



AQUIND Limited

AQUIND INTERCONNECTOR

Applicant's Response to Deadline 1
Submission from persons who have not
registered as Interested Parties

The Planning Act 2008

Infrastructure Planning (Examination Procedure) Rules 2010 – Rule 17

Document Ref: 7.9.7

PINS Ref.: EN020022

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DOCUMENT: 7.9.7

DATE: 3 NOVEMBER 2020

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DOCUMENT

Document	7.9.7 Applicant's Response to Deadline 1 Submission from persons who have not registered as Interested Parties
Revision	001
Document Owner	WSP UK Limited
Prepared By	Various
Date	3 November 2020
Approved By	U. Stevenson
Date	3 November 2020

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1. INTRODUCTION

1.1. PURPOSE OF THIS DOCUMENT

- 1.1.1.1. AQUIND Limited (the Applicant) submitted an application for the AQUIND Interconnector Order (the Order) pursuant to Section 37 of the Planning Act 2008 (as amended) (the PA2008) to the Secretary of State (SoS) on 14 November 2019 (the Application). The Application was accepted by the Planning Inspectorate (PINS) on 12 December 2019, with the Examination of the Application commencing on 08 September 2020
- 1.1.1.2. The Application seeks development consent for those elements of AQUIND Interconnector (the Project) located in the UK and the UK Marine Area (the Proposed Development).
- 1.1.1.3. Written Representations (WRs) from parties not registered as Interested Parties (IPs) were submitted to the Planning Inspectorate (the 'Inspectorate') up to and including 12 October 2020. The WRs were published on the Inspectorate's website on 16 October 2020 in five volumes.
- 1.1.1.4. On 15 October, the Examining Authority (ExA) issued a letter under Rule 17 of The Infrastructure Planning (Examination Procedure) Rules 2010 requesting that the Applicant provide a response to the relevant issues raised in those representations. In addition, a non-technical summary of matters of a technical nature was requested where necessary to explain any technical matters, as was a list of any themes that the Applicant does not consider to be relevant to the examination or determination of the Application.

1.2. STRUCTURE OF THE APPLICANT'S RESPONSES

- 1.2.1.1. Section 2 of this Report collates and address the themes raised in the WRs where they are relevant to the Examination.
- 1.2.1.2. Section 3 of this Report provides a summary of the themes raised that the Applicant does not consider to be relevant to the examination and determination of the Application, together with an explanation of why this is the case.
- 1.2.1.3. The Applicant was requested to provide a non-technical summary of matters raised in the WRs where necessary to explain technical matters. The Applicant has reviewed the WR and determined that all matters of a technical nature can be appropriately responses to in a non-technical manner, and therefore a non-technical summary is not separately included.

2. MATTERS RAISED IN WRITTEN REPRESENTATIONS RELEVANT TO THE EXAMINATION

Table 2.1 – Consultation and Communication

Ref.	Issue Raised	Applicant's Response
2.1.1	Patchy communication on the project with Portsmouth City Council (PCC).	The Applicant has been undertaking engagement with PCC since 2017. The Applicant has undertaken consultation with stakeholders and PCC in accordance with section 42, 47 and 48 of the Planning Act 2008 ('PA2008'). The Applicant has produced a comprehensive Consultation Report (APP-025) which details pre-application engagement with PCC and other stakeholders. Section 7 of the Consultation Report provides an overview of the initial engagement activities undertaken by the Applicant. This includes two meetings with PCC in April 2017 and September 2017. The Planning Inspectorate considered the consultation undertaken by the Applicant in the s55 checklist issued in October 2019 and were satisfied that it was adequate, hence the application being accepted for Examination on the 12 December 2019. The ExA has ruled on the relevance of the adequacy of the pre-application consultation to the Examination.
2.1.2	Lack of quality engagement with the public. Lack of public consultation.	<p>The Applicant has undertaken two extensive public consultations. The first, non-statutory consultation took place in January - February 2018. Following feedback received, the Applicant updated the proposal and has undertaken a second consultation statutory consultation with the local community in accordance with section 47 and 48 of the Planning Act 2008 in February – April 2019. The Planning Inspectorate was satisfied that the Applicant has complied with Chapter 2 of Part 5 (pre-application procedure) of the PA2008.</p> <p>The Applicant has produced a comprehensive Consultation Report (APP-025) which details pre-application engagement with local community and businesses. Section 7 provides an overview of the initial engagement activities, which includes meetings with PCC. Section 8 of the Consultation Report provides an overview of the non-statutory consultation undertaken by the Applicant.</p> <p>In January 2020, following the acceptance of the Application, a community update newsletter has been circulated to those registered to receive updates. The number of subscribers to the newsletter in January 2020 was 467 and it is now 479. The newsletter provided an update on the changes made to the proposals following the analysis of the feedback from the statutory consultation, as well as information on the examination process.</p> <p>In early 2018 the Applicant set up a freephone information helpline - 01962 893869, email address - aquindconsultation@becg.com and FREEPOST – AQUIND CONSULTATION, which can be used by anyone to contact the project team. All three methods of communication remain operational. This contact information has been included in all public communications and is easily accessible on the consultation website.</p>
2.1.3	Some parties registered for updates from Aquind, and asked to be invited to the consultations they had planned, but were never been invited to attend any meetings, and now it is understood some have taken place without their knowledge.	It appears that there is some confusion regarding the difference between the public consultation undertaken by AQUIND, and the Examination process that is the responsibility of the Inspectorate. All individuals who had registered for updates with AQUIND at the time of the statutory consultation in February to April 2019 received invitations to participate in the consultation, details of which can be found in Chapter 14.3 of the Consultation Report (APP-025). AQUIND has complied with its requirements to publicise the Section 56 process for registration of Interested Parties, including publication of newspaper notices, via the project website and

Ref.	Issue Raised	Applicant's Response
		within the Acceptance Update Newsletter issued in January 2018. However, it is not the responsibility of AQUIND to inform all parties registered of updates to the Examination timetable and forthcoming hearings. This is the responsibility of the ExA.
2.1.4	Residents and users of Langstone Harbour (such as dog walkers, runners, fisherman, and leisure boaters) have not been consulted nor questioned regarding whether they would welcome works.	<p>The Applicant has undertaken consultation with the local community in accordance with section 47 and 48 of the Planning Act 2008.</p> <p>Community stakeholders that use, live or are located around Langstone Harbour were consulted to provide opportunity for input. Amongst others, organisations such as Langstone Harbour, Langstone Harbour Fishermen's Association, Tudor Sailing Club, Langstone Sailing Club, Southsea Angling Club, Southsea Marina, Lock Sailing Club, Hayling Island Sailing Club, Portsmouth Lifeboat Station, Portsmouth University and Kendall's Wharf Aggregates were consulted, as were many residents that live in proximity to Langstone Harbour and included within the Primary Consultation Zone (agreed with Local Authorities). Such persons would have received multiple communications regarding the Proposed Development through letters and newsletters during 2019 (and as part of the informal early consultation process during 2018) making them aware of the consultation process, the project status and project website with contact details. The Royal Yachting Association and Cruising Association were consulted, and multiple meetings were held with local commercial fishermen and with recreational angling stakeholders. In addition, two rounds of public exhibitions were publicised widely through the local newspapers and posters, as was the consultation carried out pursuant to section 42 of the Planning Act 2008 which also captured residents and users of Langstone Harbour requesting their input.</p> <p>Further details can be found within the Consultation Report (APP- 025) and the Statement of Community Consultation (APP-076).</p>
2.1.5	Request to organise public meetings later in the year as part of the process and to consider ensuring that these are held in the area around Lovedean, Hambledon, and Denmead so that they are easily accessible to residents who wish to attend.	During the Examination process, the Inspectorate holds hearings on a range of topics, and these are open to the public to attend. Any requests to attend the hearings are matters for the ExA. It is acknowledged that the holding of public meetings is unfortunately curtailed by the current COVID-19 pandemic, but that appropriate virtual measures have been put in place by the ExA. .
2.1.6	Request more generally that liaison and consultation with PCC and residents is vitally important, so that things can be planned to minimise impact. There should be a formal arrangement for this so that contractors have to liaise about restrictions and arrangements can be agreed well before any changes can be imposed. Aquind should provide a liaison officer and also pay for a corresponding officer employed by the PCC to look after the residents and the city's interests.	The Applicant refers to Appendix 1 of the updated Framework Traffic Management Strategy (FTMS) (REP1-068), which contains the Onshore Cable Route Construction Impacts on Access to Properties and Car Parking and Communication Strategy. This provides further detail on the expected impacts on residential, business and public vehicle parking along the Onshore Cable Corridor during construction. It outlines the Applicant's proposed approach to communicating with local residents, businesses and other stakeholders during the construction period for the onshore elements of the Proposed Development, including high-level objectives, working plans and evaluation methods, and seeks to build upon existing relationships and communication methods with these groups. The mitigation outlined in this report is secured in the Construction Environment Management Plan ('CEMP') specific to each phase of development.

Table 2.2 – Alternatives

Ref.	Issue Raised	Applicant's Response
2.2.1	Cable route cannot go through the second most densely populated city in the UK.	The Applicant disagrees with this comment and refers to the Application documents (November 2019) and subsequent submissions made at Deadline 1 and 2 which clearly evidences the need for and feasibility of the Proposed Development.

Ref.	Issue Raised	Applicant's Response
2.2.2	<p>Landing at Portsmouth increases the distance the cable must travel. Assumption that Aquind have chosen this route to exploit the public ownership of land and the infrastructure of the city.</p>	<p>The selection process was based on a number of factors as follows:</p> <ol style="list-style-type: none"> 1. Grid-connection location 2. A variety of factors informed the selection of the cable route including: <ul style="list-style-type: none"> • Distance • Technical viability / constructability • Environmental impact • Delivery programme (time) • Cost <p>Further detail on this is available in Chapter 2: Consideration of Alternatives of the ES (APP-117), Appendix 2.4: Summary of Onshore Cable Route Alternatives of the ES (APP-353) and the Supplementary Alternatives Chapter of the ES Addendum (REP1-152).</p> <p>These documents demonstrate that the proposed grid connection location and route were:</p> <ul style="list-style-type: none"> • Technically and commercially viable (not all were) • Involved the shortest cable route (of viable options); and • Least environmental impact <p>The Applicant has not sought to exploit the public ownership of land and the infrastructure of the city. The Applicant has however sought to minimise the need for compulsory acquisition of land (both private and public) wherever possible.</p>
2.2.3	<p>Insufficient attention of Aquind to other alternative locations for the proposed works which may have a reduced impact on communities and the environment.</p> <p>Refusal of Aquind to consider alternative routes.</p> <p>There are other route options that have less impact even though they might affect profit.</p>	<p>The Applicant refers to Chapter 2: Consideration of Alternatives of the ES (APP-117) and the Supplementary Alternatives Chapter (REP1-152) which describes the alternative locations considered and discounted.</p> <p>Since the inception of the Proposed Development, the Applicant has undertaken numerous studies, environmental assessments and engineering appraisals to determine the most suitable location for the Proposed Development, including the converter station, the landfall and the onshore cable route.</p> <p>The Supplementary Alternatives Chapter has been produced to provide further clarity in respect of the description of the reasonable alternatives and the main reasons for the option chosen. The document sets out all of the reasonable alternatives options considered for the Proposed Development. The Applicant has considered and balanced the relevant considerations in relation to the alternatives studied, guided by the relevant policy requirements provided for by the National Policy Statement and has reached reasonable and logical conclusions. It is the view of the Applicant that when balancing all relevant considerations in relation to the reasonable alternatives, it has selected an optimal final option for the Proposed Development.</p>
2.2.4	<p>No reasoning given why other route options have been ruled out, i.e. further into Langstone Harbour or Chichester Harbour (or the less density populated Hayling Island, or Thorney Island). Because this route it the cheapest despite having the most impact? Humans are more important than seaweed and the fish.</p>	<p>The Applicant refers to Chapter 2 of the ES (Consideration of Alternatives) (APP-117) and the Supplementary Alternatives Chapter (REP1-152) which outline the alternatives considered.</p> <p>The Supplementary Alternatives Chapter has been produced to provide further clarity in respect of the description of the reasonable alternatives and the main reasons for the option chosen. The document sets out all of the options considered for the Proposed Development. Section 6 of the Supplementary Alternatives Chapter provides further information on the Applicant's assessment of utilising Langstone Harbour and Hayling Island.</p> <p>The use of Thorney Island for landfall is not considered to be a viable alternative due to adverse effects on environmental designations, as explained in section 2.6.6.26 of ES Chapter 2 (Consideration of Alternatives) (APP-117).</p>

Ref.	Issue Raised	Applicant's Response
2.2.5	There must be a location in Kent, East Sussex or West Sussex which is more suitable.	<p>The Applicant refers to Chapter 2 of the ES (Consideration of Alternatives) (APP-117) and the Supplementary Alternatives Chapter (REP1-152) on reasonable alternatives considered. For all of the reasons set out in section 5 of the Supplementary Alternatives Chapter, the Applicant determined that Lovedean was the preferred reasonable alternative for the grid connection point and proceeded with NGET in relation to the connection offer for a connection at Lovedean substation, whilst continuing the development and refinement of the wider proposals for the Proposed Development.</p> <p>In terms of the landfall selection process, the initial search area extended across the South Coast of England, bounded by West Bay, Dorset in the southwest and Bognor Regis, West Sussex in the southeast. 29 potential landfall sites were initially considered and, following an initial ranking exercise and the confirmation of Lovedean substation as the grid connection point, nine sites were evaluated in further detail. Eastney was ultimately chosen as the most feasible and least harmful location.</p>
2.2.6	<p>A number of alternatives routes have been proposed. For example, the route could continue underwater up Langstone Harbour, landing at Bedhampton or Farlington.</p> <p>There is also a ready made route from Portsdown hill to Gosport. This is a redundant MOD pipeline with two about 14 inch pipes that run from the oil fuel bunkers buried in the hill just to the west of Fort Southwick, then to Portchester Crematorium, next to MOD Bednam and finally to the MOD Oil fuel depot at Forton Road Gosport. The route is described on the web site "Portsdown Tunnels".</p>	<p>The Supplementary Alternatives Chapter (REP1-152) has been produced to provide further clarity in respect of the description of the reasonable alternatives and the main reasons for the option chosen. The document sets out all of the options considered for the Proposed Development.</p> <p>For example, Section 6 of the Supplementary Alternatives Chapter provides further information on the Applicant's assessment of utilising Langstone Harbour, including options for a submarine cable to be located within the harbour. It was determined that this option was not feasible and would have prevented the development from coming forward, carried too high a level of risk in various respects, and was considered likely to result in adverse impacts to the surrounding sensitive and heavily designated environment.</p> <p>The Portsdown Tunnel has not been considered because its landfall location, Gosport, was not shortlisted as a viable landfall. A landfall at this location was not considered, for reasons similarly reported for locations that were considered further up the Solent than Eastney and as described in the Alternatives (APP-353) and the Supplementary Alternatives Chapter of the ES Addendum (REP1-152). These reasons were issues relating to cable-lay in proximity to the existing IFA2 cable and the busy shipping lanes, numerous cable crossings in the Solent and in the entrance to Portsmouth Harbour and constraints on crossing design imposed by the requirement to not reduce navigable depth by more than 5%. Construction activity for a landfall would need to take place in the entrance fairway to this busy commercial and naval port, which would have been disruptive to vessel movements.</p> <p>This is not a reasonable alternative that should be considered to be important or relevant to the decision on the Application taking into account the reasons why this would not be feasible.</p>
2.2.7	The cheapest route would be straight up Portsmouth Harbour making land fall at the mainland at the junction of Southampton road and entry junction to Port Solent without touching Portsea Island at all. There is a green strip that runs adjacent to the M27 and up to Portsdown Hill and past Portsdown Hill there is farmland right through to Clanfield, routing this way minimises any disruption to traffic or infrastructure.	<p>A route through Portsmouth Harbour was considered to be not a feasible alternative in the optioneering process. The harbour has similar technical constraints to Chichester and Langstone Harbours and is therefore not feasible. For example, it is too shallow and narrow in places for the cable laying barge to navigate. It is also an active military and civil port and the installation of the cable would have resulted in a blockage to the port entrance, and anchors would be likely to damage the cable. It is also a Special Protection Area (SPA), forming one of the most important sheltered intertidal areas on the south coast of England.</p> <p>Any route through Portsmouth Harbour is also likely to have to cross the existing IFA2 submarine cable. As explained in Sections 5.2.5 and 5.2.6 of the Supplementary Alternatives Chapter (REP1-152) there would be issues relating to proximity to the cable, acceptable water depth for a cable crossing and construction in a busy shipping lane.</p>
2.2.8	What alternative and more rural routes have been considered? If none, why not?	The alternative cable route options were presented in section 2.4.11 of Chapter 2 of the ES (Consideration of Alternatives) (APP-117). In addition, further information is provided in section 7 of the Supplementary Alternatives Chapter (REP1-152) with respect to the two shortlisted options.

Ref.	Issue Raised	Applicant's Response
		The Applicant also explained its consideration if two alternative Countryside routes. Section 8 of the Supplementary Alternatives Chapter (APP-117) explains why the Applicant concluded that it was not appropriate to pursue the alternative Countryside Route.
2.2.9	<p>HVAC lines running above ground in the vicinity of the proposed routes.</p> <p>Surely there is the technology available to co-route the cables through the existing corridor already? This would significantly reduce the impact to the surrounding area and the people involved, after all, the HVAC pylons run directly from the Lovedean substation through to Portsmouth and there are existing wayleaves and/or covenants on the land that would allow for this?</p>	<p>The technical requirements for an overhead route are significantly different to an underground route with regard to terrain, contours, obstacles and ground conditions.</p> <p>The installation of HVDC cable circuits within the corridor/wayleave of an existing overhead line (OHL) would not be possible due to the physical interference of the foundations of the OHL towers preventing the installation of the cable circuits.</p> <p>There are significant technical, health and safety issues associated with the construction, operation and maintenance of a cable system installed in parallel and close to an HVAC overhead line concerned with impressed voltages and live conductors.</p> <p>Finally, the existing assets are within wayleaves designed to allow the owner rights of access for any works required during the lifetime of the system, including updating, modifications, repairs etc. Installation of the onshore cable within the wayleave would restrict the ability to maintain or otherwise work on the OHL.</p> <p>For these reasons it is not feasible to install an HV cable system along the route of an HV overhead line.</p> <p>This is not a reasonable alternative that should be considered to be important or relevant to the decision on the Application taking into account the reasons why this would not be feasible.</p>

Table 2.3 – Allotments

Ref.	Issue Raised	Applicant's Response
2.3.1	<p>Concern about going under (removal) the Milton allotments, and also a large area of allotments to be cleared to give an access site. Access can be gained by using the roads and paths</p> <p>on the allotments but should not be allowed to destroy allotments and it cannot encroach onto any of the plots.</p> <p>In addition, the car park, onsite shop and toilets, Community Plot and possibly parts of Eastney Lake could also be impacted.</p> <p>Allotment holders grow fresh fruit and veg which they often donate to the community.</p> <p>Moorings Way Infant School use this area for outdoor learning.</p> <p>Structures that it will impact by being bulldozed</p>	<p>The Applicant confirmed in the response to Relevant Representations (REP1-160) that at Milton Allotments, the cable is to be installed by Horizontal Directional Drilling (HDD), with no effect on the surface of the land during construction (Table 2.6, response to Portsmouth City Council under Socio-economic theme). This construction methodology is specifically proposed in this location to avoid affecting the continued use of the allotments.</p> <p>The Applicant's Response to Written Representations (REP2-014, Portsmouth City Council, point 3.18) confirms that Plot 10-13 (Book of Reference, REP1-027) has been corrected to relate to the access roads only, with only rights of access sought over these in connection with inspections during the construction and maintenance of the Proposed Development.</p> <p>Other aspects of the allotments listed will not be affected.</p>

Ref.	Issue Raised	Applicant's Response
2.3.2	Any future need for maintenance would involve accessing the cable from the surface that will lead to clearance of the plots, which is not acceptable.	Future maintenance of the cable beneath the allotments will be undertaken from joint bays located outside of the allotment's plots. Therefore, no allotment plots will be affected by future maintenance of the cable.
2.3.3	<p>Concern about loss of Green Spaces, especially during a pandemic (and possibly future spikes/pandemics). It is also against the Local Plan for the authority where green areas are protected.</p> <p>Mentioned areas: Milton Piece allotments, Milton Common, Milton Locks, Bransbury Park, Langstone Harbour, Eastney Beach and Farlington Marshes.</p>	<p>Chapter 25 (Socio-economics) of the ES (APP-140) assesses the impact upon recreational space, including green spaces. Table 25.14 summarises the worst-case anticipated effects on open spaces including parks and playing fields including those mentioned, some of which are significant during construction due to the duration of the impact. However, all impacts are temporary.</p> <p>Chapter 26 (Human Health) of the ES (APP-141) assesses the impact upon human health. Temporary minor adverse impacts on human health have been identified during the Construction Stage due to the temporary use of green space, including playing fields. The assessment undertaken concludes that the overall effect on human health due to these temporary changes is not significant.</p> <p>There will not be any permanent loss of recreational and open space areas (para 25.7.3.5 in Chapter 25 of the ES (APP-140)). With regard to compliance with Local Plan policies, the Planning Statement (APP-108) at paragraph 5.3.11 considers local planning policies in relation to the land use including open space, green infrastructure and Green Belt. It confirms that as all impacts will be temporary, the Proposed Development complies with those policies. Mitigation measures identified which are also included in the Outline Onshore Construction Environmental Management Plan (OOCEMP) (REP1-087) include consultation with affected groups, and a review of programme and construction area requirements has been undertaken to reduce effects on open space (see Section 25.9.5 of Chapter 25 (Socio-economics) (APP-140)).</p> <p>The Applicant is continuing to seek engagement with Portsmouth City Council in relation to measures to mitigate the temporary impacts on green spaces in Portsmouth.</p>
2.3.4	The plots are supposed to be protected again under the Allotments Act 1950.	<p>The relevant considerations in relation to special category land and section 132 of the PA 2008 (which applies to allotments) are contained at paragraph 8.1 of the Statement of Reasons (REP1-025). Paragraph 8.1.4 confirms there will be no physical infrastructure on the surface of special category land which the compulsory acquisition of rights is proposed to be authorised, and the acquisition of those rights over land will not affect the character of that land following the construction of the Proposed Development, since the surface of the land will not be affected by the development, as the cable installation in the vicinity of the allotments is being done via HDD which means no surface works and therefore no restoration is required. The rights sought over land in the allotment now only relates to the access paths in the allotments as defined in the updated Order Limits (REP1-133). This is for checking and monitoring during the HDD process and for scheduled and unscheduled monitoring and maintenance during the operational phase of the development comprising a site walk over using the allotment paths to check for any activities which may affect the cables, as discussed with PCC on the 29/10/2020.</p>
2.3.5	According to the terms of the Rights of Access and of Works proposed in the Book of Reference dated November 2019: With no qualifications, these Rights permit	Requirement 6 (3) at Schedule 2 of the dDCO (REP1-021) requires design approval to be obtained for Work No.4 before the works may commence, which includes the Horizontal Directional Drilling (HDD) under the allotments. This requires written details of the layout, cable burial depths and location of the joint bays, link boxes and link pillars to be confirmed. This information is for approval by relevant planning authority, and as a consequence of the information required to be approved pursuant to Requirement 15 (CEMP) must include the HDD entry/exit locations in relation to the works at Milton and Eastney Allotments.

Ref.	Issue Raised	Applicant's Response
	<p>- damage to allotments (see 10.13 and 10.14), both during the works and continually thereafter. This damage is listed in Table 1.1.</p> <p>- damage and inconvenience to the car parking, paths, adjacent building, allotments, trees, shrubs and sheds (see 10.13 and 10.14). See Table 1.1.</p> <p>It is unreasonable to grant such unqualified rights.</p>	<p>It would be unlawful in accordance with Article 3 to the dDCO to not comply with Requirements 15 to the dDCO by undertaking works in the locations identified for HDD by any method other than HDD. Further, no approval would be given for such works pursuant to Requirement 6(3), as they would not accord with the authorised development.</p> <p>Therefore, damage to the allotments will not result from the HDD which is appropriately controlled within the dDCO when the relevant documents are read as a whole.</p> <p>The Applicant intends to update the Works Plans to make the position clearer and to avoid any future confusion.</p>
2.3.6	Request to compensate expensive "good soil", its placement and plants at allotment of Gordon Lowe.	No allotment plots will be affected by the construction or operation of the Proposed Development. Therefore, compensation will not be required.
2.3.7	Before the works please can the Applicant state how much notice allotment holders will get of the intended plans for their specific allotment and 2. will the access roads be maintained in a usable state?	<p>No allotment plots or the access road will be affected by the construction or operation of the Proposed Development (with the access road to be used by persons on foot only).</p> <p>At this time, the Applicant is not aware, following the making of its diligent inquiries, that the allotment holders do have an interest over the subsoil below the anticipated minimum depth of the HDD (2.5 metres) or over the existing paths. Unless this is the case then the Applicant is not required to give notice of the works.</p> <p>However, the Applicant is aware that the ExA has requested Portsmouth City Council to confirm whether there is a vertical, depth restriction to each parcel of allotment land and the associated rights and whether persons have a relevant interest over the existing paths. Should the response to this request for further information confirm, with sufficient evidence, that the allotment holders do have an interest over the subsoil below this anticipated minimum depth and/or over the existing paths within Plot 10-14, the Applicant will seek to include those persons in the Book of Reference. The Applicant would then be required to give not less than 10 days' notice prior to works commencing.</p>
2.3.8	<p>Concerns were raised that as well as the bore holes' slurry will be piped in to look for leaks. What is the content of slurry?</p> <p>And is the slurry that you hope pops up showing leaks going to extensively or on any level render the allotment unusable?</p>	<p>Slurry will not be piped into the boreholes for leak detection purposes.</p> <p>Bentonite is an inert clay which is used as a drilling lubricant and to maintain the integrity of the HDD bore. It helps to loosen the material through which the HDD bore is driven, discharges spoil, stabilises the bored tunnel and also cools the cutting tools.</p> <p>In the unlikely event that Bentonite were to break out to the surface it would have no effect on the usability of the allotments, and is in fact a fertilizer. There will be procedures in place to clean up breakouts manually as necessary.</p> <p>For more information on drilling fluid specifications please see Section 2.2 of 7.7.3 – HDD Position Statement Note (REP1-132).</p>
2.3.9	Is the proposed destruction of people's allotments due to cables going under them or because a giant storage area is needed for the equipment the company will need? I presume that this will be large plant that will have difficulty accessing the site entrance between the houses there. Does that	No allotment plots will be affected by the construction or operation of the Proposed Development. No compulsory acquisition of dwellings is proposed. This comment is completely without any foundation.

Ref.	Issue Raised	Applicant's Response
	mean the misery for those people of having their houses compulsory purchased and demolished?	
2.3.10	We are having a new shed put on our plot, which is a necessity as the existing shed is beyond repair, and hence are having to pay a company to remove the old shed and erect the new shed. This is costing us in the region of £500. I hope that Aquind would compensate any plot holders if they need to gain access.	No allotment plots will be affected by the construction or operation of the Proposed Development.
2.3.11	<p>Are these plots really going to be dug up and destroyed? What about the chaos this work will cause to the traffic in and out of an already busy city?</p> <p>What about the residents who will be affected driving in and out of an already overpopulated area. Will their homes be affected?</p> <p>Will the pollution levels rise as a result of this work?</p>	<p>No allotment plots will be affected by the construction or operation of the Proposed Development.</p> <p>Concentrations of air pollutants in the area around Milton Allotments are predicted to deteriorate during construction by around 0.1 µg/m³ on an annual average basis which is considered to be negligible and imperceptible. These changes are described in Chapter 23 Air Quality Assessment (REP1-033) and shown in Figure 23.15 (REP1052) and Figure 23.16 (REP1-053).</p> <p>The construction of the Onshore Cable Route and the management measures to mitigate the impacts of doing so have been carefully considered and the changes to the operation of the highway network are temporary with the highway network returning to normal levels of operation following the completion of the works. Impacts of this construction work are to be mitigated through measures set out within the Framework Construction Traffic Management Plan (REP1-070) and the Framework Traffic Management Strategy (REP1-068) (which were both updated and submitted at Deadline 1 and are secured by Requirement 17 and the protective provisions for the protection of highways and traffic at Part 5 of Schedule 13 to the dDCO, respectively (REP1-021)).</p> <p>The strategy for maintaining access to properties during the construction period is provided within Section 4 of the Onshore Cable Route Construction Impacts on Access to Properties and Car Parking and Communication Strategy, included at Appendix 1 of the updated FTMS (REP1-068).</p> <p>Where single lane closures are required during construction of the Onshore Cable Route vehicle access will be unavailable during construction working hours, except for emergencies and for vulnerable persons. Outside of construction working hours, access to properties and driveways will be provided through road plates which will be used to bridge the trench.</p> <p>Where full road closures are required vehicle access will be unavailable for the entirety of the road closure, including outside of construction working hours, except in emergencies and for vulnerable persons. The requirement for full road closures is very limited, and involves the closure of very short sections of the highway where construction cannot be completed safely whilst maintaining adequate space for traffic to pass by the works.</p> <p>Pedestrian and bicycle access to residential properties will be maintained at all times, as will access for those using wheelchairs, mobility scooters and pushchairs</p>
2.3.12	Are there any plans to carry out an environmental impact assessment on the site? (Eastney and Milton Allotments)	A full environmental impact assessment, in relation to the Proposed Development, has been undertaken. The Applicant refers to the Environmental Statement documentation submitted with the Application, see documents APP-116 to APP-145, as well as the Environmental Statement Addendum (REP1-139) for the environmental impact assessment. Eastney and Milton Allotments are

Ref.	Issue Raised	Applicant's Response
		<p>located within Section 9 of the , as shown in Figure 3.9 (Order Limits Sections (Onshore)) of the ES (APP-154). ssessments of this are located in the following documents:</p> <ul style="list-style-type: none"> • Landscape and (APP-130) – section 15.8.14 • Visual Amenitylocationthe Proposed Development in AOrder LimitsOnshore Ecology (APP-131) – section 16.6.2 • Soils and Agricultural Land Use (APP-132) – section 17.6.5 • Ground Conditions (APP-133) – sections 18.7.3.16 and 18.7.4.13 • Groundwater (APP-134) – sections 19.6.6.17, 19.6.6.18 and 19.6.7.8 • Surface Water Resources and Flood Risk (APP-135) – section 20.7 • Heritage and Archaeology (APP-136) – sections 21.6.2.36 to 21.6.2.38 and 21.6.3.5 • Traffic and Transport (APP-137) – sections 22.6.13.8 and 22.6.13.9 • Air Quality (REP1-033) – sections 23.6.2.40 to 23.6.2.43 • Noise and Vibration (APP-139) – section 24.6.10 • Socio-economics (APP-140) – Table 25.14 • Human Health (APP-141) – 26.6.1.2 and 26.6.3.33

Table 2.4 – Travel Disruption and Congestion

Ref.	Issue Raised	Applicant's Response
2.4.1	Massive disruption and congestion upon Portsmouth's road network, including the junction of the M27, A27 and A3.	<p>The Transport Assessment (Appendix 22.1 of the ES) (APP-448) assessed the impacts of the Proposed Development on the transport network. The effects of the Onshore Cable Corridor temporary works have been carefully considered and the changes to the operation of the highway network (both positive and negative) are temporary with the highway network returning to normal levels of operation following the completion of the works.</p> <p>A Supplementary Transport Assessment has been completed (and submitted at Deadline 1 as Appendix 11 to the ES Addendum (REP1-142)) in response to Relevant Representations and further discussions with PCC and HCC following the submission of the Application in November 2019. The assessments completed within the Supplementary Transport Assessment do not alter the findings of the original Transport Assessment (APP-448).</p>
2.4.2	<p>Maximum disruption on one of the three main artery roads in Portsmouth - Eastern Road (A2030). These works would dramatically reduce the access to the city for a considerable period of time, causing huge delays backing up onto the M27 and A3.</p> <p>This is also the main route leading to the city football stadium.</p>	<p>The Applicant concludes in both assessments that there will be localised areas on the highway network that experience an increase in traffic levels and associated congestion as a result of the construction of the Proposed Development. However, any impacts are temporary in nature and will be mitigated through measures set out within the FTMS (REP1-068) and Framework Construction Traffic Management Plan (REP1-070) (which were both updated and submitted at Deadline 1 and are secured by Requirements 19 and 17 respectively of the dDCO (REP1-021)). These assessments have not predicted adverse traffic impacts extending back to the M27 and A3 as result of construction of the Onshore Cable Route.</p>
2.4.3	Portsmouth Football Club is at the end of the A2030 and on match days the traffic is very heavy, often backing up on the A27/M27 controlled by Highways England.	<p>The FTMS (REP1-068) provides mitigation of traffic impacts through the provision of restrictions in relation to the number of works that can be ongoing on the highway at any one time (6), the proximity of those works in relation to one another so as to avoid cumulative impacts of multiple works being undertaken, and programme restrictions that limit construction as far as practically possible to school holidays and periods outside of the football season in relevant sensitive locations. As shown in Section 10 of the updated FTMS, construction along the A2030 Eastern Road is permitted only during the following periods:</p>

		<ul style="list-style-type: none"> • Easter school holidays; • May half-term (outside of football season); • June; • July; and • August (avoiding Victorious Festival weekend). <p>With these restrictions, construction will take place during the football season only during the Easter school holidays and in August, which may correspond with 2-3 Portsmouth FC home matches during construction of each circuit, so would only affect a maximum number of between four and six matches. As set out in the FTMS, construction will also avoid the weekend in which Victorious Festival takes places (August bank holiday) and Great South Run (October).</p>
2.4.4	Assessment of a route which does not involve the use of the A3 road ought to be considered.	<p>In addition to ES Chapter 2 (Consideration of Alternatives) (APP-117), the Applicant has produced a Supplementary Alternatives Chapter submitted as part of the Environmental Statement Addendum (REP1-152) at Deadline 1 which provides further clarity on the alternatives considered by the Applicant and the main reasons for the option chosen.</p> <p>The alternative options for the Proposed Development, have been thoroughly assessed with the relevant considerations in relation to the alternatives studied, taken into consideration and balanced, guided by the relevant policy requirements and guidance in relation to the compulsory acquisition of land. Whilst there is no requirement for an applicant to demonstrate that a proposed project represents the best option from the alternatives which were studied, it is the view of the Applicant that when balancing relevant considerations in relation to the reasonable alternatives, it has selected an optimal final option for the Proposed Development.</p>
2.4.5	If the cable needs repeated maintenance on A3 road after construction that this could cause problems on several heavily-used roads.	<p>Once the Proposed Development is constructed and noting the minimal maintenance requirements associated with infrastructure of the type of the Proposed Development, there will be negligible effects on any highways within Portsmouth during operation. Cable repairs will be undertaken from join-bays where cable sections are linked, thus avoiding need to excavate the cable route. No joint-bays will be located within the A3 carriageway.</p> <p>Such maintenance requirements are set-out in in Section 3.4.6 of Chapter 3 of the ES (APP-118).</p>
2.4.6	Serious concern about the proposed route through Farlington at the top of Portsmouth and through the key-route networks of Farlington Avenue and London Road through Widley and into Waterlooille (because of congestion and air quality issues).	<p>The Transport Assessment (Appendix 22.1 of the ES) (APP-448) assessed the impacts of the Proposed Development on the transport network. The effects of the Onshore Cable Corridor temporary works have been carefully considered and the changes to the operation of the highway network (both positive and negative) are temporary, with the highway network returning to normal levels of operation following the completion of the works.</p> <p>A Supplementary Transport Assessment has been completed (and submitted at Deadline 1 as Appendix 11 to the ES Addendum (REP1-142)) in response to Relevant Representations and further discussions with PCC and HCC following the submission of the Application in November 2019.</p>
2.4.7	Concern about Solent Infant School part of the route. Schools are congested areas, and with large sections of the road dug-up, in particular Farlington Avenue. This road is a key route, when there is an accident on the M27/A27, so Aquind works cannot be carried out here without maximum disruption.	<p>The assessments completed within the Supplementary Transport Assessment do not alter the findings of the original Transport Assessment. It is concluded in both Assessments that there will be localised areas on the highway network that experience an increase in traffic levels and associated congestion as a result of the construction of the Proposed Development, however, any impacts are temporary in nature and will be mitigated through measures set out within the Framework Traffic Management Strategy (REP1-068) and Framework Construction Traffic Management Plan (REP1-070) (which were both updated and submitted at Deadline 1 and are secured by dDCO Requirements 19 and 17 respectively).</p>

	<p>Affected schools: Wind in the Willows Nursery, Mary Rose Special Academy, Milton Park Primary School, Moorings way Infant school, Solent Infant and Junior schools</p>	<p>Section 7 of the FTMS (REP1-068) includes programme restrictions that prohibit construction work taking place on Farlington Avenue and Eveleigh Road within proximity of Solent Infant School and Solent Junior School within term time. As is set out in Table 18 and Table 19 of the FTMS, works will only be permitted on Farlington Avenue south of Sea View Road or Eveleigh Road during the February, May and October half-terms, the Easter school holidays, and the summer school holidays. This mitigation measure prevents the cable duct installation from impacting school traffic in this location.</p> <p>The dDCO (REP1-021) contains protective provisions for the protection of the highways and traffic (Part 5 of Schedule 13) to mitigate the impact of construction where there are accidents or other unforeseen circumstances. Paragraph 10 of the protective provisions (for the protection of the highway) provides the ability for the highway authority to provide directions in relation to the works:</p> <ul style="list-style-type: none"> • Where an emergency occurs or where necessary to secure the safety of the public; • Where works are being carried out in any manner which constitutes or is likely to constitute a danger to any person or class of persons or to affect the stability or integrity of any structures or apparatus including the public highway; and • Where, as a consequence of unforeseen circumstances, in the reasonable opinion of the relevant highway authority any part of the works being carried out or to be carried out within the public highway are causing or are likely to cause serious disruption to traffic that will endanger the safety of the public. <p>Paragraph 4(2) of the protective provisions for the protection of the highway provides for any detailed traffic management strategy to be revised where necessary in the event of unforeseen circumstances.</p> <p>Section 2.13 of the FTMS (REP1-068) also includes proposals for further mitigation around schools, such as provision of traffic marshalling around schools impacted by the construction works. The Applicant is currently in discussions with PCC regarding the implementation of such traffic management measures across the wider highway network.</p>
<p>2.4.8</p>	<p>Impact on The Orchards Hospital for people with mental illnesses.</p>	<p>Locksway Road is assessed within Chapter 22 of ES (Traffic and Transport) (APP-137) as a medium sensitivity link on the basis that it is a residential street and that The Orchards Inpatient Unit is set-back some distance from the carriageway down private access roads. The assessments of construction impact within Chapter 22 conclude that these will not generate significant effects on Locksway Road.</p> <p>During the construction stage all construction traffic will be managed by controls included within the Framework Construction Traffic Management Strategy (FCTMP) (REP1-070). This includes provision of a road safety liaison officer who will be responsible for the continual monitoring and provision of additional mitigation of construction traffic if necessary.</p> <p>The Orchards Hospital is located outside of the Study Area for the construction noise and vibration assessment of the Onshore Cable Corridor. Due to the distance between the Hospital and the Order Limits (over 200m). The noise and vibration effects at the Hospital during construction activities will be negligible.</p> <p>Concentrations of NO₂ at the location of the Orchards AMH Unit within the St. James Hospital grounds are predicted to be impacted by a deterioration in pollutant concentrations due to temporary drilling equipment. These changes are predicted to be less than 0.1µg/m³ and so are considered to be Negligible and imperceptible. The Orchards is within 350 m of Cable Section 9 (Chapter 23 Figure 23.2 sheet 9 of the ES REP1-033)., which has been assessed as providing a medium risk of dust impacts. At this distance, and with the secured mitigation in place, the effects of dust are also expected to be negligible and imperceptible.</p>

		The acute mental health wards at the Orchards Hospital are over 200 m from the closest Order limit boundary and a similar distance from the closest road transport route. Potential disruption to patients and their mental health arising from potential impacts arising from traffic and construction are predicted to be negligible.
2.4.9	Concern about works along Furze Lane, Moorings Way.	<p>The Order limits have been updated to remove Furze Lane and the bus link, meaning that the Onshore Cable Route will use the sports pitches on the Eastern side of the University Campus. As a result, access to the Langstone Sports Centre via Furze Lane will not be impacted by construction of the Onshore Cable Route. This update is reflected in the FTMS (REP1-068).</p> <p>. Moorings Way will be used if the final alignment of the Onshore Cable Route uses Eastern Avenue or the southern edge of Milton Common. If Moorings Way is used, construction will be facilitated through the implementation of shuttle working traffic signals for approximately 8 weeks per circuit. Programme restrictions contained within the FTMS will prohibit works being undertaken Eastern Avenue and Goodwit Road outside of the school holidays to mitigate the impact of construction on Moorings Way Infant School.</p> <p>Assessments of the shuttle working traffic signals to be used on Farlington Avenue and Moorings Way contained within the Supplementary Transport Assessment has predicted traffic delays of 30-45 seconds per vehicle during the AM and PM peak hours. The Applicant therefore considers this to be a minor delay to existing traffic conditions on these links..</p>
2.4.10	The plan may require the closure of a bus lane at Furze Lane or the University playing fields. This will mean either the only bus route covering 3000-4000 people – mainly pensioners - will be forced to close or it will directly affect people in Dunlin or Whimbrel Closes, who live at the end of the playing fields. Aquind has ignored requests to put this through the vacant University campus for plans that will significantly affect the amenity.	<p>The Order limits have been updated to remove Furze Lane and the bus link, meaning that the Onshore Cable Route will use the sports pitches on the Eastern side of the University Campus. As a result, Furze Lane will not be impacted by construction of the Onshore Cable Route. This update is reflected in the FTMS (REP1-068).</p> <p>The Applicant has been in contact with both Stagecoach and First Bus to discuss the Proposed Development. While it is agreed that some partial road closures maybe required, both bus companies have confirmed that appropriate mitigation can be put in place during the construction phase. Discussions between the Applicant and bus companies with regard to the Proposed Development are ongoing.</p>
2.4.11	Could the opportunity be taken to include a cycle path on the route, which might be a useful alternative to the Eastern Rd route which in places can be congested with both cycles and pedestrians sharing?	A cycle path is not required to mitigate the impacts of the Proposed Development and therefore it is not appropriate to include it within the Proposed Development.
2.4.12	Works alongside the Eastern Road. At present the coastal defence scheme phase 4 is working on the section from Kendall's wharf down to Milton Common. How are Aquind planning to work with this – the work is scheduled to continue for 3 years: could Aquind not minimise the disruption by working together with the coastal defence scheme.	The Applicant's Response to Relevant Representations (REP13.3, Table 2.1) advises that the North Portsea Island Coastal Defence Scheme is being developed by East Solent Coastal Partnership (ESCP) (now Coastal Partners) and was included in the cumulative assessment as project ID 62 in ES Chapter 29 (Cumulative Effects (APP-144)). The Applicant continues to engage with Coastal Partners and both parties have agreed to continue this engagement during detailed design and construction to mitigate impacts.
2.4.13	The route along Fort Cumberland Road and Ferry road – will affect the Langstone Lifeboat's	Construction of the Onshore Cable Route along Fort Cumberland Road will be facilitated by shuttle working traffic signals and will take approximately 7 weeks per circuit to complete. As stated in paragraph 12.2.1.5 of the FTMS (REP1-068), vehicular access to

	<p>capabilities and seriously affect the safety of Portsea seafarers.</p> <p>Will cause massive disruption to the only bus route that connects to that part of the city and the Hayling Ferry and National Cycle Route 2.</p>	<p>Eastney Lifeboat Station will be maintained throughout the duration of construction. The Applicant therefore strongly disagrees that the proposals will affect the safety of Portsea seafarers.</p> <p>Assessments of the shuttle working traffic signals to be used on Henderson Road contained within the Supplementary Transport Assessment (REP1-142) has predicted traffic delays of 20-45 seconds per vehicle during the AM and PM peak hours. This is considered to be a minor delay to First Group bus service 25 which runs to on this route.</p> <p>The Applicant is in discussions with First Group regarding the proposals, however they have not expressed any concern in relation to construction of the Onshore Cable Route and associated traffic management proposed.</p> <p>The impact on the RLNI Lifeboat Station is addressed at paragraphs 25.7.2.27 and 25.7.2.32 of the Environmental Statement (APP-140). Using the measures set out in the FTMS (REP1-068) described above, the impact is assessed at Table 25.15 of the ES as minor to moderate (not significant).</p> <p>The approach which is to be taken when shared-use paths or cycleways are to be affected by construction works is set out in Section 2.9.3 of the FTMS (REP1-068). This approach includes the requirement to provide temporary cycle facilities should existing provisions be disrupted and no suitable diversionary routes be available, ensuring continuity of provision.</p>
2.4.14	<p>Portsmouth City Council have a contract with Colas for all roadworks and if this is not timed in with their schedule the whole city could grind to a halt for traffic.</p>	<p>The Applicant will seek to work with PCC so that the delivery of the Proposed Development is co-ordinated with other schemes as necessary, taking into account the programme mitigations provided for within the FTMS and the need to deliver the works efficiently so as to minimise impacts.</p>
2.4.15	<p>Financial implications of trying to police/resolve traffic congestion problems.</p>	<p>The FTMS (REP1-068) provides an overview of how the Applicant proposes to deal with traffic management during construction works and mitigating the impact of construction works on the highway network. The cost of implementing and monitoring the measures in the FTMS will be borne by the Applicant.</p>
2.4.16	<p>The emergency services could work in an impossible situation that would undoubtedly occur. The nearest A and E hospital is the Queen Alexander Hospital on the mainland in Cosham and delays getting through clogged up roads could lead to loss of life.</p> <p>What proposals do Aquind put forward to ensure emergency vehicles will not be caught up in traffic?</p>	<p>The relevant emergency services are satisfied with the consultation to date and the mitigation proposed in respect of traffic impacts.</p> <p>The Applicant refers to section 4.4 of the updated Framework Traffic Management Strategy (REP1-068) and section 2.14 of the Onshore Cable Route Construction Impacts on Access to Properties and Car Parking and Communication Strategy included within Appendix 1 of the Framework Traffic Management Strategy.</p> <p>The Framework Traffic Management Strategy confirms that the Applicant will seek to produce a communication plan in partnership with the emergency services (police, fire and ambulance services). The communication plan will outline the relevant procedures to be followed by both parties to ensure the continuous flow of accurate information between, the emergency services and contractors during the construction of the Project. Compliance with the Framework Traffic Management Strategy is secured by Requirement 17 of the dDCO (APP-019).</p>
2.4.17	<p>The section that refers to my street is "TSH/9/a" and "TSH/9/b". There is a dotted yellow line which, according to the legend, means a "temporary stopping up of highway". I would like to know exactly what this means - will my whole street be closed? If so, how long for? When will this</p>	<p>Temporary stopping up of the highway between points TSH/9/a and TSH/9/b relates to temporary road closure of Eastern Avenue which will be required during construction of the Onshore Cable Route only if the final alignment does not use Milton Common.</p> <p>As detailed in Section 10.4 of the FTMS (REP1-068) a road closure would be required on Eastern Avenue for 4 weeks per circuit if this route is used. Should this be the case, construction would be split into 100m sections to allow vehicles to enter / exit Eastern Avenue at all times via Salterns Avenue.</p> <p>As the impacts will be temporary and access retained at all times no compensation is required.</p>

happen? What compensation on will residents receive for the inconvenience caused? If this is going to affect my street the way that it appears it will do on the map (see link), then I believe there is a very strong case for resident compensation.

Table 2.5 – Converter Station and ORS Compound

Ref.	Issue Raised	Applicant's Response
2.5.1	There should be a strategy for management of the landscape and ensuring biodiversity throughout the lifespan of the site, and not merely for the first 5 years of operation as Aquind set out.	<p>There is a strategy for landscape management and maintenance for the life of the Proposed Development where this is necessary, which is secured in accordance with Requirement 8 (implementation and maintenance of landscaping) of the dDCO (REP1-021).</p> <p>The Applicant refers to the Applicant's Response to Written Questions (ExQ1) (REP1-091) LV1.9.37 which confirms monitoring and management of mitigation planting throughout the operational lifetime of the Converter Station. This is reflected in the updated Outline Landscape and Biodiversity Strategy (OLBS) (REP1-034) submitted for Deadline 1. The OLBS also confirms that planting edging the Optical Regeneration Station (ORS) Compound will be managed during the operational lifetime of the Proposed Development (paragraph 1.8.2.1).</p>
2.5.2	Converter station is required to be of a design which is in harmony with its setting.	<p>The Applicant refers to the Applicant's Comments on Local Impact Reports (4.6.12) (REP2-013) which explain that the form of the buildings, of necessity, reflect their function. However, within the necessary technical and operational constraints, the design aims to achieve a harmonious relationship with its setting. The buildings will be carefully designed to be of interest where they may be seen in relatively close views, whilst being visually recessive when viewed from further afield.</p> <p>Appendix 1 - Converter Station Design Approach (MG1.1.3) (REP1-092) is relevant to explaining the design approach to the Converter Station alongside the updated Design and Access Statement (DAS) (REP1-031) submitted for Deadline 1 (in particular the supporting design principles within the DAS document).</p>
2.5.3	<p>Concern about visual impact of the buildings and noise from diesel generators located relatively close to housing</p> <p>ORS compound may cause huge issues for the residents of Fraser Range as well as to the users of Southsea marina, the lifeboat station, the Hayling ferry and people who enjoy the beach near to the Hayling Ferry.</p>	<p>In respect of the visual impact of the buildings, the ES acknowledges that there will be significant effects on residents and recreational users immediately adjacent the landfall both during construction and on completion, reducing over time as the mitigation planting (Figure 15.50 Indicative Landscape Mitigation, APP-283) matures, to be non-significant by year 10 (ES Chapter 15, APP-130, table 15.11 pp15-146 & 147).</p> <p>The Applicant also refers to Appendix 2 Optical Regeneration Station Design Approach (REP1-092) and the updated DAS (REP1-031), which is relevant to explaining the design approach to the ORS.</p> <p>The operational noise effects for the ORS, comprising the four-external heating, ventilation and air-conditioning units, will be negligible, as explained in Paragraphs 24.6.11.24 to 24.6.11.30 of Chapter 24 of the ES (APP-139). As explained in Paragraph 24.4.8.7 of Chapter 24 of the ES, operational air emissions from the ORS back-up generators have been modelled conservatively assuming 24-hour operation for 365 days of the year. The impact of these emissions on human and ecological receptors is predicted to be negligible adverse and not significant as described in paragraphs 23.6.4.18 and 23.6.4.19 of Chapter 23 of the ES (REP1-033).</p>

Ref.	Issue Raised	Applicant's Response
		the two diesel generators located at the ORS would be for emergency use only in the event of an interruption to the local power supply and not during typical operating conditions Therefore, given the very limited period of time that the equipment is expected to operate, the Applicant does not consider the generators represent a concern with respect to noise and air quality.
2.5.4	It is very possible that the interconnector could be built at the same time as a major housing development next door at Fraser Range which will exacerbate the pressure on amenity for local residents even more.	The Applicant's Response to Relevant Representations (REP1-160, Table 2.1) confirms that this development (19/00420/FUL) was considered as part of the original long list of developments in the original cumulative assessment within the ES (APP-144). No significant cumulative effects were identified during construction and operation with regard to local amenity.
2.5.5	<p>ORS buildings at Eastney. Aquind are planning to have a compound at the junction of Fort Cumberland Road and Melville Road housing an "Optical regeneration station".</p> <p>This site will have buildings 3.72m high (about 12') and have a site footprint of 35m x 18m – quite significant close to the seafront – why does it have to be above ground and located there?</p>	<p>Building the ORS underground would increase the flood risk to electrically powered equipment within the building, which would not be acceptable. As well as this, the building requires auxiliary equipment which will be installed above ground. The final floor level of the building has been designed to minimise any increase in flood risk within the area.</p> <p>The ORS will need to be as close as possible and within 1km to where the Marine cable connects to the onshore cable which is at the landfall location at Fort Cumberland Road. Due to the physically constrained urban nature of the cable route, following a consideration of potential alternative locations the car park was identified as the most appropriate location.</p>

Table 2.6 – Installation Process

Ref.	Issue Raised	Applicant's Response
2.6.1	Concern about works in Portsmouth as this land is ex MoD of which is contaminated and therefore cannot be disturbed. Contamination from Victorian tips and later world war two debris from air raids, also land along the eastern road was a tip used by local factories in the 1960s.	<p>The Applicant's Response to Relevant Representations (REP1-160) details the impacts of ex MoD land in Portsmouth and the mitigation measures relevant to the exposure of contaminated land in these areas. The historic military use of the landfall site is not considered to constitute an environmental or human health risk from contamination due to the historical and isolated nature of the site use.</p> <p>Mitigation measures relating to the disturbance and exposure of buried material including tips, WWII debris, and historical landfills are detailed within Section 5.5 of the OOCEMP (REP1-087), compliance with which is secured within Requirement 15 of the dDCO (REP1-021). These mitigation measures include, a UXO and contamination watching brief, and a requirement for excavated waste to be appropriately segregated and handled.</p>
2.6.2	Concern about flooding caused by the drilling.	<p>As reported within the ES Chapter 20 (APP-135) with the secured mitigation measures proposed there are no significant impacts expected upon the flood risk environment.</p> <p>Where the Onshore Cable Route passes an open channel section of a watercourse, HDD works are proposed to avoid works within watercourses. Where proposed at watercourses, the HDD will pass under the watercourse and associated their flood defences with additional specific mitigation to protect the flood risk environment. These measures are detailed within Section 5.7 of the OOCEMP (REP1-087) and secured by Requirement 15 of the draft DCO (REP1-021). The Applicant will be required to obtain</p>

Ref.	Issue Raised	Applicant's Response
		appropriate permits or exemptions from the relevant authority (Environment Agency and/or Lead Local Flood Authority) prior to undertaking these relevant works.
2.6.3	Not too long ago a sink hole was found in Cockleshell and therefore there could be further serious consequences to the drilling underground.	Detailed reviews and investigations to identify karst dissolution features have been undertaken and a strategy for dealing with the unexpected event of encountering new dissolution features is being prepared in discussion with Portsmouth Water and the Environment Agency.

Table 2.7 – Environmental Effects

Ref.	Issue Raised	Applicant's Response
2.7.1	Increase in pollution levels	<p>There will be a temporary increase in air pollutants as a result of the construction process. The overall effect of the construction process has been assessed as negligible, using air quality modelling and assessment methods. These changes are described in the Air Quality Assessment (Chapter 23 of the ES) (REP1-033).</p> <p>Overall, the project will also help to meet the UK's 2050 Net Zero target by reducing CO2 emissions by at least 1.5 million tonnes over the lifetime of the project, as explained in Needs and Benefits Report (APP-115) and Needs and Benefits Addendum (REP1-136).</p>
2.7.2	<p>Worsening of air quality situation. The city has breached the acceptable levels of nitrogen dioxide in the atmosphere for several years. One of the worst breach points in the city is at Velder Avenue - immediately at the southern end of the A2030.</p> <p>This project directly opposes established local and UK Government commitments to cleaner air.</p>	<p>The temporary construction effects resulting from the development will not cause any new exceedances of the limit value for nitrogen dioxide. The overall predicted impact on air quality in the city has been assessed as negligible, and it is stressed that these effects are temporary in duration and transitory in their location dependent on the construction schedule. The air quality impacts are described in the Air Quality Assessment (Chapter 23 of the ES) (REP1-033).</p> <p>A specific sensitivity test was undertaken on Velder Avenue due to concerns over traffic conditions and pollutant concentrations within Portsmouth AQMA N°9 as described in Appendix 23.8 of the air quality assessment (REP1-078). This study was undertaken on the basis that fewer drivers would divert their preferred traffic route than was initially predicted. Where the Air Quality Assessment (REP1-033) found predicted improvements in concentrations of nitrogen dioxide during the temporary period when works will be undertaken, the sensitivity test found small deteriorations that were assessed as negligible.</p> <p>In the absence of a 2020 Annual Status Report from PCC, data from PCC's 2019 Annual Status Report shows that none of the monitoring locations around Velder Avenue at the southern end of the A2030 were in breach of the limit value for nitrogen dioxide.</p> <p>The Proposed Development does not directly or otherwise oppose established local and UK Government commitments to cleaner air.</p>
2.7.3	The outline project case implies environmental benefit, stating that "Carbon dioxide emissions are projected to reduce overall with the introduction of AQUIND". No detail or evidence to substantiate these claims or show how they are to be measured. In fact, the reduction in CO2 emissions is qualified as being "mainly driven by a reduction in more	As stated within the ES Chapter 28 (Carbon and Climate Change) (APP-143), paragraph 28.4.2, changes in operational emissions from generating plant due to the transfer of electricity over the interconnector were calculated using the European Network of Transmission System Operators for Electricity Ten Years Network Development Plan (TYNDP) for 2016 and 2018 scenarios. By using the average range (which is considered to be most likely prediction), emissions reductions due to the Proposed Development over its lifespan (40 years) are expected to be approximately -1,716,000 tCO2e.

Ref.	Issue Raised	Applicant's Response
	carbon-intensive GB generation". Given the trajectory with the green agenda, there is no alternative but to reduce carbon-intensive energy generation, so it remains unclear as to how the interconnector will directly contribute to any reduction.	<p>This means that the net emissions (emissions increases minus emissions reductions), due to the operation of the scheme over the lifespan of the Proposed Development, are a reduction in emissions of approximately -1,529,000 tCO₂e (net operational emissions).</p> <p>Table 28.4 of the ES separately identifies the increase in emissions during the construction of the project as 256,563 tCO₂e.</p> <p>This is an appropriate methodology to assess carbon savings from interconnectors.</p> <p>The Proposed Development contributes to the green agenda, rather than its benefits being diminished by it as suggested.</p>
2.7.4	Concern due to the environmental impacts at the landing point on the beach in Eastney immediately adjacent to a part of the beach which is an SSSI.	<p>There would be no works carried out on Eastney Beach as part of the Proposed Development.</p> <p>The impacts, in relation to the Proposed Development, have been assessed and are reported in the Environmental Statement documentation. See documents APP-116 to APP-145, as well as the Environmental Statement Addendum (REP1-139) for the environmental impact assessment.</p>
2.7.5	Has Natural England been briefed about the disruption to the allotments and the nature reserves, as there is not a mitigation licence from them or a report from an ecologist on the planning inspectorate's documents online?	<p>No allotment plots will be affected by the construction or operation of the Proposed Development.</p> <p>Consultation with Natural England has been on-going pre-Examination and throughout the Examination, as described in ES Chapter 16 Onshore Ecology (APP-131). The Applicant remains engaged with Natural England.</p> <p>ES Chapter 16 Onshore Ecology (APP-131), and the Environmental Statement Addendum (REP1-139) assess effects on ecological features as a result of the Proposed Development. These are supported by ecological reports detailing survey work and other types of study used to inform the assessment, included as appendices to ES Chapter 16. The assessment determined that the Proposed Development would not lead to significant adverse effects on ecological features including statutory and non-statutory designated wildlife sites. In addition, effects on the allotments will be avoided during construction by the use of HDD. As the cable will be buried, the allotments will not be affected during its operation.</p> <p>With respect to mitigation licences, badger is the only protected species that is subject to such a requirement. A Letter of No Impediment (APP-490), has been agreed with Natural England, as it is not possible to discharge this requirement until after the DCO has been granted.</p>
2.7.6	Unnecessary noise	<p>No 'unnecessary noise' will be created as part of the Proposed Development. During construction, best practice mitigation measures will be employed to ensure that levels of noise are reduced as far as reasonably practicable. Please refer to section 5.12 of the Onshore Outline CEMP (REP1-087) for further information.</p> <p>With respect to operational noise, please refer to the points made in Table 5.17 of the Applicant's Response to Relevant Representations (REP1-160). In summary, following the inclusion of mitigation measures, the operational noise effects of the Converter Station and ORS are negligible.</p>

Table 2.8 – Wildlife

Ref.	Issue Raised	Applicant's Response
2.8.1	<p>Potential for a profound impact on wildlife and habitats (including important species like the Brent Goose, Dartford Warbler, Newts, swans, Hawks, oysters, molluscs etc.).</p> <p>Areas of concern: Milton Green, Milton Allotments, The Three Lakes, Eastney Allotments, Milton Locks, Milton Common, Langstone Harbour, Eastney Beach and Farlington Marshes</p>	<p>Impacts of the Proposed Development on ecological features, including Statutory and Non-Statutory Designated Sites, wintering wildfowl and breeding birds, have been assessed in ES Chapter 16 Onshore Ecology (APP-131). Ecological features have influenced design of the Proposed Scheme, which incorporates avoidance measures such as HDD and embedded mitigation such as pollution prevention controls and buffers from features such as ancient woodland. Where necessary mitigation to offset potential effects has been incorporated also. The assessment determined that the Proposed Development would not lead to significant adverse effects on ecological features.</p>
2.8.2	<p>Has the effect on Great Crested Newts been taken into consideration when considering changing the route through the allotments and, with the original plan to follow the allotment path. Has Natural England been briefed about this as we have not seen a mitigation licence from them or a report from an ecologist on the planning inspectorate's documents online?</p> <p>It is illegal under the 1981 Wildlife and Countryside Act to hurt, kill (or merely just disturb in the case of newts) those animals.</p>	<p>Survey work supporting the assessment in ES Chapter 16 Onshore Ecology (APP-131) did not identify the presence of great crested newts. They will therefore not be affected by the Proposed Development and were scoped out of the assessment. As a result, there will not be any need for mitigation licensing. While great crested newts have been scoped out of the assessment, precautionary methods of working for reptiles (as outlined in the updated Onshore Outline Construction Environmental Management Plan; REP1-087) would be relevant in the event that newts are present in terrestrial habitat. These include: removal of natural refugia by hand where safe to do so, or otherwise undertaken methodically using plant under ecological supervision; plant and machinery to be kept to defined access routes around the survey area, until suitable habitat in the works area has been removed; and open excavations will be fitted with mammal ladders (planks of wood at either end) to allow animals to climb out if they fall in, and prevent the trapping of animals.</p> <p>Impacts of the Proposed Development on ecological features, including protected species, have been assessed in ES Chapter 16 Onshore Ecology (APP-131). The assessment determined that the Proposed Development would not lead to significant adverse effects on ecological features.</p> <p>Badgers are the only protected species that is subject to such a requirement. A Letter of No Impediment (APP-490), has been agreed with Natural England, as it is not possible to discharge this requirement until after the DCO has been granted.</p>
2.8.3	<p>Prime Minister announced plans to increase natural habitats and protect more wildlife by 3% - how does this fit with that?</p>	<p>The Biodiversity Position Paper (REP1-138) provides details of the Proposed Development's position with regard to local and national policy and the actions taken to avoid, minimise and remediate potential impacts on biodiversity. These actions result in bespoke management (at Denmead Meadows) and net gains for all habitats of principal importance (priority habitats) as included within the OLBS (REP1-034).</p>
2.8.4	<p>Where exactly are all the precious wildlife being re-homed to and what are its percentages of survival thereafter?</p>	<p>Impacts of the Proposed Development on ecological features, including protected species, have been assessed in ES Chapter 16 Onshore Ecology (APP-131). The assessment determined that the Proposed Development would not lead to significant adverse effects on ecological features.</p>

Table 2.9 – Impact on Residents

Ref.	Issue Raised	Applicant's Response
2.9.1	No benefit to the city of Portsmouth and no compensation to the huge number of residents who will have their lives disrupted and their environment and quality of life degraded.	<p>The Position Statement on Planning Obligations in connection with the Proposed Development (REP1-135) confirms that mitigation has been identified to reduce any effects and that additional planning obligations are not considered to be required. In addition, the Needs and Benefits Report (APP-115) and Addendum (REP1-136) identifies local benefits to Portsmouth such as employment generation, reduction in wholesale energy costs and a more reliable supply in the South East.</p> <p>No compensation is properly payable in connection with the construction of the Proposed Development.</p>
2.9.2	No mitigation plans to minimise impact on local residents	<p>Please refer to the Mitigation Schedule (REP2-005) which sets out all of the mitigation controls and other best practice measures identified in the Environmental Statement (APP-116 – APP-145) and identifies the means by which those controls and measures will be secured. The existing mitigation measures proposed are considered appropriate to mitigate the identified 'likely significant effects' of the Proposed Development, including on in respect of impacts on local residents.</p>
2.9.3	Safety and electromagnetic radiation concerns, effect on physical well-being of residents (particularly on those with asthma).	<p>The Applicant carried out studies aligned with UK policies which are based on the 1999 EU Recommendation (The Council of the European Union, 1999) and NRPB 2004 advice (National Radiological Protection Board, 2004) to implement the 1994 ICNIRP. The Electric Field Report (APP-136) considers the proposed cable depth, insulation and sheathing materials and confirms that electromagnetic radiation emissions will be well below the levels recommend by the guidelines and no adverse effect on the public would arise.</p> <p>In addition, Chapter 26 Human Health of the Environmental Statement (APP-141), Section 26.6.3.70 states that due to the grounded shielding of the HVDC Onshore Cable there will be no electric field present along the HVDC Cable Route. The public would therefore not be exposed to electric fields from the Onshore Cable Corridor because the field is contained by the cable's protective metal sheath.</p> <p>Chapter 26 Human Health of the Environmental Statement (APP-141) Sections 26.6.3.71 and 26.6.3.72 also states that the magnetic field strength from the HVDC Cable is well below the guidelines.</p> <p>The HVAC route will be very short between the converter station and Lovedean substation where there are no nearby residences. It is also well below the levels recommend by the guidelines.</p> <p>In summary the EMF impacts of the HVDC and HVAC cables will not affect the well-being of residents or other members of the public as the electric and magnetic fields are well below the levels recommend by the guidelines.</p>
2.9.4	Effect on physical health and mental well-being of residents.	<p>The Applicant has given full consideration to potential effects on human health as detailed in Chapter 26 Human Health (APP-141).</p> <p>The assessment within Chapter 26 Human Health (APP-141) is informed by the assessments of significant residual effects generated from other topics in the Environmental Statement which have associated consideration of human health or aspects that effect human health. In particular, this includes the consideration of Chapter 15 (Landscape and Visual Amenity) (APP-130), Chapter 18 (Ground Conditions) (APP-133), Chapter 19 (Groundwater) (APP-134), Chapter 20 (Surface Water Resource and Flood Risk) (APP-135); Chapter 22 (Traffic and Transport) (APP-137), Chapter 23 (Air Quality) (REP1-033), Chapter 24 (Noise and Vibration) (APP-139) and Chapter 25 (Socio-economics) (APP-140). In addition, consideration of EMF is detailed within Appendix 3.7 Onshore Electric and Magnetic Field Report (APP-361).</p>

Ref.	Issue Raised	Applicant's Response
		<p>During construction, residual significant adverse effects are predicted on health during the construction of the Proposed Development due to the generation of noise emissions during the construction of the Onshore Cables. No other residual significant effects are anticipated from the operation or construction of the Proposed Development.</p> <p>During operation, there will not be any residual significant effects on human health.</p>
2.9.5	<p>Effect on mental health patients from a nearby hospital who have been using the community allotments in Eastney for many years for the purposes of therapeutic activities.</p>	<p>No allotment plots will be affected by the construction or operation of the Proposed Development.</p> <p>Chapter 26 Human Health (APP-141), Section 26.6.3.33 identifies that Milton and Eastney Allotments are within the Order limits, however, effects on the surface in this location are avoided through the use of HDD which travels underneath these sites and access would not be impacted.</p> <p>It is recognised in Chapter 26 Human Health (APP-141), Section 26.6.3.37, that green spaces within the Order limits and within close proximity to the Onshore Cable Corridor will experience temporary perceived reduced recreational quality and reduced amenity value due to construction activities.</p> <p>Chapter 26 Human Health (APP-141), Section 26.6.3.41 identifies that the overall effect on human health associated with the temporary changes to landscape and green space associated with Onshore Cable Corridor is anticipated to have a temporary, medium-term minor adverse effect (not significant) on human health during construction for the general population and vulnerable groups. This includes all loss of greenspace and is not specific to the allotments, which are not affected due to use of HDD underneath.</p> <p>Chapter 25 Socio-economics (APP-140), Table 25.15 identified that the impacts of temporary loss of recreational areas and amenity are Negligible / None (not significant). The use of HDD forms embedded mitigation to avoid direct impacts on the allotments.</p>
2.9.6	<p>Disruption to important local facilities such as football and cricket pitches and sailing clubs for a sustained period.</p>	<p>Table 25.15 within Chapter 25 (Socio-economics) of the ES (APP-140) summarises the anticipated effects on open spaces including parks and playing fields, some of which are significant due to the duration of the impact.</p> <p>Table 25.15 states that sailing clubs will only be affected in relation to access, which is managed through the FTMS (REP1-068) and the effect is not significant.</p> <p>Mitigation measures identified which are also included in the OOCEMP (REP1-087) include consultation with affected groups, Contractor's review of programme and construction area requirements to reduce effects on open space (also see Section 25.9.5 of Chapter 25 (Socio-economics)).</p> <p>The Applicant has drafted a Framework Management Plan for Recreational Impacts (REP1-144) to guide the mitigation on sports pitches through minimising working areas as well as phasing of construction outside of playing seasons where possible.</p> <p>The Applicant is continuing to seek engagement with Portsmouth City Council in relation to measures to mitigate the temporary impacts on green spaces in Portsmouth. (Chapter 25 Socio-economics (APP-140), paragraph 25.7.2.1).</p>
2.9.7	<p>Aquind proposal would generate significant unpleasant smells as it is not possible to dig up low-lying areas without releasing odours of a displeasing nature.</p>	<p>Chapter 23 Air Quality Assessment (REP1-033) Table 23.3 scoped out the assessment of odour on the basis that no odour producing activities are planned to be undertaken as part of the Proposed Development.</p>

Ref.	Issue Raised	Applicant's Response
		Notwithstanding this, mitigation measures are included in Section 5.5 and 6.9.2 of the OOCEMP (REP1-087) to minimise odour risk due to contaminated ground e.g. from landfills including the cable trench will need to be excavated in short lengths, odour monitoring with agreed red/amber, green alerts with associated actions to reduce impacts and odour control such as the installation of a perimeter fog and misting system.
2.9.8	Suggestion that commitments such as financial compensation or construction of a nature reserve would make the project more worthwhile to local residents.	The existing mitigation measures proposed are considered appropriate to mitigate the identified 'likely significant effects' of the Proposed Development.
2.9.9	What do you intend to do moving forward to alleviate this worry and reassure the residents affected?	<p>The Applicant does not intend to undertake any informal exercises outside of the Examination, as it is considered that the Examination is the appropriate forum in which to address issues which are raised so as to ensure those matters are understood and taken into account in the decision on the Application.</p> <p>The Applicant confirms that it remains contactable by any person using the freephone information helpline - 01962 893869, email address - aquindconsultation@becg.com and FREEPOST – AQUIND CONSULTATION, and that it will continue to promptly respond to any queries in relation to the Proposed Development.</p>
2.9.10	What financial benefit will we be getting from this proposal?	<p>The Needs and Benefits Report (APP-115) identifies the benefits of AQUIND Interconnector in relation to ancillary services, tax revenue, new employment opportunities and wider economic activity (Section 2.4).</p> <p>As summarised in Section 2.4, the Proposed Development would reduce wholesale electricity prices, by enhancing the security of supply and by helping renewables integration. In addition, it is expected to generate tax revenue for the Treasury and create new employment opportunities during construction..</p>

Table 2.10 – Rationale for Proposed Development

Ref.	Issue Raised	Applicant's Response
2.10.1	There is already capacity at an existing interconnector further east near Brighton and Eastbourne.	As set out in the Needs and Benefits Report (APP-115), interconnectors are a well-established feature of electricity markets in Europe. GB is currently connected by five existing Interconnectors to France, Ireland, the Netherlands and Belgium with a combined capacity of 4,500 Megawatts ('MW'), with an additional connection between Scotland and Northern Ireland (with a capacity of 500 MW). A further nine Interconnectors (in addition to AQUIND Interconnector) are currently being planned to be developed by 2025 between GB and neighbouring countries, amounting to more than 10 Gigawatts ('GW') of additional capacity. The need for additional interconnectors is recognised by the UK Government and reflected in its policy, and a full summary of the need for more GB interconnectors is set out in Section 2 of the Needs and Benefits Report.
2.10.2	There are already 5 interconnectors. Do we really need a sixth interconnector?	Yes. The Needs and Benefits Report (APP-115) sets out the established need for greater interconnection (Section 2.2) and the specific role of the Proposed Development in resolving the "energy trilemma" of affordability, security and decarbonisation of energy supply (Section 2.3). This is set within the context of UK Government Policy for Nationally Significant Infrastructure Projects, the support for more electricity interconnector projects in other Government statements, the prevailing climate change targets, the European policy context and the potential Brexit implications.

Ref.	Issue Raised	Applicant's Response
2.10.3	No evidence to support the statement that the Interconnector will foster greater renewable power integration.	<p>The Needs and Benefits Report (APP-115) and Addendum (REP1-136) set out the specific role of the Proposed Development in resolving the “energy trilemma” of affordability, security and decarbonisation of energy supply.</p> <p>As set out in the response to Ref 2.10.3. above and in greater detail at Section 3 of the Addendum to the Needs and Benefits Report (REP1-136), the Proposed Development can deliver the required flexibility to balance supply and demand, and thus facilitate the integration of renewable generation. As a result, the Proposed Development is estimated to lead to a net reduction in emissions of approximately 1.53m tCO₂e over its operational lifespan.</p>
2.10.4	Brexit concerns	Please refer to the Applicant's response to ExQ1 MG1.1.27 within the Response to Written Questions (REP1-091). The response confirms that the implications of Brexit on the continued operation of all interconnectors in the UK are discussed in Section 3.6 of the Needs and Benefits Report (APP-115), and that, whilst the position following the transition period continues to be negotiated, there will still be a need for more interconnection between GB and France irrespective of Brexit.
2.10.5	Interconnector will not increase competition across energy markets as there is already healthy competition in the UK energy market.	A full summary and explanation of how the Proposed Development will boost competition on energy markets is set out within the Needs and Benefits Report (APP-115) and Addendum (REP1-136).
2.10.6	What is the reason and need of laying this cable and what is it for?	The Needs and Benefits Report (APP-115) sets out the established need for greater interconnection (section 2.2) and the specific role of AQUIND Interconnector in resolving the “energy trilemma” of affordability, security and decarbonisation of energy supply (section 2.3). This is set within the context of UK Government Policy for Nationally Significant Infrastructure Projects (NSIPs) (section 3.2), the support for more electricity interconnector projects in other Government statements (section 3.3), the prevailing climate change targets (section 3.4), the European policy context and potential Brexit implications (section 3.5).

Table 2.11 – Regulation and Consents

Ref.	Issue Raised	Applicant's Response
2.11.1	AQUIND have gone for the route where the consents due, come from local authorities instead of Highways England and or multiple farmers and landowners. Is this for financial reasons?	<p>The consent required to implement and maintain the Proposed Development is granted by the Secretary of State for Business, Energy and Industrial Strategy in accordance with the Planning Act 2008. The consent route was determined by the Secretary of State under s35 of the Planning Act 2008 and was not made for financial reasons but because of the national significance of the Proposed Development.</p> <p>The reasons for selecting the final option for the Proposed Development are set out in Chapter 2: Consideration of Alternatives of the ES (APP-117) and the Supplementary Alternatives Chapter (REP1-152)</p>
2.11.2	Application for the CPO of public highway. There is no reason why Aquind need to own the land the cable will run through. When you consider the length of the route, and the complexities of creating multiple new titles (should this application be granted) leases along the public highway would suffice. It will also make it more	<p>The Applicant does not seek, and has never sought to, acquire land which forms the highway.</p> <p>The position regarding the acquisition of land beneath the highway is fully explained in the ‘Statement in Relation to Highway Subsoil Acquisition’ submitted at Deadline 1 (REP1-131).</p> <p>Where cables are installed in the Highway, CPO is not applicable and they will be installed pursuant to statutory authority in accordance with the NRSWA 1991, as applied by Articles 11 and 12 of the dDCO (REP1-021).</p>

Ref.	Issue Raised	Applicant's Response
	complicated in terms of ongoing road maintenance, public liability and other utilities such as the Gas networks who are used to working with local authorities in such matters.	Where the Proposed Development is situated at a depth which is below the area which is vested in the Highway Authority, it is absolutely necessary to acquire rights over such land to ensure the position is legally documented and there is not impediment to the delivery of the Proposed Development. It is for this reason rights to acquire the subsoil beneath the highway are sought. The location of the Proposed Development will be governed by appropriate protective provisions in relation to other assets in the highway and being akin to other utilities infrastructure located in the highway will not make road maintenance more complicated or cause any public liability issues.
2.11.3	How are the owners of Aquind engaging with the "relevant EU national regulators"?	The Applicant refers to the responses to Written Questions (ExQ1) (REP1-091) CA1.3.92. The Applicant is engaged in discussions with the relevant regulators however these discussions are commercially sensitive and confidential.

Table 2.12 – Economy of Portsmouth

Ref.	Issue Raised	Applicant's Response
2.12.1	Harming access to the city for this length of time, will have a profound negative economic impact on a city which already has challenges with deprivation and poverty.	Chapter 25 (Socio-economics) of the 2019 ES (APP-140) assesses the impacts of the Proposed Development upon socio-economic considerations, including disruption, change in access to local residences and commercial businesses (including shops and other services) during construction. The assessment concludes that effects resulting from the Proposed Development will not be significant.
2.12.2	Employment and Skills Plan is to be required.	As set out in the Applicant's Comments on the Local Impact Reports (REP2-013, Table 7.11), given that predicted construction employment is not assessed as significant, the Applicant does not believe an ESP is required in this instance. The measures set out at Paragraph 25.9.2.1 of the ES (APP-140) in relation to employment, also appear in section 5.12.1.1 of the OOCEMP (REP1-087). Flexibility to their application needs to remain as this will depend on whether the nature of the construction work allows these opportunities.
2.12.3	Concern about rhetoric of "job creation and economic revenue" as any jobs created would be short term at best, and the fundamental point of any infrastructure improvements such as this is to remove the need for human oversight at large, thus meaning less jobs in the long term than are currently available.	Chapter 25 (Socio-economics) of the 2019 ES (APP-140) assesses the impacts of the Proposed Development upon socio-economic considerations and the Needs and Benefits Report (APP-115) identifies the wider benefits of AQUIND Interconnector in relation to ancillary services, new employment opportunities and wider economic activity (Section 2.4). It is acknowledged, as set out at paragraph 25.7.2.12. of Chapter 25, that given that the levels of existing employment in the study area are consistent with the national and regional averages, and local job creation is limited, the magnitude of change which would be caused by the Proposed Development is considered to be low. Notwithstanding this, the ES concluded that the Proposed Development would have a beneficial, though temporary effect on the local economy during the Construction Stage through using local labour and supporting local businesses through expenditure from direct spend on materials and services for the Proposed Development. There would also be beneficial effects from any construction labour employed from outside of the region who would need to use local hotels and/or restaurants.
2.12.4	Impact on tourism.	Impacts on tourism are described in paragraphs 25.7.2.42-25.7.2.46 of the Environmental Statement (APP-140). The majority of impacts are assessed as not significant, including impacts on tourism to the South Downs National Park, Southsea Marina and Boatyard, Eastney Beam Engine House Museum and Harbourside Leisure Park, as well as other receptors listed in section 25.5.12

Ref.	Issue Raised	Applicant's Response
		of Chapter 25. A moderate (significant) effect was assessed for festivals using Farlington Playing Fields and visitors to Southsea Leisure Park.
2.12.5	No indication of timescales for the work. How long will this project take to complete?	An indicative construction programme has been provided in the Environmental Statement Non-Technical Summary (REP1-079). The construction is likely to take approximately three years to complete, indicatively from Quarter 3 2021 to Quarter 2 2024.

3. MATTERS RAISED IN WRITTEN REPRESENTATIONS NOT RELEVANT TO THE EXAMINATION

Table 3.1 – Matters Raised in Written Representations not Relevant to the Examination

Ref.	Matter Raised	Reasons for not being relevant to the Examination
3.1.1	Concerns about AQUIND’s relationship with the Conservative Party and Donations of Aquind to the Conservative Party.	Political donations made on behalf of AQUIND Limited to the Conservative Party are not a matter which has any relevance to this Application and its examination and determination, having no planning purpose and not having any connection with the Proposed Development.
3.1.2	Complex corporate structure of AQUIND with an example from Companies House.	Whilst it is acknowledged that in connection with the proposed powers of compulsory acquisition sought in the DCO an applicant must be able to demonstrate that there is a reasonable prospect of the requisite funds for acquisition becoming available, and that an applicant’s corporate standing may be a matter which is relevant in determining whether that it is the case, information has been provided in the Funding Statement [APP-023] regarding the corporate structure of AQUIND Limited and its assets, and the further consideration of the corporate structure of AQUIND Limited and the extent to which this may be complex is not a matter which is considered to be important and relevant.
3.1.3	Links to Russia [or France].	The nationality of persons involved in the promotion of AQUIND Interconnector is not a matter which has a genuine planning bearing or which is fairly and reasonably related to the Proposed Development.
3.1.4	How was this contract tendered for? What other companies were included?	The Proposed Development is development which is promoted by AQUIND Limited. Information in relation to any procurement exercise for the construction of AQUIND Interconnector is not a matter which has a planning bearing relating to the character and use of the land to be affected by the Proposed Development. It is therefore not considered to be a matter which is important or relevant for the purpose of the examination and determination of the Application.
3.1.5	Why is the identity of head of company restricted information?	The position with regard to the filings at Companies House in relation to AQUIND Limited and any lawful exemptions which are applied in relation to information regarding the identity of the shareholders of AQUIND Limited is not a matter which has a planning bearing or which is fairly and reasonably related to the Proposed Development. It is therefore not considered this is a relevant matter.
3.1.6	Lack of clarity and specificity from Aquind and overly-complicated/technical, ever-changing plans (ex. Milton allotments are being affected now). Inconsistency in plans.	The Applicant has prepared documents in support of the Application and during the Examination in line with the Planning Act 2008 and the ExA’s requirements. It is therefore not considered this is a relevant matter.
3.1.7	Extremely difficult for interested residents to access the relevant information via the website; Maps are difficult to read because they are too small, environmental reports are challenging to download because of	The organisation of the Planning Inspectorate’s website is outside of the Applicant’s control. Low resolution versions of plans to make them easier to open have been prepared and submitted at the Inspectorate’s request. Whilst the Applicant’s Acceptance Update Newsletter published in January 2020 is also not a relevant matter, the Applicant disagrees that the Acceptance Update Newsletter was unhelpful. The newsletter was issued to provide an update regarding progress of the project, given

Ref.	Matter Raised	Reasons for not being relevant to the Examination
	their sheer size, the 'Community Newsletter' is unhelpful.	<p>that a reasonable length of time had lapsed between the close of the February – April 2019 consultation and the Acceptance of the application.</p> <p>The newsletter clearly set out the changes that had been made to the proposals as a result of the feedback received to the February – April 2019 consultation, together with details of how to view the application documents, an explanation of how individuals could register as an Interested Party with PINS to partake in the Examination, and projected forward timescales for the project, including the Examination. All information included in the newsletter was accurate at the time of publication.</p>
3.1.8	The Covid 19 crisis has made it extremely difficult for residents to find out about recent changes to Aquind's plans. Not all residents have access to social media although even here, information has been scant. Residents need to be far more informed about changes to the plans and the restrictions caused by Covid must be taken into account by Aquind.	The restrictions caused by Covid-19 have been considered by the Inspectorate and by the Applicant where possible in accordance with Regulations. Documents are uploaded to the Inspectorate's website in accordance with the Examination process to inform of the processes to be undertaken to progress the Examination in light of the COVID-19 pandemic.
3.1.9	<p>Concern about the origin of the energy. Opinion that it is inadvisable to be purchasing energy from France, especially as this is most likely nuclear generated. Money invested in this project would be better spent on renewables.</p> <p>The expansion of UK offshore wind generation will make the project unnecessary.</p>	The origin of the energy and the use of renewable energy is a matter of Government policy and is therefore not relevant to the examination of the Proposed Development.
3.1.10	Why this is being implemented with breach of a previously agreed contract with Eurostar?	The Applicant never had any contracts with Eurostar, nor is it aware of any contracts with Eurostar that could be of any relevance.
3.1.11	Concern about whether this scheme should be considered to be of a type which has the characteristics of a "generating station" with associated to it conditions.	A Section 35 Direction has been issued in relation to the Proposed Development and sets out the basis on which the decision to issue that direction was made and the position in relation to the applicability of the NPS. This is not a matter which is relevant to be considered during the examination. That the Proposed Development is development for which development consent is required is established.

