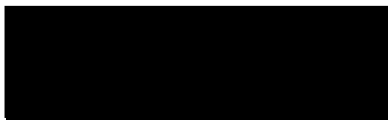
The Order will grant development consent for the construction, operation and maintenance of the Proposed Development, however there are a number of other consents and licences that will or may be required from bodies such as Natural England and the Marine Management Organisation.

Details of other the consents and licences which the Applicant or others may be seeking in relation to the construction and operation of the Proposed Development, are detailed in the Other Consents and Licences document (document reference 5.2).

We look forward to hearing from you in relation to the formal acceptance of the Application.

Should you require any further clarifications or assistance please contact +44 (0)7465330784 or email  cc Aquind-DCO@wsp.com in the first instance.

Yours faithfully



Louise Rich
Technical Director, Planning