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AQUIND Limited
National Grid Electricity System
Operator Ltd

Your Ref:

Our Ref: EN020022

Date: 27 October 2020

Dear Sir/ Madam

Planning Act 2008 (as amended) and The Infrastructure Planning (Examination Procedure) Rules 2010 - Rule 17

Application by AQUIND Limited for an Order Granting Development Consent for the AQUIND Interconnector Project

Request for further information

We write to request further information from National Grid ESO (NGESO) and the Applicant under Rule 17 of the Infrastructure Planning (Examination Procedures) Rules 2010.

Question to NGESO

By way of background, we are currently examining the application for development consent for the AQUIND interconnector on behalf of the Secretary of State for Business, Energy and Industrial Strategy. Full details can be found on the Planning Inspectorate's National Infrastructure website at:

<https://infrastructure.planninginspectorate.gov.uk/projects/south-east/aquind-interconnector/>

In our first written questions, we asked the following question to National Grid Electricity Transmission plc (NGET) and the South Downs National Park Authority (Reference EIA1.6.2):

'In its Relevant Representation [RR-049], the South Downs National Park Authority drew attention to National Grid's duties under s62 of the Environment Act as a Statutory Undertaker to have regard to the purposes of the South Downs National Park. It suggested that there is only limited evidence of how National Grid met these duties and that it would be seeking further information from National Grid:

"National Grid is a Statutory Undertaker and therefore, as per section 62 of the Environment Act 1995, they are required to have regard to the purposes of the National Park in their decision making. It is not clear whether the assessment of

alternatives (set out in the Environmental Statement Chapter 2: Consideration of Alternatives) by National Grid when preparing the NGET feasibility study in 2014 took into account the impact of the various options on the National Park. There is only limited information on how that duty has been met and the SDNPA will be seeking further information on this from National Grid."

Have negotiations continued and is there any update to report?

Could the South Downs National Park Authority explain if, in its view, the Proposed Development would affect the statutory purposes for which the National Park was designated?

Further, does it believe that there any distinction between the effects of Option B (i) and B(ii) in relation to their effects on the statutory purposes of the National Park? Please could NGET explain if and how you had regard to the statutory purposes of the South Downs National Park designation in preparing the 2014 feasibility study referred to in Chapter 2 of the ES [APP-117].'

The response that we received from NGET was as follows:

'Within the National Grid group there are a number of different business, operating separately, and each playing a role in the UK energy industry, transporting energy from producers to local network operators.

NGET is an electricity network business and is a subsidiary of National Grid plc. It owns and operate the regulated electricity transmission network in England and Wales. NGET's network comprises approximately 7,211 kilometres of overhead line, 2,279 kilometres of underground cable and 347 substations.

NGET has had business separation obligations in its licence for a long time, requiring it to be separate from National Grid group businesses operating in the markets of Interconnectors, Carbon Capture and Storage and Offshore Transmission. With effect from 1 April 2019, following the creation of National Grid Electricity System Operator Ltd (NGESO), NGET's business separation obligations were updated to require separation from NGESO.

NGESO's role is to balance the system making sure supply meets demand and move high voltage electricity from where it's generated, such as a wind farm, through the energy system. It operates the system but is not responsible for the infrastructure (e.g. the pylons and cables) needed to carry the electricity. Using the infrastructure owned by three transmission companies (including NGET) the high voltage electricity is passed onto one of the fourteen Distribution Network Operators (DNOs) across the country.

The DNOs own the local networks; they convert the electricity into a more manageable voltage suitable for domestic use and feed low voltage electricity through to homes and businesses.

NGET and NGESO are legally separate companies operating within the National Grid group as separate businesses. Since separation in 2019, interactions between the two businesses are formalised and NGET is not in a position to respond to the Examining Authority on matters which are the responsibility of NGESO.'

In light of this response, the Examining Authority now requests NGESO to provide an answer to the original question, and to explain if and how you had regard to the statutory purposes of the South Downs National Park designation in preparing the 2014 feasibility study referred to in Chapter 2 of the Environmental Statement. For ease of reference, the document in question carries the Examination Library reference [APP-117] and can be found at:

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

Question to the Applicant

Does the Applicant have any further information in relation to this, and will it be pursuing a response that will help to conclude the matter?

Deadline for response to this request

NGESO and the Applicant are requested to provide this information to the Examining Authority by no later than **Deadline 5** in the Examination Timetable, Monday 30 November 2020. If you have any questions about any of the matters raised in this correspondence, please contact the Case Team using the details provided at the top of this letter.

Yours faithfully

Andrew Mahon

Lead Member of the Panel of Examining Inspectors