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Mrs Flick Drummond MP
House of Commons
London
SW1A 0AA

16 November 2020

AQUIND Interconnector

Dear Mrs Drummond,

Further to your recent representation to the Planning Inspectorate regarding the proposals for AQUIND Interconnector, dated 5th October 2020, I wanted to get in touch to hopefully provide some clarity on the matters you have drawn attention within your correspondence.

The selection of the location for the proposals for AQUIND Interconnector, including the Converter Station location, landfall location and onshore cable route, has been determined by an assessment of the reasonable alternatives, which applied a process of staged filtering, increasing knowledge of the individual options, so as to proportionately consider them from a technical, cost and environmental perspective.

In seeking to identify the most appropriate cable corridor for the project, initial appraisals indicated that burying the onshore cables would minimise the long-term impact of the project by avoiding the need to construct overhead power lines and the visual impacts associated with such lines. While it was recognised that the selection of a highways route would generate temporary traffic disruption, and an associated need for temporary traffic management measures, this approach was preferred for the installation of the onshore cables, when compared to a cross-country route, on the basis that it would minimise the long-term impacts of the project by:

- Reducing impacts on ecology, archaeology and associated designations;
- Reducing impact on agricultural/open land associated with the weight of the large cable drums, agricultural disruption of laying cables and the potential sterilisation of land above the cables (for maintenance purposes);
- Avoiding risk of accidental damage from farming operations;
- Reducing impact on future development sites (greenfield) in an area with significant housing need through installation within the existing highway network;
- Avoiding the need to develop greenfield land;
- Enabling the use verges alongside major roads, where possible, to reduce potential for lane closures and limit highway impacts associated with construction.

A summary of the cable routes assessed by AQUIND, following the identification the existing National Grid substation at Lovedean as the preferred connection location for AQUIND Interconnector, is

provided at Section 2.4.11 in the Alternatives Chapter of the Environmental Statement (ES)¹ and within the Supplementary Alternatives Chapter included as part of the ES Addendum².

A number of additional, alternative cable routes, including the 'countryside route' suggested by local authorities such as Winchester City Council and Hampshire County Council, have also been considered by AQUIND as part of the planning process. The suggested countryside route, for example, which would see the cable corridor pass through the open countryside to the west of Purbrook, has been considered by AQUIND both before the request for this route to be considered was made by Winchester City Council and Havant Borough Council in response to the 2019 consultation and further following this request.

The assessment undertaken, which considered the countryside route in comparison to the route along the highway, identified that the countryside route was not preferred for a variety of reasons, which are fully explained at Section 2.6.4 in the Alternatives Chapter of the Environmental Statement (ES)³ and section 8 of the Supplementary Alternatives Chapter included as part of the ES Addendum⁴, where you will also find further information on the consideration of the reasonable alternatives studied by AQUIND for the connection locations, the location of the landfall and for the onshore cable route.

In relation to your question about remediation and legacy, I should begin by noting that interconnectors, are transmission links, as opposed to generators of electricity, and AQUIND Interconnector will have capacity to transmit approximately up to 5% of Great Britain's total electricity consumption per annum – enough to keep the lights on in up to 5 million British households.

It is considered that the planning mitigations proposed to be secured are appropriate and proportionate to mitigate the impacts of the proposed development. Further, to date it has not been evidenced how community contributions would satisfy the relevant legislative tests to be valid planning obligations (i.e. by being necessary to mitigate an impact of the development and fairly and reasonably related in scale and kind). It is not the case that the guidance which is specifically applicable to offshore wind farm installations is applicable to the proposed development.

AQUIND is committed to mitigating the impacts of the proposed development and where opportunities arise for such mitigation measures, AQUIND's approach is to ensure that these are captured via the requirements of the Development Consent Order (akin to planning conditions) or, where appropriate, by way of a Development Consent obligation (the DCO version of a Section 106 Agreement).

AQUIND has carefully considered the impacts of the proposed Converter Station at Lovedean on the local area and the South Downs National Park (SDNP) as part of its assessment of the reasonable alternatives, and further as part of the design and further environmental impact assessments undertaken in relation to the proposals for the location of the Converter Station in proximity to the

¹ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-000570-6.1.2%20ES%20-%20Vol%201%20-%20Chapter%20%20Consideration%20of%20Alternatives.pdf>

² <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-001488-7.8.1.3%20ES%20Addendum%20->

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

⁴ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-001488-7.8.1.3%20ES%20Addendum%20->

existing Lovedean substation. AQUIND has undertaken substantial consultation with relevant stakeholders, including Winchester City Council, East Hampshire District Council and South Downs National Park Authority on the spatial parameters and 'design principles' which the final design of the Converter Station will be required to comply with. These discussions have informed the development of these principles, including the use of autumnal colours and the use of horizontal cladding, which will minimise the impact upon the setting of the National Park.

With regard to the temporary traffic impacts of the project during construction, traffic management measures will be required during the installation of the cables, although road closures will be avoided save for in very limited instances, and access to homes and businesses will be maintained throughout the construction phase. No part of the cables will be laid within the boundary of any homes or gardens. A Framework Traffic Management Strategy (FTMS)⁵ was submitted with the DCO application which contains a range of proposed mitigation measures including restrictions on when works may be undertaken in certain locations and proximity to one another that accounts for environmental constraints, major public events, school term times and other restrictions to minimise impacts. Such mitigation includes overnight working in specific areas to minimise the length of the installation period.

The impacts of construction traffic associated within the Converter Station will be mitigated through measures contained within the Framework Construction Traffic Management Plan (FCTMP). This document provides a strategy for controlling construction traffic movements through use of prescribed and prohibited traffic routes, restrictions on timings of movements and mechanisms for monitoring and enforcement of these measures. AQUIND is currently in discussions with Hampshire County Council and is confident of agreeing the contents of the FTMCP as acceptable to the Highway Authority during the Examination period.

With regard to your query around cable faults and maintenance, the cables and joints do not require any maintenance. Cable faults do occur, albeit these are very rare in occurrence, and the usual cause of this is third party damage. Therefore, the maintenance process will predominantly include regular visual inspections of the cable route and joint bays only to check for anything that could result in damage to the cable system infrastructure.

Moving to your comments regarding the landscape strategy for the Converter Station site, detailed landscaping scheme(s) will be prepared subject to consent and will be informed by the Outline Landscape and Biodiversity Strategy⁶. The detailed landscaping scheme(s) will include detailed landscape mitigation plans together with management, maintenance and monitoring plans and prescriptions. These documents will include periodic reviews and management responsibilities for all different landscape / habitats to ensure the full and successful establishment of planting. The detailed landscaping scheme(s) will cover the operational lifetime of the Converter Station and Optical Regeneration Stations and include both new and replacement planting. Again, substantial

⁵ https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-001567-6.3.22.1A%20ES%20-%20Vol%203%20-%20Framework%20Traffic%20Management%20Strategy%20Rev002_clean.pdf

⁶ https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-001588-6.10%20Outline%20Landscape%20and%20Biodiversity%20Strategy%20Rev002_clean.pdf

consultation has been undertaken with relevant stakeholders, including Winchester City Council, East Hampshire District Council and South Downs National Park Authority, in relation to the proposals for landscape mitigations and ecological enhancements.

Proposals identified in the Outline Landscape and Biodiversity Strategy⁷ and indicative landscape mitigation plans^{8 9 10} seek to maximise opportunities for biodiversity ranging from the extension of ancient woodland, introduction new woodlands, hedgerows, scrub and grassland to the management of existing features.

Finally, with regard to the Employment and Skills Plan you have suggested, AQUIND is continuing to discuss with the relevant local planning authorities the potential for measures related to employment and skills to be captured in connection with the Proposed Development, albeit taking into account the specialist nature of the construction activities to be undertaken and in turn the specialist contractors required to carry out this work. AQUIND does not wish to agree to measures which will not be achievable in practice, as this would not be in any party's interest.

Notwithstanding this, AQUIND is committed to engaging with the relevant local authorities, alongside local and specialist contractor(s) and other stakeholders, at the appropriate time to identify opportunities for local employment and skills. I can confirm that AQUIND will in accordance with the Onshore Outline Construction Environmental Management Plan¹¹ encourage the appointed contractor(s) to use local labour and advertise employment opportunities locally, where practicable. The construction of the project will also provide a significant economic boost, with around 500 jobs created by the UK onshore and marine construction, and ongoing investment into the economy throughout the construction period through job creation and workers' expenditure at local businesses.

Further information regarding the benefits of the project is available in the Needs and Benefits Report¹², and the Needs and Benefits addendum¹³.

We do hope this information helpful and further to my letter of 28th August, I would like to re-extend an offer of a meeting to discuss the proposals with you, should this be of interest.

⁷ https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-001588-6.10%20Outline%20Landscape%20and%20Biodiversity%20Strategy%20Rev002_clean.pdf

⁸ [https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-000734-6.2.15.48%20ES%20-%20Vol%202%20-%20Figure%2015.48%20Indicative%20Landscape%20Mitigation%20Plan%20Option%20B\(i\)%20\(north\).pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-000734-6.2.15.48%20ES%20-%20Vol%202%20-%20Figure%2015.48%20Indicative%20Landscape%20Mitigation%20Plan%20Option%20B(i)%20(north).pdf)

⁹ [https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-000735-6.2.15.49%20ES%20-%20Vol%202%20-%20Figure%2015.49%20Indicative%20Landscape%20Mitigation%20Plan%20Option%20B\(i\)%20\(south\).pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-000735-6.2.15.49%20ES%20-%20Vol%202%20-%20Figure%2015.49%20Indicative%20Landscape%20Mitigation%20Plan%20Option%20B(i)%20(south).pdf)
¹⁰ [https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-001480-7.7.8%20Indicative%20Landscape%20Mitigation%20Plan%20Option%20B\(ii\)%20WQ%20CA1.3.7.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-001480-7.7.8%20Indicative%20Landscape%20Mitigation%20Plan%20Option%20B(ii)%20WQ%20CA1.3.7.pdf)

¹¹ https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-001586-6.9%20Onshore%20Outline%20Construction%20Environmental%20Management%20Plan%20Rev002_clean.pdf

¹² <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-000568-5.6%20Needs%20and%20Benefits%20Report.pdf>

¹³ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-001635-7.7.7%20Needs%20and%20Benefits%20Addendum%20WQ%20MG1.1.27.pdf>



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If you have any further questions or would like to get in touch with the project team, then please do not hesitate to do so via **01962 893869** or email **aquindconsultation@becg.com**.

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

Yours sincerely,

James Wood – AQUIND Community Engagement Team