

Regeneration Services
Floor 4
Civic Offices
Guildhall Square
Portsmouth
PO1 2NE

23 October 2020

AQUIND Interconnector

Dear Mr Samuels and Cllr Pitt,

It has come to our attention that, in a letter sent by yourselves to Milton Piece and Eastney Lake allotment holders on 16th October 2020, you raised concerns regarding the impact of the proposals for AQUIND Interconnector on Milton and Eastney Allotments. If I may, I would like to take this opportunity to respond to your letter and provide some clarity on some of the matters raised.

First, I would like to stress that no allotment plots will be “cleared” as part of the construction, operation or maintenance of AQUIND Interconnector.

The project’s cables are to be installed under the allotments and Milton Locks Nature Reserve via a process known as Horizontal Directional Drilling (HDD), which will take place between the car park located west of the Thatched House Pub and the grassed area east of Kingsley Road. This approach allows the cables to be installed deep underground with no impacts at surface level. To allow for inspections during construction and operation, AQUIND is seeking access rights on foot over some of the existing paths and internal roads of the allotments site but not over any of the allotment plots.

The cables that AQUIND will install along the onshore cable route will be laid in sections between joint bays at different locations along the route. The locations of the joint bays will be determined as part of the detailed design process and will depend on physical characteristics such as space availability, as well as minimising impacts during construction and when maintenance is required. On behalf of AQUIND, I confirm there will not be any joint bays located on the allotments and the adjacent Milton Locks Nature Reserve as, whilst the joint bays will be below ground level, they are positioned close to the drilling locations, with the cables pulled through the ducts installed via HDD between them. In addition, maintenance activities associated with HDD cable sections will take place at the joint bays. Save for any inspections on foot, there will be no maintenance activities undertaken on the allotments and the adjacent Milton Locks Nature Reserve.

This approach was communicated to stakeholders, including the Council, in advance of the submission of the Development Consent Order (DCO) application for the project and clearly provided for in the documentation submitted. Until recently, no concerns with this approach had been expressed, and at this time there have been no efforts to raise this matter with AQUIND so that they could consider how to address the concerns raised so as to ensure all parties are content with the position and how it is secured.

On our review and in advance of communicating this to the Council and before any concerns were raised in public by senior representatives of the Council, it was recognised that the plans submitted did not correctly show the area over which access is required, so we took steps to remove from the Land Plans any areas for access that covered the actual allotment plots. This clarification was communicated to the Council during a teleconference on 28th September, in advance of the submission of this information at Deadline 1 of the Examination. It was disappointing to see that following this teleconference confirming the position and corrections to be made, senior representatives of the Council raised this matter publicly in a manner which has caused considerable and unnecessary anxiety amongst the allotment holders and the community in Portsmouth more generally.

In your letter you make reference to AQUIND seeking access rights over parts of the allotments to enable maintenance of the underground cables take place. This is indeed the case; however, as set out below, the maintenance activities will not result in any impact to the allotments. The types of maintenance can be classified into two categories; scheduled maintenance and unscheduled maintenance.

Scheduled Maintenance – This would consist of walk over inspections of the cable route to ensure activities are not taking place above the cable route which could impacts its operation (e.g. deep excavation or piling). The frequency of the walk over surveys would typically be once per quarter. In the allotments, this would consist of a short walk over the existing paths to undertake a visual inspection of the areas which will sit above the cables.

Other scheduled maintenance activities in relation to the cable route include taking readings from a number of underground link boxes and above ground link pillars which will be installed adjacent to a number of the joint bays.

Unscheduled Maintenance – This would consist of repairing a cable in the extremely rare event of a cable fault and would involve removing the section of cable in which the fault was present and replacing it with a new section of cable. In areas where HDD is used to install cables, the replacement would take place by removing the section of cable between the two joint bays either side of the section of cable in question. Then a new section of cable would be pulled through the underground duct already installed and the new section of cable would be jointed to the existing cables at the two joint bays in question. This means that, in the very unlikely event there was a cable fault along the section of cables to be installed under the allotments, the repair of that section would be undertaken from joint bays located off the allotments and no unscheduled maintenance activities would take place on the allotments.

We have recently been in touch with the Eastney and Milton Allotment Holders Association to clarify the above points and are committed to engaging with representatives of the Allotment Holders Association, and other stakeholders, throughout the Examination process. A copy of the correspondence recently issued to the Chairman of the Allotment Holders Association is enclosed for your information and also available on the Planning Inspectorate's [website](#).

We have also enclosed a copy of the presentation used at a meeting with a number of allotment holders, members of the Allotment Holders Association Committee and Council staff at the allotments on 22nd November 2019. At that presentation it was clearly stated that the Onshore Cable Route would be installed under the Milton and Eastney Allotments using horizontal directional drilling (HDD) and not by open trenching. The presentation also provided details about the DCO Process including the period

within which parties could register as Interested Parties. Copies of a Briefing Note in relation to the DCO Process were also distributed to attendees. The presentation and Briefing Note were sent to the secretary of the Allotment Association Committee on 25 November 2019 along with contact details in case of further queries and an offer to hold a follow up meeting at a later stage should it be of benefit. A copy of the Briefing Note is also enclosed with this letter.

In your letter, you also note a concern that “Affected Persons”, with an interest in land potentially affected by the project have not been notified by AQUIND as part of the planning process. We confirm on behalf of AQUIND that as no access will be taken over the individual allotment plots, and because the allotment plot holders do not have tenancies over the access road and paths but the individual allotments plots only, the interests in land which those persons hold will not be affected. In addition, because the cables in this location are to be installed by HDD, and because it is understood the Council are the owner of the subsoil of the land at the depth of installation, again the interest held by the allotment plot holders will not be affected. Should the Council consider otherwise we should be grateful to discuss this further.

We note that a Land Interest Questionnaire was sent to the Council on 10th December 2018 as part of AQUIND’s diligent enquiry to identify persons with an interest in the land to be affected, requesting information in relation to the Council’s land interests but that no response was received from the Council. Similarly, a Confirmation Schedule, the purpose of which was to seek the Council’s confirmation of the information that AQUIND held in relation to land ownership and interests was correct and to identify any other persons who may have interests in the land to be affected so that AQUIND may contact them regarding the proposals, was sent to the Council on 2nd October 2019. Again, no response was received from the Council.

It is also noted that in your letter you suggest that the decision to direct the AQUIND Interconnector project to be development for which development consent is required and for which a decision is to be taken by the Secretary of State was a matter that was agreed between central government and AQUIND. We confirm that this suggestion is incorrect. The process followed was that provided for by section 35 of the Planning Act 2008, whereby an application is made for a direction and is independently considered by the relevant government department as necessary. The documents issued to apply for this direction are available on the Planning Inspectorate’s webpage for the application, should you wish to view to them to further understand the process undertaken.

Finally, we would like to take this opportunity to request that the Council do seek to engage with AQUIND about matters such as those discussed above. Whilst it is noted that the Council have an in-principle objection to the proposals for AQUIND Interconnector, it is expected that an applicant and a host local planning authority will work with one another in a constructive manner to address issues which can be addressed between them.

With that in mind, I would also like to take this opportunity to ask if the Council would be interested in working alongside AQUIND to develop a communication strategy for the project so that we may, collectively, ensure the local community and other key stakeholders are in receipt of accurate information regarding the proposals moving forward, and that any inaccurate information about the project which has the potential to lead to unnecessary anxiety amongst the local community is corrected at the earliest opportunity. This approach, where representatives of AQUIND and the Council worked together to ensure a consistent message was provided for the benefit of the local community, was taken

in relation to the programme of ground investigations which took place in Portsmouth, including the allotments, in mid to late 2018.

In this spirit, AQUIND would also like to extend an invitation to Cllr Pitt and Cllr Vernon-Jackson to attend teleconference meetings between the AQUIND team and Council officers regarding the project, to avoid potential misunderstandings in the future.

In the meantime, if you would like to get in touch with the project team, please contact us via our freephone information line on 01962 893869, or via email at aquindconsultation@becg.com and we will be happy to discuss further.

For the purposes of transparency, I should also note that a copy of this letter has been provided to the Planning Inspectorate as part of the Examination Process.

Yours sincerely,

James Wood – AQUIND Community Engagement Team

By copy to:

- Mr David Williams, Chief Executive of Portsmouth City Council (David.Williams@portsmouthcc.gov.uk)
- Councillor Gerald Vernon-Jackson CBE, Leader of Portsmouth City Council (cllr.gerald.vernon-jackson@portsmouthcc.gov.uk)
- Councillor Ben Dowling, Ward Member for Milton Ward (cllr.ben.dowling@portsmouthcc.gov.uk)
- Councillor Will Purvis, Ward Member for Milton Ward (Cllr.Will.Purvis@portsmouthcc.gov.uk)

Enc.

- Copy of the letter issued to the Chairman of the Allotment Holders Association on 20th October 2020
- Copy of the presentation provided to a number of allotment holders, members of the Allotment Holders Association Committee and Council staff at the allotments on 22nd November 2019
- Copy of a Briefing Note in relation to the DCO Process provided at the allotments on 22nd November 2019

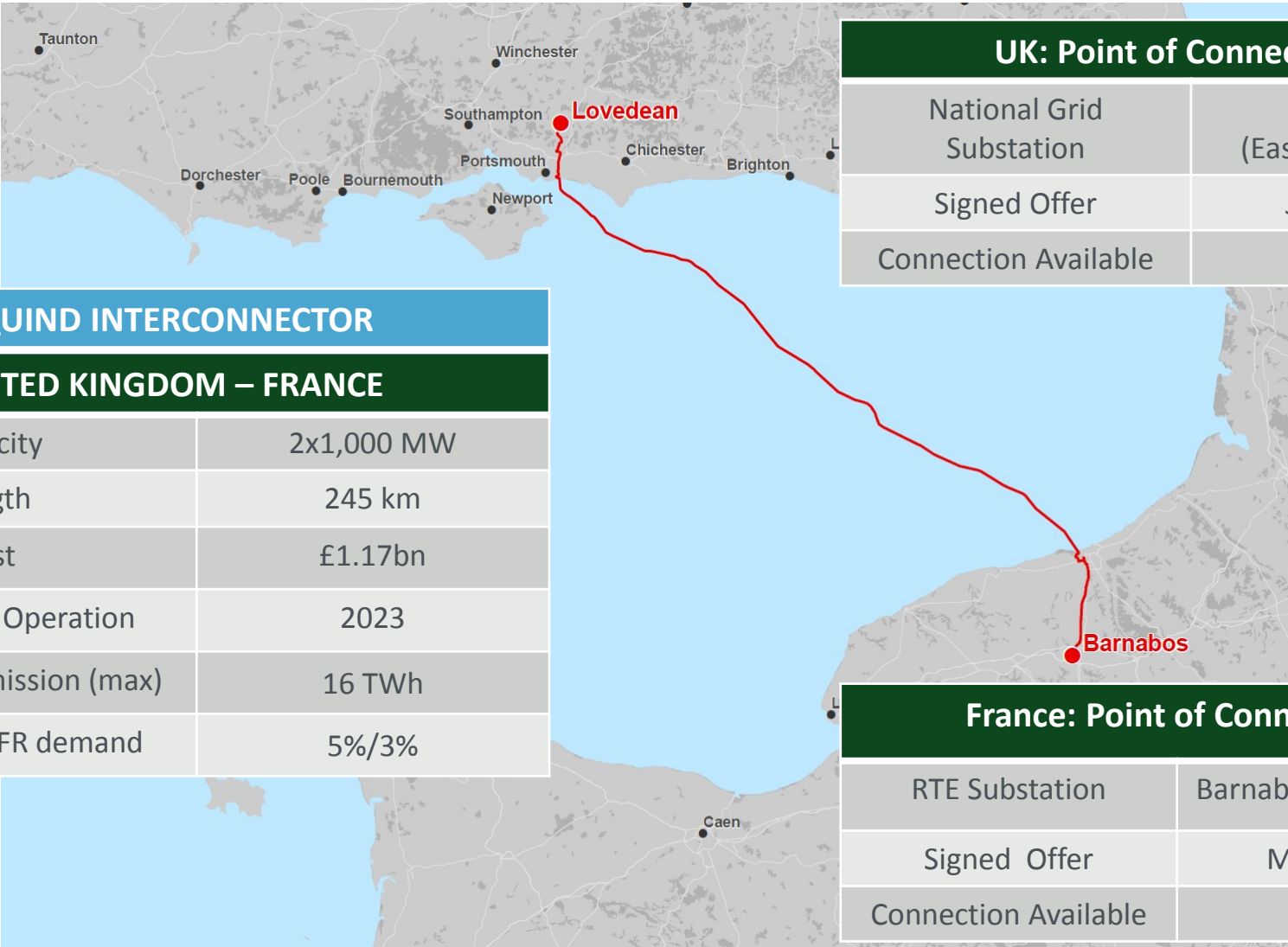


PROPOSALS FOR AQUIND INTERCONNECTOR

EASTNEY & MILTON ALLOTMENT HOLDERS ASSOCIATION
22 NOVEMBER 2019



OVERVIEW OF AQUIND INTERCONNECTOR



UK: Point of Connection

National Grid Substation	Lovedean (East Hampshire)
Signed Offer	June 2016
Connection Available	2022

AQUIND INTERCONNECTOR

UNITED KINGDOM – FRANCE

Capacity	2x1,000 MW
Length	245 km
Cost	£1.17bn
Commercial Operation	2023
Annual Transmission (max)	16 TWh
Share of UK/FR demand	5%/3%

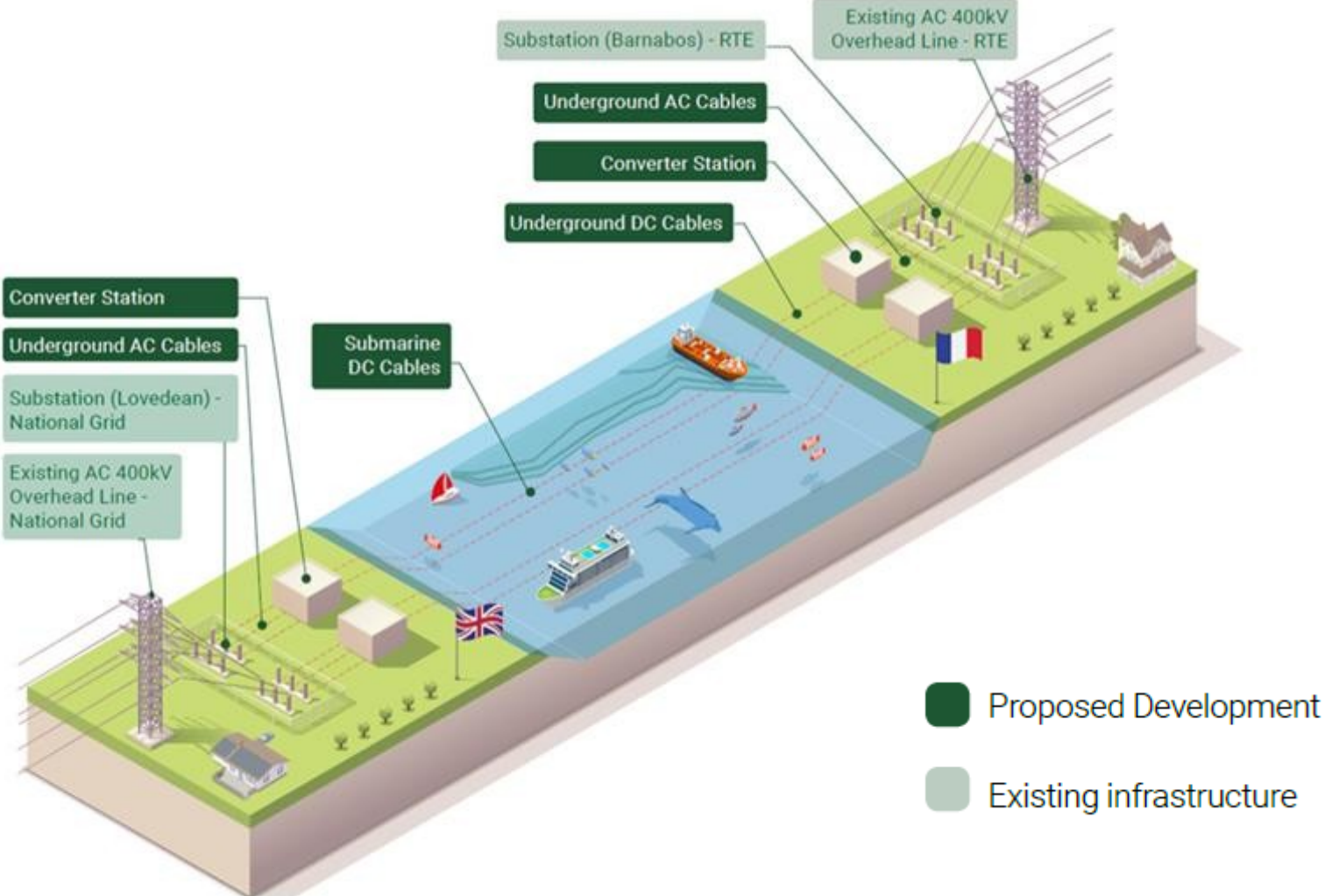
France: Point of Connection

RTE Substation	Barnabos (Normandie)
Signed Offer	March 2017
Connection Available	2022

BENEFITS OF AQUIND INTERCONNECTOR (GB)

AQUIND benefits	GB	Comments
Security of supply	✓	Benefits apply to GB and France as the interconnector is bi-directional and can respond to system needs (i.e. price spikes) in both countries
Competition	✓	AQUIND will provide market participants in GB and France access to each market, and to other connected European markets providing the opportunity to trade across Europe
Benefits to consumers	✓	Consumers in GB will typically benefit from cheaper imports from France via AQUIND, as power flows from the cheaper French market to the more expensive GB market
Sustainability/renewable deployment	✓	Renewable dispatch across Europe is facilitated by AQUIND as market access is increased with greater cross-border capacity, unlocking renewables and decreasing carbon emissions
Ancillary services	✓	AQUIND will offer system services to the TSOs (National Grid in GB and RTE in France) to help manage system needs (such as short-term frequency fluctuations)

KEY ELEMENTS OF AQUIND INTERCONNECTOR



UK ONSHORE ELEMENTS

- ❖ Works at the existing National Grid Lovedean substation in Hampshire where AQUIND Interconnector will connect to the existing GB grid;
- ❖ Underground alternating current ('AC') cables, connecting Lovedean substation to the proposed nearby converter station;
- ❖ Construction of a Converter Station comprising a mix of buildings and outdoor electrical equipment;
- ❖ Two pairs of direct current ('DC') cables with one fibre optic cable of smaller diameter per pair of cables for data transmission from the proposed landfall site in Eastney to the converter station at Lovedean. The cables will be approximately 20 km in length and the intention is to locate the cables within existing highway or road verges where practicable.





THE STORY SO FAR



- ❖ **2014:** Work on AQUIND Interconnector begins by identifying that an interconnector between the UK and France would be the most efficient and beneficial.
- ❖ **2015:** National Grid confirms the existing Lovedean substation as the preferred connection point to the GB electricity network for AQUIND Interconnector.
- ❖ **2016:** AQUIND signs connection agreement with National Grid to connect into the GB electricity network at the existing Lovedean substation and Ofgem grants an interconnector licence.
- ❖ **January 2018:** Public consultation on the emerging proposals for AQUIND Interconnector
- ❖ **April 2018:** AQUIND is awarded Project of Common Interest (PCI) status by the European Commission

- ❖ **July 2018:** The Secretary of State directs that AQUIND Interconnector should be treated as a Nationally Significant Infrastructure Project (NSIP).
- ❖ **February – April 2019:** AQUIND undertakes statutory consultation on its proposals in preparation for the submission of a Development Consent Order (DCO) application
- ❖ **April – November:** AQUIND reviews consultation responses and conducts further investigative work prior to finalise the proposals before submitting a DCO application
- ❖ **14 November 2019:** AQUIND submit DCO application to the Planning Inspectorate who will consider it and make a recommendation to the Secretary of State.



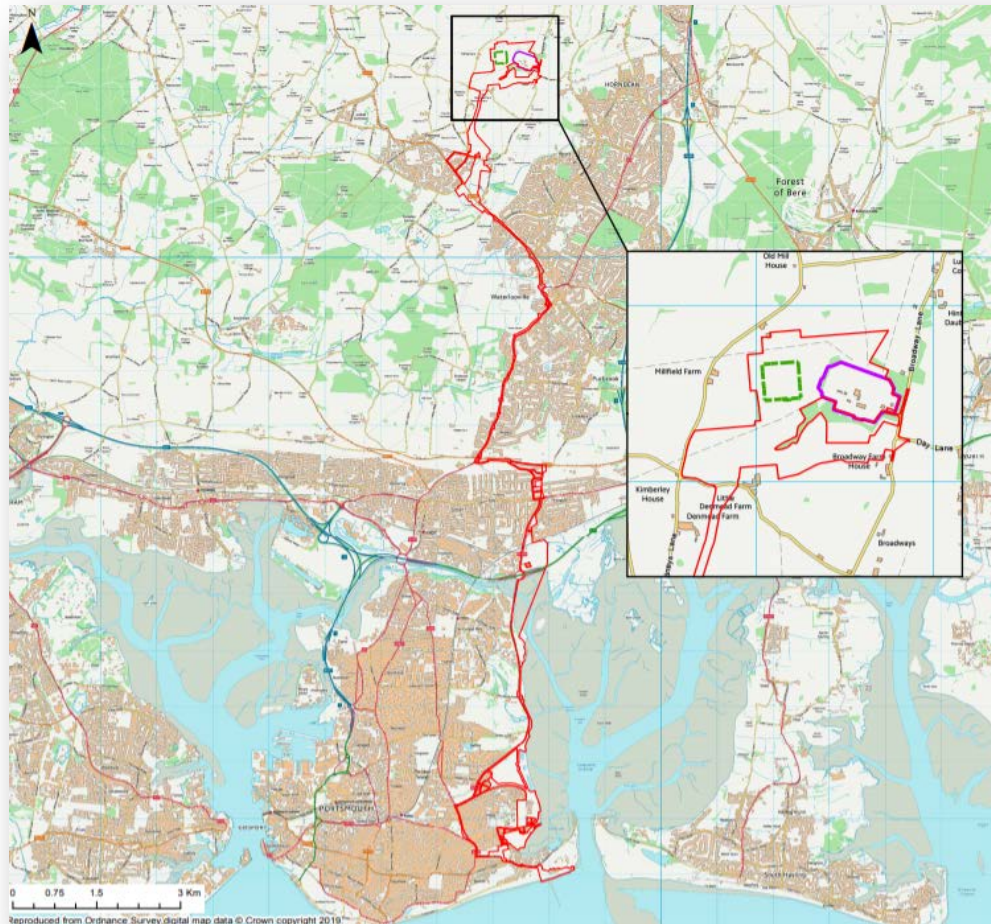
THE ONSHORE CABLE ROUTE



- ❖ The following slides illustrate the Red-Line Boundary (RLB) that was presented during the February – April 2019 consultation.
- ❖ We will now discuss and verbally note an alterations to the RLB since the close of the consultation.

OVERVIEW OF THE ONSHORE CABLE ROUTE (FEB-APR 2019 CONSULTATION)

- ❖ The proposed corridor in which the onshore cable will be located runs from the proposed Converter Station at Lovedean to the landfall at Eastney – a route of approximately 20km.



Key

- Site Boundary
- Indicative Converter Station Location
- Existing Substation Boundary



FEBRUARY – APRIL 2019 CONSULTATION



STATUTORY CONSULTATION (FEBRUARY – APRIL 2019)

- ❖ **LPA's consulted** on Statement of Community Consultation (SoCC) before consultation began;
- ❖ Consultation ran from **27 February to 29 April 2019**;
- ❖ **9 public exhibition events**, including four in Portsmouth;
- ❖ **10 deposit locations**, including four in Portsmouth;
- ❖ **16,951 direct invitations issued** to those within the vicinity of the proposals;
- ❖ Facebook adverts **viewed by over 115,000 people**;
- ❖ **4,467** website users;
- ❖ **Circa 200,000** combined circulation of newspaper notices.

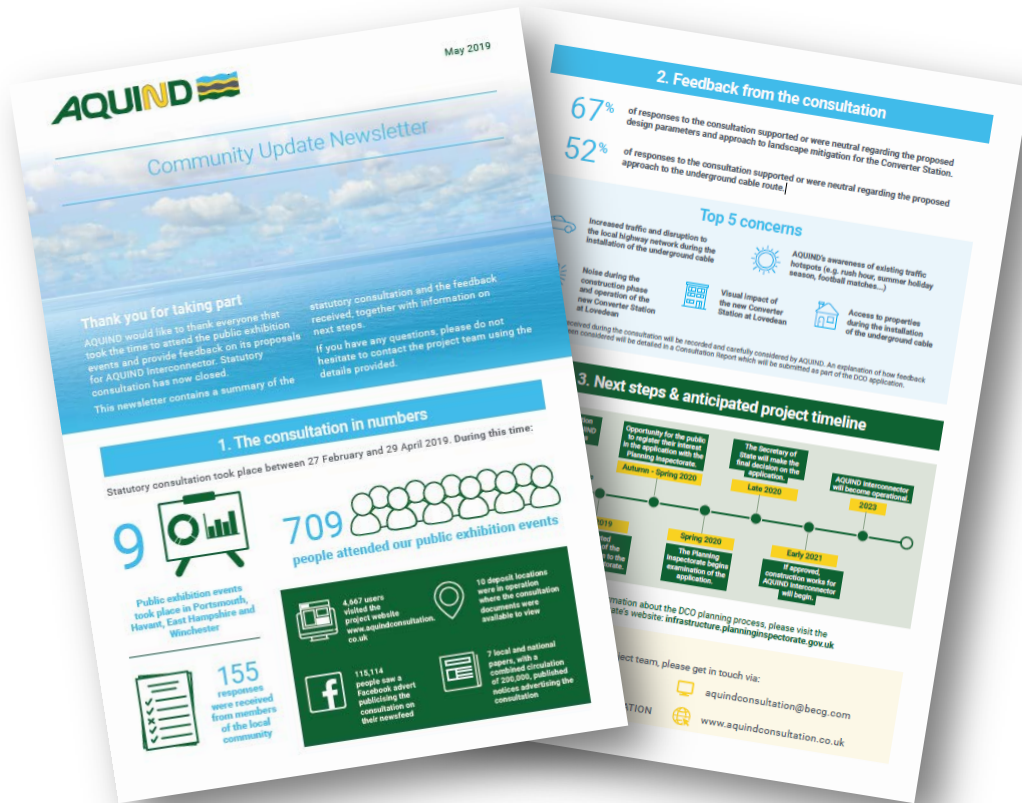




WORK UNDERTAKEN SINCE APRIL 2019







UPDATING THE COMMUNITY



The community update newsletter (May 19)

- ❖ Community update newsletter issued to interested residents/parties and stakeholders in May 2019;
- ❖ The communications channels (e.g. website, freephone, email and freepost) will continue to remain active.

Website aquindconsultation.co.uk	Freephone 01962 893 869	Email aquindconsultation@becg.com	Freepost AQUIND CONSULTATION
			

- ❖ **Regular meetings held with officers and councillors** at Portsmouth City Council, East Hampshire District Council, Havant Borough Council, Winchester City Council and Hampshire County Council;
- ❖ **Environmental and technical surveys** undertaken to inform the final DCO application;
- ❖ **Refinement of the Order Limits**, eliminating some of the options presented during the February – April 2019 consultation;
- ❖ **Environmental Impact Assessment (EIA) being undertaken** to inform potential impacts and appropriate mitigation measures.

HORIZONTAL DIRECTIONAL DRILLING (HDD) ILLUSTRATION





DCO PROCESS & NEXT STEPS



Submission

- To the Planning Inspectorate (PINS) on behalf of Secretary of State (BEIS);
- This will include a draft of the proposed DCO and a Consultation Report summarising how the applicant has had regard to consultation responses.

Acceptance

- 28-day period for PINS to decide whether application meets requirements to be accepted for examination.

Pre-examination

- Applicant publishes notice that the application has been submitted and accepted by PINS;
- **REGISTRATION PERIOD:** 30-day period for the public and statutory consultees to become an Interested Party and make a Relevant Representation on the application in writing;
- PINS appoint Examining Authority.

Examination

- 6 month examination;
- Interested Parties are invited to provide more details on their views in writing;
- Questions from Examining Authority to all parties, open floor hearings and issue specific hearings;
- Intense period – mostly done in writing. Tight deadlines for responses, sometimes overnight – schemes of delegation;

Recommendation and Decision

- Examining Authority has 3 months to make a recommendation to Secretary of State;
- Secretary of State has a further 3 months to make a decision, taking into account the local impacts.

ANTICIPATED PROJECT TIMELINE

- ❖ **14 November 2019:** AQUIND submit an application for a Development Consent Order (DCO) to the Planning Inspectorate (PINS);
- ❖ **Mid-December 2019:** PINS to make a decision on whether to accept the application for Examination;
- ❖ **Late 2019 to Early 2020:** Opportunity for the public to register their interest in the application with PINS;
- ❖ **Spring 2020 to Autumn 2020:** Examination of the DCO application;
- ❖ **Early 2021:** Secretary of State (BEIS) to make the final decision on the DCO application;
- ❖ **2021:** If approved, construction works for AQUIND Interconnector to begin.

- ❖ **Information Line**

01962 893869 (Mon to Fri, 09:00-17:30)

- ❖ **Email**

Aquindconsultation@becg.com

- ❖ **Register for Updates**

Please see the News and Events section of the Aquind Consultation Website



**THANK YOU.
ANY QUESTIONS?**





AQUIND INTERCONNECTOR

BRIEFING NOTE: The Development Consent Order Process

INTRODUCTION

AQUIND Limited is developing proposals to build and operate AQUIND Interconnector – a new marine and underground electricity transmission link between the south coast of England and Normandy in France.

In July 2018, the Secretary of State for Business, Energy & Industrial Strategy directed that AQUIND Interconnector should be treated as a Nationally Significant Infrastructure Project (NSIP).

To grant the rights required to build and operate AQUIND Interconnector in the UK, AQUIND is therefore required to submit an application for a Development Consent Order (DCO) to the Planning Inspectorate (PINS).

PINS will examine the application in public before making a recommendation to the Secretary of State for Business, Energy & Industrial Strategy who will make the final decision, taking into account the local impacts of the proposal.

We have prepared this briefing note to explain the next steps in the DCO process, which we hope you will find useful.

If you have any questions, please do not hesitate to contact the project team using the details provided.

THE DEVELOPMENT CONSENT ORDER PROCESS

The following table provides a summary of the next steps in the DCO process. Additional information, including further reading, is provided at the end of this briefing note.

Acceptance	<p>Following the submission of the application, PINS will make a decision on whether the application meets the standard required to be examined.</p> <p>During this stage, PINS will check the application documents and plans to make sure all the required information is included.</p> <p>PINS will also ask the relevant local authorities to provide a representation regarding the adequacy of the Applicant's pre-application consultation.</p> <p>The acceptance stage takes up to 28 days.</p> <p>The Applicant is required to publicise the acceptance of the application locally, making clear where the application documents can be viewed and how local residents and stakeholders can register their interest in the application with PINS.</p>
Pre-Examination	<p>If the application is accepted by PINS, an Examining Authority will be appointed. The Examining Authority may comprise a single Examining Inspector or a panel of up to five Examining Inspectors.</p> <p>At this stage, the public will be able to register with PINS and provide a summary of their views of the application in writing by submitting a 'Relevant Representation' in order to become an Interested Party.</p> <p>At the Pre-Examination stage interested parties will be invited to attend a Preliminary Meeting. This Meeting is run and chaired by the Examining Authority and its purpose is to discuss how the application will be examined.</p> <p>The Pre-Examination stage takes approximately 3 months from the point that the Applicant publicises the acceptance of its application locally.</p>
Examination	<p>The Examining Authority has a maximum of 6 months to carry out the Examination.</p> <p>The Examination is primarily a written process and during this stage, Interested Parties are invited to provide more details of their views in writing. The Examining Authority will also ask written questions.</p> <p>Public hearings may be held, including open floor, issue specific, and compulsory acquisition hearings.</p>
Decision	<p>The Examining Authority must prepare a report on the Examination of the application to the relevant Secretary of State, including a recommendation about whether to grant or refuse development consent.</p> <p>The Examining Authority must make the recommendation to the Secretary of State within 3 months of the close of the examination.</p> <p>Following receipt of the Examining Authority's Recommendation Report, the Secretary of State has 3 months to make the decision to grant or refuse development consent.</p>
Post-Decision	<p>Once a Decision has been issued by the Secretary of State, there is a 6 week period in which the Decision may be challenged.</p> <p>If a decision is made to grant development consent, local authorities play an important role in the discharge Requirements (i.e. planning conditions) and also to enforce the terms of a DCO.</p>

TIMELINE

- Late 2019:** AQUIND to submit its DCO application to PINS.
- Late 2019:** PINS to make a decision on whether to accept the application for Examination.
- Late 2019 to Early 2020:** Opportunity for the public to register their interest in the application with PINS.
- Spring 2020 to Autumn 2020:** Examination of the DCO application.
- Early 2021:** Secretary of State to make the final decision on the DCO application.
- 2021:** If approved, construction works for AQUIND Interconnector to begin.
- 2023:** AQUIND Interconnector to become operational.

USEFUL SOURCES

Further information regarding the DCO process is available at: <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2013/04/Advice-note-8.0.pdf>

Further information regarding the role of local authorities in the DCO process is available at: https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2015/03/Advice_note_2.pdf

CONTACT US

We hope you found this briefing note useful. If you have any questions, please do not hesitate to contact the project team via:

Website: www.aquindconsultation.co.uk

Email: aquindconsultation@becg.com

Freephone: **01962 893 869**

Freepost: **AQUIND CONSULTATION**

Rt Hon Penny Mordaunt MP

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

20th October 2020

AQUIND Interconnector

Dear Ms Mordaunt,

Further to your recent open letter to the Planning Inspectorate dated 5^h October 2020, I wanted to write to provide clarity on some of the matters raised in your correspondence.

As you will be aware, AQUIND first undertook consultation in relation to the proposals for AQUIND Interconnector with the local community between 3 January to 24 February 2018 over an 8-week period. A further round of consultation in relation to the then more advanced proposals for AQUIND Interconnector was carried out between 27 February to 29 April 2019. During these consultations feedback was received from the local communities, and it is not correct or fair to state that responses to either of these consultations voiced significant opposition to the proposals, nor that these consultations were not clear in explaining the proposals. Any questions received in relation to the proposals either during or outside of these consultations have been responded to clearly and in good time.

A summary of the feedback received from both of these consultations is available to view in the Consultation Report¹ submitted in support of the Application. It should be noted that the Planning Inspectorate on behalf of the Secretary of State confirmed that the consultation undertaken has met the legal requirements for an adequate consultation.

With regard to your comments concerning the temporary impacts of the proposals during the cable installation process, it is important to note that, through the aforementioned public consultations, AQUIND has given particular consideration to feedback received relating to the temporary impacts on highways and traffic flows. Following feedback received from stakeholders since introducing them to the proposals in early 2017 and from the local communities during the public consultations undertaken before submitting the application for a Development Consent Order (DCO), many of the more sensitive locations of the cable corridor were either significantly reduced or removed altogether.

In Portsmouth, for example, areas of Bransbury Road, Milton Road, Velder Avenue and Eastern Road were removed from the cable corridor following feedback from the local community, local authorities and other stakeholders, through the utilisation of verges and proposals for a route through Milton Common. These changes were clearly communicated to all interested parties via our [Acceptance Update Newsletter](#).

¹ <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN020022/EN020022-000478-5.1%20Consultation%20Report.pdf>

Although temporary traffic management measures will be required during the installation of the cables, road closures will be avoided save for in very limited instances and access to homes and businesses will be maintained throughout the construction phase. No part of the proposal is located in any private homes or gardens.

In addition, a Framework Traffic Management Strategy² (FTMS) was submitted with the DCO application which contains a range of proposed mitigation measures and an indicative construction programme that accounts for environmental constraints, major public events, school term times and other restrictions to minimise the impact. Such mitigation includes overnight working in specific areas, including along sections of Eastern Road, to minimise the duration of the installation period and in turn the period of disruption in this area.

The selection of the location for the proposals for AQUIND Interconnector was determined by an assessment of the reasonable alternatives, which applied a process of staged filtering, increasing knowledge of the individual options, so as to proportionately consider them from a technical, cost and environmental perspective. Key to this exercise was the identification of whether the potential option could proceed and also whether they had a realistic prospect of delivering the same infrastructure capacity (including energy security and climate change benefits) in the same timescale. A proportionate multi-disciplinary approach was taken to the assessment of the reasonable alternatives, taking into account considerations relevant to and specialist input from experts in the field of electrical engineering, cable engineering, the environment, planning and civil engineering in respect of both the onshore and marine environments.

In relation to the location of the Converter Station, which is a factor in determining the location of the landfall and the onshore cable route, Lovedean substation was identified as the preferred connection location for AQUIND Interconnector following the assessment of the reasonable alternative connection locations by AQUIND. This process has taken into account assessments undertaken by National Grid, who have an obligation to develop and maintain an efficient, coordinated and economical electricity transmission network. The assessment undertaken by National Grid considers factors such as National Grid's knowledge of the existing network (including agreed future connections), agreed cost information, environmental considerations and other constraints associated with the Proposed Development, alongside input from AQUIND on the details of the assets to be connected.

AQUIND has also undertaken detailed assessments of alternative landfall locations and onshore cable routes in relation to connections to alternative connection locations considered, and in relation to the connection at Lovedean.

Further information on the consideration of the reasonable alternatives studied by AQUIND for the connection locations, the location of the landfall and for the onshore cable route can be found in the 'Alternatives' chapter of the Environmental Statement (ES)³, and the Supplementary Alternatives chapter included as part of the ES Addendum⁴.

² https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN020022/EN020022-001567-6.3.22.1A%20ES%20-%20Vol%203%20-%20Framework%20Traffic%20Management%20Strategy%20Rev002_clean.pdf

³ <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN020022/EN020022-000570-6.1.2%20ES%20-%20Vol%201%20-%20Chapter%202%20Consideration%20of%20Alternatives.pdf>

⁴ <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN020022/EN020022-001488-7.8.1.3%20ES%20Addendum%20-%20Appendix%203%20Supplementary%20Alternatives%20Chapter.pdf>

With regard to the impact of the Converter Station on the South Downs National Park (SDNP), we reconfirm that the Converter Station sits outside of the boundaries of the SDNP. AQUIND has carefully considered the impacts of the proposals and of the alternative proposals on the SDNP as part of its assessment of the reasonable alternatives, and further as part of the design and further environmental impact assessments undertaken in relation to the proposals for the location of the Converter Station in proximity to the existing Lovedean substation. AQUIND has also undertaken substantial consultation with relevant stakeholders, including Winchester City Council, East Hampshire District Council and South Downs National Park Authority on the spatial parameters and 'design principles' which the final design of the Converter Station will be required to comply with. These discussions have informed the development of these principles, including the use of autumnal colours and the use of horizontal cladding, which will minimise the impact upon the setting of the National Park.

In your letter to the Planning Inspectorate, you also raised concerns regarding "*short notice*" and "*last minute*" changes to the cable route and that these are causing a degree of uncertainty for local residents.

However, no changes to the Proposed Development have been made that result in any new location being introduced or installation methodology being used that would be different from those proposed during the consultation in 2019 or submitted in the DCO application. In fact, during the pause in the progression of the Examination of the DCO application as a result of the COVID-19 pandemic, AQUIND has continued in its efforts to engage with stakeholders and to take into account new information where available. In doing so, a focus has been on considering the options to reduce the cable corridor following the receipt of further feedback following the submission of the DCO application to ensure that the potential temporary impacts associated with the installation of the underground cables are minimised.

As part of the ongoing Examination of the DCO application, AQUIND has recently submitted updated Land Plans which include a number of amendments to the cable corridor. Save for in one limited instance where a small parcel of land has been added to the Order limits to accommodate a slight shift in the alignment of the onshore cable corridor to avoid the need to fell trees in this location, the Order limits and consequently the land potentially affected has been reduced.

In respect of the Milton Allotments, **no allotment plots will be affected by the construction or operation of AQUIND Interconnector. At no point has it been proposed to "clear" any allotments.**

Cables are to be installed under the allotments and Milton Locks Nature Reserve via a process known as Horizontal Directional Drilling (HDD), which will take place between the car park located west of the Thatched House Pub and the grassed area east of Kingsley Road. This approach allows cables to be installed deep underground with no impact at surface level. To allow for inspections during construction and operation, AQUIND is seeking access rights only over some existing paths and internal roads of the allotments site only.

This approach was communicated to all stakeholders, including Portsmouth City Council, on a number of occasions in advance of the submission of the DCO application and clearly provided for in the DCO application when submitted. Until now no concerns with this approach had been expressed. On review the plans submitted did not show the area over which access only may be taken correctly, and to clarify this the areas shown that covered actual allotments plots have been removed from the Land Plans. This clarification was communicated to Portsmouth City Council at a teleconference on 28 September in advance of the submission of this information at Deadline 1 of the Examination. We are perplexed that, notwithstanding the clarification on this teleconference, concerns were subsequently publicly voiced by the Council which supported this misunderstanding that the cables would be routed through the allotments and that allotment plots may be affected.

With regard to your concerns about the potential disruption to wildlife in the wider Portsmouth area, the Onshore Ecology chapter of the Environmental Statement⁵ (ES) sets out the likely effects and proposed mitigation in relation to onshore ecology, as well as detail of all surveys undertaken. A Non-Technical Summary⁶ is also available, which provides an overview of the likely impacts and effects. Further detail regarding the relevant European sites can be found within the Habitats Regulations Assessment Report⁷.

Please be assured that mitigation has been embedded within the design of the project to mitigate identified impacts. This includes, for example, using the deep drilling technique known as Horizontal Directional Drilling ('HDD') between Kendall's Wharf and Farlington beneath Langstone Harbour, beneath the Eastney and Milton Allotments and Milton Locks Nature Reserve, and beneath Denmead Meadows, to avoid the loss of and impacts on these habitats.

Additional mitigation measures will be employed to control potential adverse effects on ecological features during construction. These include pollution control measures, in line with UK Government guidance to avoid discharge to watercourses and dust suppression measures to manage dust and prevent it from affecting sensitive habitats. Construction will also be restricted to daylight hours, between dawn and dusk in areas which do not have public street lighting to avoid disturbance effects of noise and lighting on bats during the bats active season (with the exception of work at Farlington Playing Fields where works will be setback 10m from edge habitats to preserve bat flight lines and light spill avoided using hooded/cowled lighting)⁸.

A comprehensive explanation of proposed mitigation measures to be undertaken during construction is included within the Onshore Outline Construction Environmental Management Plan ('CEMP')⁹.

For detail regarding the proposed mitigation at Langstone Harbour please refer to the Marine Outline CEMP¹⁰.

We also wanted to take this opportunity to re-iterate some of the significant benefits AQUIND Interconnector will bring, including providing households in the South East of England with savings on their electricity bills. The project will result in the net reduction of CO2 emissions by at least 1.5 million tonnes over the lifetime of the project, in addition to creating around 500 jobs through the UK onshore and marine construction phases. It is also expected that the interconnectors will play a major role in achieving the Net Zero 2050 targets as the Government formulates strategies of

⁵ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-000584-6.1.16%20ES%20-%20Vol%201%20-%20Chapter%2016%20Onshore%20Ecology.pdf>

⁶ https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-001578-6.4%20ES%20-%20Vol%204%20-%20Non-Technical%20Summary%20Rev002_clean.pdf

⁷ https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-001580-6.8.1%20HRA%20-%20Vol%201%20-%20Habitats%20Regulations%20Assessment%20Report%20Main%20Text%20Rev002_clean.pdf

⁸ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-000584-6.1.16%20ES%20-%20Vol%201%20-%20Chapter%2016%20Onshore%20Ecology.pdf>

⁹ https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-001586-6.9%20Onshore%20Outline%20Construction%20Environmental%20Management%20Plan%20Rev002_clean.pdf

¹⁰ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-000942-6.5%20Marine%20Outline%20Construction%20Environmental%20Management%20Plan.pdf>

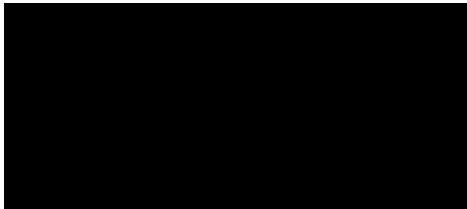
achieving those targets. More information on the need for and benefits of AQUIND Interconnector is available in the Needs and Benefits Report¹¹ and the Needs and Benefits Addendum¹².

We do hope this information is helpful in addressing some of your concerns. Further to our letter of 28th August, we would like to re-extend our offer of a meeting to discuss the proposals with you, should this be of interest. If we may, a member of our project team will be in touch in the coming days in the hope of finding a mutually convenient time.

In the meantime, if you would like to get in touch with the project team, please contact us via our freephone information line on 01962 893869, or via email at aquindconsultation@becg.com and we will be happy to discuss further.

For the purposes of transparency, a copy of this letter will also be provided to the Planning Inspectorate.

Yours sincerely,



Richard Glasspool (BA, FCA)
Director

AQUIND Limited

¹¹ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-000568-5.6%20Needs%20and%20Benefits%20Report.pdf>

¹² <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-001635-7.7.7%20Needs%20and%20Benefits%20Addendum%20WQ%20MG1.1.27.pdf>



Freephone: 01962 893 869

Email: aquindconsultation@becg.com

Website: www.aquindconsultation.co.uk

Freepost: AQUIND CONSULTATION

Mr. Trevor Stark
Chairman
Eastney and Milton Allotment Holders Association Committee

20 October 2020

AQUIND Interconnector

Dear Mr Stark,

I am writing to you, in your capacity as Chairman of the Eastney and Milton Allotment Holders Association, to provide clarity in response to concerns raised regarding the potential impact of AQUIND Interconnector ('the Project') on the Eastney and Milton Allotments and the adjacent Milton Locks Nature Reserve.

At no point has it been proposed to “clear” any allotments and AQUIND confirm no allotment plots will be cleared as part of the construction, operation or maintenance of the Project.

The Project's cables are to be installed under the allotments and Milton Locks Nature Reserve via a process known as Horizontal Directional Drilling (HDD), which will take place between the car park located west of the Thatched House Pub and the grassed area east of Kingsley Road. This approach allows the cables to be installed deep underground with no impact at surface level. To allow for inspections during construction and operation, AQUIND is seeking access rights over some existing paths and internal roads of the allotments site but not over any of the allotment plots.

The cables that AQUIND will install along the onshore cable route will be delivered and laid in sections between joint bays at different locations along the route. The locations of the joint bays will be determined as part of the detailed design process and will depend on physical characteristics such as space availability, as well as minimising impact when maintenance is required. On behalf of AQUIND, I confirm there will not be any joint bays located on the allotments and the adjacent Milton Locks Nature Reserve as, whilst the joint bays will be below ground level, they are positioned close to the drilling locations, with the cables pulled through the ducts installed via HDD between them. In addition, maintenance activities associated with HDD cable sections will take place at the joint bays.

This installation method is tried and tested on numerous other cabling projects around the world and the maintenance requirements are minimal. The types of maintenance can be classified into two categories; scheduled maintenance and unscheduled maintenance.

Scheduled Maintenance – This would consist of walk over inspections of the cable route to ensure activities are not taking place above the cable route which could impact its operation (e.g. deep excavation or piling). The frequency of the walk over surveys would typically be once per quarter. In the allotments, this would consist of a short walk over the existing paths to undertake a visual inspection of the areas which will sit above the cables.

Other scheduled maintenance activities in relation to the cable route include taking readings from a number of underground link boxes and above ground link pillars located along the cable route. There will be up to 6 link boxes and up to 6 link pillars per cable circuit along the onshore cable route and these will be installed adjacent to the joint bays. As mentioned above, AQUIND will not install any joint



Freephone: 01962 893 869

Email: aquindconsultation@becg.com

Website: www.aquindconsultation.co.uk

Freepost: AQUIND CONSULTATION

bays on the allotments and the adjacent Milton Locks Nature Reserve as they are to be installed close to the drilling location and, as a result, they also won't install any link boxes/link pillars on the allotments either.

Unscheduled Maintenance – This would consist of repairing a cable in the rare event of a cable fault and would comprise removing the section of cable in which the fault was present and replacing it with a new section of cable. In areas where HDD is used to install cables, any replacement would take place by removing the section of cable between the two joint bays either side of the section of cable in question, then pulling a new section of cable through the underground duct already installed and jointing the new section of cable to the existing cables at the two joint bays in question. This means that, in the very unlikely event there was a cable fault along the section of cables to be installed under the allotments, the repair of that section would be undertaken from joint bays located off the allotments.

I hope this letter provides some clarity and I would be most grateful if you could share this information with your fellow allotment holders to ensure they are in receipt of accurate information regarding the Project.

We are committed to engaging with representatives of the Allotment Holders Associations, and other stakeholders, throughout the Examination process. If you have any other questions, please contact us via our freephone information line on 01962 893869, or via email at aquindconsultation@becg.com.

Further information on the proposed development is also available on our dedicated project website at www.aquindconsultation.co.uk.

Yours sincerely,

James Wood

AQUIND Interconnector – Community Engagement Team