

Rt Hon Penny Mordaunt MP

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20<sup>th</sup> October 2020

### **AQUIND Interconnector**

Dear Ms Mordaunt,

Further to your recent open letter to the Planning Inspectorate dated 5<sup>h</sup> 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 Report<sup>1</sup> 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](#).

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<sup>1</sup> <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 Strategy<sup>2</sup> (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)<sup>3</sup>, and the Supplementary Alternatives chapter included as part of the ES Addendum<sup>4</sup>.

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<sup>2</sup> [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](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)

<sup>3</sup> <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>

<sup>4</sup> <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 Statement<sup>5</sup> (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 Summary<sup>6</sup> 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 Report<sup>7</sup>.

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)<sup>8</sup>.

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

For detail regarding the proposed mitigation at Langstone Harbour please refer to the Marine Outline CEMP<sup>10</sup>.

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

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<sup>5</sup> <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>

<sup>6</sup> [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](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)

<sup>7</sup> [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](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)

<sup>8</sup> <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>

<sup>9</sup> [https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-001586-6.9%20Onshore%20Outline%20Construction%20Environmental%20Management%20Plan%20Rev002\\_clean.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-001586-6.9%20Onshore%20Outline%20Construction%20Environmental%20Management%20Plan%20Rev002_clean.pdf)

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

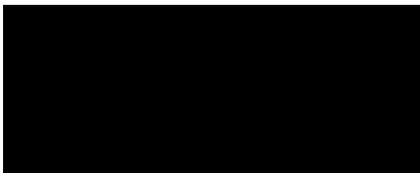
achieving those targets. More information on the need for and benefits of AQUIND Interconnector is available in the Needs and Benefits Report<sup>11</sup> and the Needs and Benefits Addendum<sup>12</sup>.

We do hope this information is helpful in addressing some of your concerns. Further to our letter of 28<sup>th</sup> 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](mailto: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

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

<sup>12</sup> <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-001635-7.7%20Needs%20and%20Benefits%20Addendum%20WQ%20MG1.1.27.pdf>



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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



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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](mailto:aquindconsultation@becg.com).

Further information on the proposed development is also available on our dedicated project website at [www.aquindconsultation.co.uk](http://www.aquindconsultation.co.uk).

Yours sincerely,

James Wood

**AQUIND Interconnector – Community Engagement Team**