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Mr Stephen Morgan MP  
House of Commons  
London  
SW1A 0AA

16 November 2020

### **AQUIND Interconnector**

Dear Mr Morgan,

Further to your recent representation to the Planning Inspectorate dated 4<sup>th</sup> October 2020, I wanted to write to provide clarity on some of the matters you have drawn attention to.

With regard to the consultation undertaken by AQUIND with local residents, key stakeholders, local businesses and community groups, you may be aware that AQUIND undertook an initial round of public consultation in relation to the initial proposals for AQUIND Interconnector between January and February 2018 over an 8-week period. A further round of statutory consultation, pursuant to the requirements of the Planning Act 2008, was subsequently undertaken in relation to the then more advanced proposals for AQUIND Interconnector between February and April 2019 over an eight-and-a-half week period.

A full summary of the pre-application consultation undertaken by AQUIND is available view in the Consultation Report<sup>1</sup> submitted in support of the Development Consent Order (DCO) application. It should be noted that the Planning Inspectorate (PINS), in accepting the application for Examination on behalf of the Secretary of State, has confirmed that AQUIND met the necessary requirements for pre-application consultation.

Following the submission of the application, AQUIND has continued its engagement with key stakeholders and maintained an open line of communication with the local community, through the provision of a project website, freephone information line, email address and freepost address, the details of which you will find at the top of this letter. At key milestones, AQUIND has also taken steps to update interested parties and key stakeholders on its proposals, including via a Community Update Newsletter issued on 10 January 2020, as well as subsequent updates via the project website.

In your letter you draw attention to a perceived "*inconsistency in plans*", with specific reference made to recent amendments to the Land Plans relating to Eastney and Milton Allotments.

The Project's cables are to be installed under the allotments and Milton Locks Nature Reserve via a process known as Horizontal Directional Drilling (HDD), which will take place between the car park located west of the Thatched House Pub and the grassed area east of Kingsley Road. This approach

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



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allows the cables to be installed deep underground with no impact at surface level. To allow for inspections during construction and operation, AQUIND is seeking pedestrian access rights over some existing paths and internal roads of the allotments site but not over any of the allotment plots.

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

Upon our review, and before any concerns were raised in public by senior representatives of Portsmouth City Council, it was recognised that the plans submitted did not correctly show the area over which access may be required, and as a result, AQUIND took steps to remove, from the Land Plans, any areas for access that covered the actual allotment plots. This clarification was communicated to Portsmouth City Council at a teleconference on 28th September 2020, in advance of the submission of this information at Deadline 1 of the Examination. It was disappointing to see that following this teleconference, after confirming the position and corrections to be made, senior representatives of the Council raised this matter publicly in a manner which has caused considerable and unnecessary anxiety amongst the allotment plot holders and the community in Portsmouth more generally.

To ameliorate the situation, we have recently been in direct contact with the Eastney and Milton Allotment Holders Association to clarify the above points and are committed to engaging with representatives of the Allotment Holders Associations, and other stakeholders, throughout the Examination process. You will find a copy of the correspondence issued to the Chairman of the Allotment Holders Association attached for your information.

During the period of pause for the progression of the Examination of the DCO application as a result of the COVID-19 pandemic, AQUIND has continued in its efforts to engage with stakeholders and to take into account new information where available. In doing so, a focus has been on considering the options included for the cable corridor and ensuring that the potential temporary impacts associated with the installation of the underground cables are minimised.

As part of the ongoing Examination of the DCO application, AQUIND has recently submitted updated Land Plans which include a number of amendments to the cable corridor, including those described above in relation to Eastney and Milton Allotments. Save for in one limited instance where land has been added to the Order limits to accommodate the removal of an alternative cable route option, the Order Limits, and consequently the land potentially affected, has been reduced.

A clear summary of how the Order Limits have been reduced following the submission of the DCO application has been made available on the project website for the benefit of the local community at: <https://aquindconsultation.co.uk/dco-news-update/> and I attach/enclose a copy of this update for your information.



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You mentioned that there was “no clear rationale for development” of AQUIND Interconnector. In this regard we highlight that there is an urgent need for new electricity infrastructure and the need to ensure energy security, affordability, carbon emissions reductions, replacement of fossil fuel energy generating capacity, support of increased supply from renewables and cater for future increases in electricity demand. Electricity interconnectors are a key part of this by facilitating the integration of renewable generation sources, as well as playing an important role in making electricity more affordable and enhancing security of electricity supply.

Further, in light of the current Covid-19 pandemic, there is an even greater need to support the UK economy to prevent and/or mitigate potential effects of an economic recession. Infrastructure investment can contribute to the recovery process by stimulating the creation of jobs and spending. AQUIND Interconnector is a particular example of a large scale infrastructure project that is ready to start construction as soon as 2021, and would deliver this stimulus without any direct UK Government investment. AQUIND Interconnector therefore could be one of the key pillars of post Covid-19 recovery process in the UK whilst also being an integral part of the green recovery agenda on the path towards net zero.

AQUIND Interconnector would deliver substantial socio-economic and environmental benefits on a national scale by delivering energy security, integrating of renewable energy sources, providing consumer benefits and contributing to major investment into UK infrastructure. The project will also deliver local and regional benefits through employment generation, spending and business rate generation.

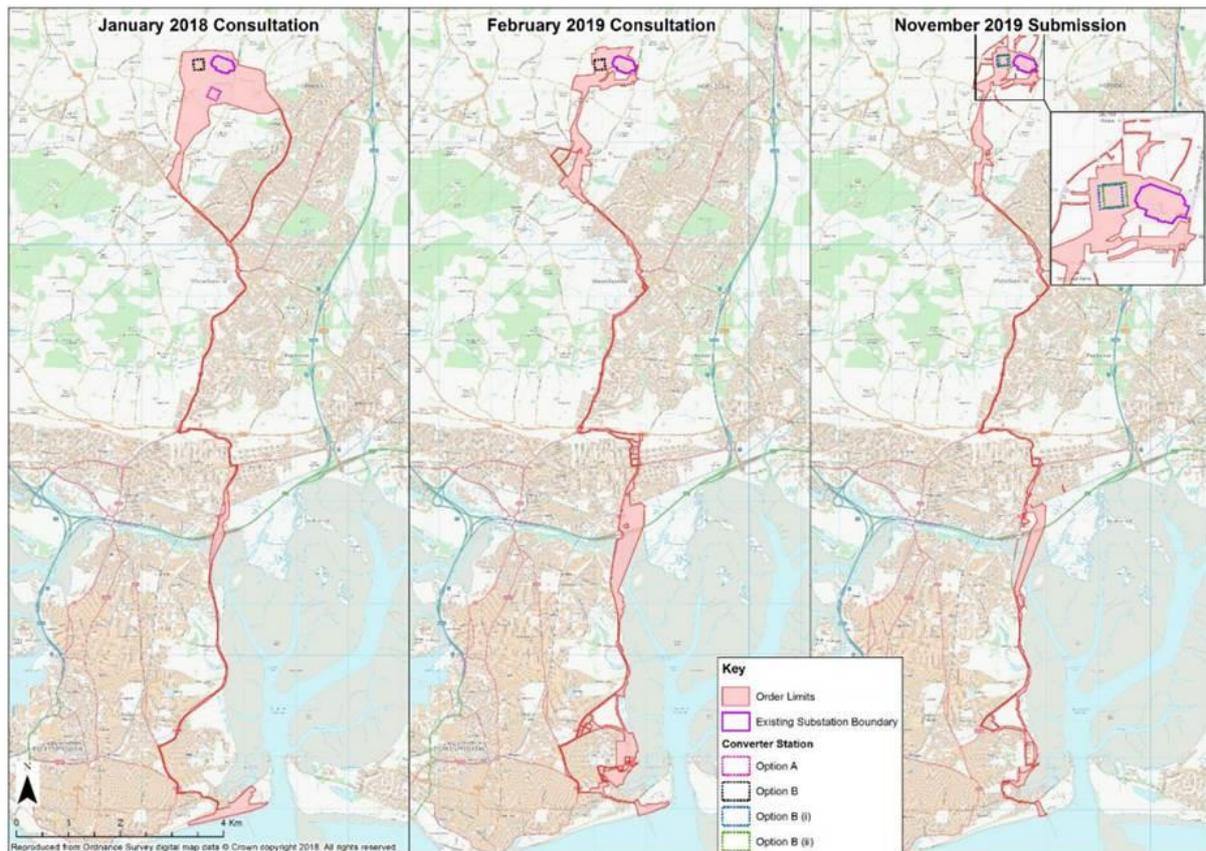
In your next point you refer to “*unnecessary disruption to the city*” and the effects of the project in terms of noise, congestion and traffic.

The cable corridor for AQUIND Interconnector was first presented to the local community via a public consultation in early 2018. The feedback received from local residents, businesses and other stakeholders was used to refine the cable corridor as presented during a further round of consultation in early 2019, after which the cable corridor was further refined having regard to feedback received before the submission of the application (November 2019). With regard to the refinements made to the cable corridor after each round of consultation, and in relation to the latest reduction, AQUIND gave particular consideration to feedback received relating to the temporary impact on highways and traffic flows.

Following feedback received during the statutory consultation between 27 February – 29 April 2019, and before submitting an application for a DCO to build and operate AQUIND Interconnector, many of the more sensitive locations of the cable corridor were either significantly reduced or removed altogether. In Portsmouth, for example, areas of Bransbury Road, Milton Road, Velder Avenue and Eastern Road were removed from the cable corridor following feedback from the local community, local authorities and other stakeholders.

Such changes can evidently be seen on the enclosed map, which compares the initial 2018 cable route to the current proposals that are before the Examining Authority as part of the Examination.

Please note that since the submission of the Application in November 2019 changes have been proposed to reduce the Order limits, including areas of highway in the administrative boundary of Portsmouth City Council, in response to further feedback received. The Order limits as proposed in the recent submission to the ExA can be seen on the updated Site Location<sup>2</sup>.



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

In addition, a Framework Traffic Management Strategy<sup>3</sup> (FTMS) 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 the

<sup>2</sup> <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-001510-2.1%20Site%20Location%20Plan%20Rev02.pdf>.

<sup>3</sup> [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](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)

impact. Such mitigation includes overnight working in specific areas, including along sections of Eastern Road, to minimise the duration of the installation period and in turn the period of disruption in this area.

You raised concerns about the impact on transport, businesses and local residents due the proposals. We can confirm that measures will be taken to limit access disruption, but during the construction period some residential and business properties will experience temporary restrictions to vehicular access, including driveway access. Pedestrian and bicycle access will be maintained at all times, as will access for those using wheelchairs, mobility scooters and pushchairs. Generally, business and residential parking will only be impacted when construction is occurring in that immediate vicinity. It is expected that highway works will progress, on average, at a rate of 100m per week. As such, the majority of residential accesses and businesses with on-street parking are likely to only be impacted for approximately one - two weeks per circuit within the construction phase. Taking into account 100m working section and typical parking bay sizes, it can be assumed that this will be equivalent to a loss of up to 22 spaces at any one given time of on-street parking, and considerably fewer properties (5-10) where only driveway access is impacted.

On the matter of noise, AQUIND recognises the importance of minimising noise impacts arising from the construction of the proposals and the sensitivities of the immediate vicinity to any such impacts.

In regard to your concern about the potential disruption to wildlife in the Portsmouth area, in particular around Milton Common, the Onshore Ecology chapter of the Environmental Statement<sup>4</sup> (ES) sets out the likely effects and proposed mitigation in relation to onshore ecology, as well as detail of all surveys undertaken. A Non-technical Summary<sup>5</sup> of the ES is also available, which provides an overview of the likely impacts and effects. Further detail regarding the relevant European sites can be found within the Habitats Regulations Assessment Report.<sup>6</sup>

Please be assured that mitigation has been embedded within the design of the Proposed Development and therefore inherent to the development for which consent is sought (as controlled by the parameters approach set out in ES Chapter 4: Methodology). This includes, for example, using the deep drilling technique known as Horizontal Directional Drilling ('HDD') between Kendall's Wharf and Farlington beneath Langstone Harbour, beneath the Eastney and Milton Allotments and Milton Locks Nature Reserve, and beneath Denmead Meadows, to avoid the loss of and impacts on these habitats. The predicted impacts of the Proposed Development are assessed with these measures already in place and the measures are set out prior to the assessment in each technical chapter (Chapters 6 – 28).

With regards to your comments in relation to Great Crested Newts, surveys have been undertaken identifying waterbodies providing potentially suitable great crested newt breeding habitat within 250 m of the Proposed Development (the 'Survey Area'). It is important to note that the 2019 great crested newt presence/absence surveys did not identify evidence of great crested newts using ponds within this proximity. While great crested newts may be present within the wider local area, they are not likely to

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<sup>4</sup> <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-000584-6.1.16%20ES%20-%20Vol%201%20-%20Chapter%2016%20Onshore%20Ecology.pdf>

<sup>5</sup> [https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-001578-6.4%20ES%20-%20Vol%204%20-%20Non-Technical%20Summary%20Rev002\\_clean.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-001578-6.4%20ES%20-%20Vol%204%20-%20Non-Technical%20Summary%20Rev002_clean.pdf)

<sup>6</sup> [https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-001580-6.8.1%20HRA%20-%20Vol%201%20-%20Habitats%20Regulations%20Assessment%20Report%20Main%20Text%20Rev002\\_clean.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-001580-6.8.1%20HRA%20-%20Vol%201%20-%20Habitats%20Regulations%20Assessment%20Report%20Main%20Text%20Rev002_clean.pdf)

occur within habitats that may be impacted by the Proposed Development. As a result, this species does not present a constraint to the Proposed Development.

We also undertook several surveys to inform the assessment of impacts on Breeding and Wintering Birds. Forty-five species of bird were identified during the intertidal survey, and the observations collected over the six visits determined each birds' activity in the surrounding area. Chichester and Langstone Harbour SPA is an internationally important site for wintering waterfowl and waders because of its mudflat habitat. These mudflats are used by birds both during low tide, mainly for foraging, with fewer birds using this area at high tide, with birds present at this tide phase mainly resting on the water. The Site is visited by a high number of species of conservation concern, in most cases due to a recent declining trend in their numbers, as in the case of northern lapwing. However, the installation of the Onshore Cable Corridor will not disturb this wintering species as appropriate mitigation measures, including controls on when works can and cannot be carried out in proximity to sites which are used for foraging by wintering birds, have been provided for and will be required to be adhered to.

There were forty records of water vole recorded within the Study Area (Appendix 16.2 (PEA/Phase 1 Habitat Survey Report)). The most recent record was reported in 2012 and are all from Farlington Marshes from the north and south of the A27. Desk study and field surveys showed there was no suitable habitat within or adjacent to the Proposed Development for water voles, and therefore they have been appropriately scoped out of the assessment. Suitable aquatic habitat and supporting terrestrial habitat is not present within the Order limits.

Further information on particular species such as, Great Crested Newts, can be found in the Technical Appendices (Volume 3 of the ES in Appendix 16.9 - Great Crested Newt Survey Report) which is attached here for reference.<sup>7</sup> Also, Further detail regarding Breeding Birds can be found within Volume 3 of the ES in Appendix 16.12 – Breeding Bird Survey Report<sup>8</sup> and Wintering Birds can be found within Volume 3 of the ES in Appendix 16.13 – Wintering Bird Survey Report<sup>9</sup>.

With regard to potential alternative locations, the location of the Converter Station is a factor in determining the location of the landfall and the onshore cable route, Lovedean substation was identified as the preferred connection location for AQUIND Interconnector following the assessment of the reasonable alternative connection locations by AQUIND. This process has taken into account assessments undertaken by National Grid, who have an obligation to develop and maintain an efficient, coordinated and economical electricity transmission network. The assessment undertaken by National Grid considers factors such as National Grid's knowledge of the existing network (including agreed future connections), agreed cost information, environmental considerations and

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<sup>7</sup> <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-000871-6.3.16.9%20ES%20-%20Vol%203%20-%20Appendix%2016.9%20Great%20Crested%20Newt%20Survey%20Report.pdf>

<sup>8</sup> <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-000874-6.3.16.12%20ES%20-%20Vol%203%20-%20Appendix%2016.12%20Breeding%20Bird%20Survey%20Report.pdf>

<sup>9</sup> <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-000875-6.3.16.13%20ES%20-%20Vol%203%20-%20Appendix%2016.13%20Wintering%20Bird%20Survey%20Report.pdf>

other constraints associated with the Proposed Development, alongside input from AQUIND on the details of the assets to be connected.

Concurrently, with the search for a suitable Converter Station site, AQUIND also undertook an assessment of all possible landfall locations. 29 potential landfall sites were identified across the South Coast of England, bounded by West Bay, Dorset in the southwest and Bognor Regis, West Sussex in the southeast. As a result of further investigative works, and confirmation of Lovedean as the grid connection point, this list was narrowed to three locations – Eastney, East Wittering and Hayling Island.

When subject to further studies it was determined that Hayling Island was not appropriate landfall location, as no cable routes from the landfall site would be technically feasible since it was not possible to identify a suitable crossing from Hayling Island to the mainland. Multiple alternative options were considered to utilise Langstone Harbour and Hayling Island to route the submarine cables onto the mainland, however those options were not feasible from an engineering perspective and would have prevented the development from coming forward, carried too high a level of risk in various aspects, and/or were considered likely to result in significant and adverse impacts to the surrounding sensitive and heavily designated environment that would not be capable of being adequately mitigated.

Both Eastney and East Wittering were identified as being deliverable as landfall locations from a cable installation perspective, with neither resulting in significantly different environmental effects. Following the undertaking of studies in relation to the onshore cable corridors to Lovedean from both, it was determined that a cable route from East Wittering to Lovedean was not preferred. The reasons for this, including how the chosen route from Eastney and the route from East Wittering were considered against one another, are clearly explained at section 7 to the Supplementary Alternatives Chapter included as part of the ES Addendum<sup>10</sup>.

With regard to the alternative cable route running through the open countryside to the west of Purbrook that you mentioned in your Written Questions in Parliament recently, I can confirm this route 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)<sup>11</sup> and

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<sup>10</sup> <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-001488-7.8.1.3%20ES%20Addendum%20-%20Appendix%203%20Supplementary%20Alternatives%20Chapter.pdf>

<sup>11</sup> <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-000570-6.1.2%20ES%20-%20Vol%201%20-%20Chapter%202%20Consideration%20of%20Alternatives.pdf>



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section 8 of the Supplementary Alternatives Chapter included as part of the ES Addendum<sup>12</sup>, 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 your letter, you also reference the benefits that the scheme would bring to the city of Portsmouth. We would like to take this opportunity to re-iterate some of the significant benefits AQUIND Interconnector will bring, including providing households in the South East of England with savings on their electricity bills.

Moreover, the project will result in the net reduction of CO<sub>2</sub> emissions by at least 1.5 million tonnes over the lifetime of the project, in addition to creating around 500 jobs through the UK onshore and marine construction phases. It is also expected that the interconnectors will play a major role in achieving the Net Zero 2050 targets as the Government formulates strategies of achieving those targets. Information on the need for and benefits of AQUIND Interconnector is available in the Needs and Benefits Report<sup>13</sup> and the Needs and Benefits Addendum.<sup>14</sup>

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

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](mailto: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**

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<sup>12</sup> <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-001488-7.8.1.3%20ES%20Addendum%20->

<sup>13</sup> <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-000568-5.6%20Needs%20and%20Benefits%20Report.pdf>

<sup>14</sup> <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>