



AQUIND Limited

AQUIND INTERCONNECTOR

Applicant's Response to Non-Interested
Parties' Deadline 8 Submissions

The Planning Act 2008 Infrastructure Planning (Examination Procedure)

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1. INTRODUCTION

- 1.1.1.1. The following tables set out the Applicant's responses to Non-Interested Parties' submissions to the Examining Authority (ExA) made at Deadline 8 and published by the ExA on 4 March 2021.
- 1.1.1.2. The Applicant does not seek to respond to all the points made where the Applicant's response is already contained within other submissions made since the Application was accepted, save where it is thought helpful to repeat or cross refer to the information contained in the previous documentation.
- 1.1.1.3. The responses have focused on issues thought to be of most assistance to the ExA.

2. SUBMISSIONS TO DEADLINE 8 FROM NON-INTERESTED PARTIES

Table 2.1 – Martin Grice

Ref:	Question:	Applicant's Comments
	Given the previous [redacted] within the U.K. by [redacted], why are the U.K. proposing to accept a business entity unrestricted unmonitored fibre connection to the UK's backbone communications network?	This is not a matter for the DCO process. Telecommunication security is a matter for Ofcom which it is anticipated will soon have new powers under the Telecommunications (Security) Act when enacted.
	Can the planning inspectorate assure the public, (backed by assurance from BT Openreach the custodian of the UK's backbone network) that the proposed inclusion of [redacted] fibre cable into the Portsmouth Interconnector project will be secure, monitored and will not represent a significant threat to the UK's national security?	This is not a matter for the DCO process. Telecommunications security is a matter for Ofcom.

Table 2.2 – Ludmila Haskins

Ref:	Question:	Applicant's Comments
	I received my allotment in 2015 y. And I would like to keep my allotment .I have a lot of Joy to be on the my plot and observe all the animals in the area like (foxes, frogs, hedgehogs, bird sand insects). I also spent a lot of money on shed, fence, soil, fruit trees, flowers, seeds and plot work equipment.	The Applicant can advise that the cable is to be installed beneath the allotments by Horizontal Directional Drilling (HDD), with no effect on the surface of the land during construction. HDD drilling allows the cable to be constructed without it coming into contact with, or affecting, wildlife habitats or soils. The depth at which the cable is to be drilled places it well below vegetation and the soil in which it grows, and as a consequence also below the habitats used by animals. The use of HDD at the allotments will separate the construction of the cable from wildlife habitats and soils there, avoiding effects on these features.
	Such green areas as plots should not be disturbed or damaged in any way. These areas provide shelter and living space for a large number of animals. For example - slow worms are protected by law and there are many on the plots.	See comment above. The allotments will be avoided through the use of HDD. This provides effective mitigation for ecological features.
	I strongly oppose Aquind's plans !! Could you ,send my correspondence by postal address, please. My address : [redacted] I can get the book of reference number, please.	The Applicant submitted an updated version of the Book of Reference at Deadline 8 (REP8-010). The relevant Plots for Eastney and Milton Allotments as listed within the Book of Reference are 10-12, 10-13, 10-14, 10-14a and 10-14b.

Table 2.3 – Christine Elmer

Ref:	Question:	Applicant's Comments
	I object to the lack of clarity as well as the overly complicated and everchanging information from Aquind. My personal example linked to these	The cables are to be installed beneath the Milton Piece Allotments by horizontal directional drill (HDD), as presented during the 2019 meeting, to avoid disturbance to users and the ground surface, the HDD

Ref:	Question:	Applicant's Comments
	<p>issues is as an allotment holder on the Milton site. In 2019 I attended a meeting when two representatives from the company explained to allotment holders exactly how the drilling would be carried out, emphasising that we should not be affected apart from the slight chance that drilling material might rise to the surface in a few places. So, it was a complete shock to read something from a local councillor last Wednesday informing us that a whole section of allotments, including mine, could be severely impacted. This could involve the demolition of plot holders' buildings, sheds, greenhouses, as well as the community allotment and association shop. I believe this illustrates that Aquind have definitely not been truthful or transparent in setting out their plans.</p>	<p>bore will be approximately 12 metres below ground level apart from where it enters and exits which is outside of the allotments. The likelihood of disturbance at surface is considered very low due to the management and mitigations measures which will be followed by the Principal Contractor, these measures are set out in 7.4.3.4. ExQ2 Appendix 4 -Bentonite Breakout Note (REP7-043). No demolition of any allotment structures or buildings will occur and it is regrettable that apparently false information has been circulated locally.</p>
	<p>I object because of the disruption this will cause to a city that is second only to London in density of population. I particularly object because I understand that there are possible alternative routes by which the cables would travel through far more sparsely populated areas. The Portsea Island area of the city (making up the majority) only has three points of access and therefore traffic on these roads is often congested and , on occasions, gridlocked. The idea of a scheme that will reduce capacity on one of these roads for a long period is poorly thought-out. I assume that nobody involved in compiling this application has needed to use this road during a busy period.</p>	<p>The Proposed Development is the product of an extensive optioneering process. The ES sets out the alternatives considered by the Applicant and the reasons why the Proposed Development was chosen (see ES Chapter 2 Consideration of Alternatives (APP-117) and Supplementary Alternatives Chapter (REP1-152)).</p> <p>The Applicant has assessed the impacts associated with construction of the Onshore Cable Route and concluded 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 updated Framework Traffic Management Strategy (AS-072), updated Travel Demand Management Strategy (REP8-055) and updated Framework Construction Traffic Management Plan (AS-074).</p>
	<p>I object because of the resulting environmental damage and linked to this the effect on the health. Again, I will use the example of the Milton Allotments. I have had my allotment for a number of years since retiring and during this time it has provided, not just a place to grow my own food but also a lifeline and a sanctuary especially this year during the Covid crisis. I have spent a huge amount of time planting trees, fruit bushes and vegetables. I have a greenhouse, a shed, raised beds and paths. If these are destroyed, I will be devastated especially at my time of life. We have heard nothing from Aquind on how/ if they will be offering support or compensation. Aquind's 'purple area' of allotments i.e. those likely to be demolished, is home to a diverse, multi-age, multicultural community some of us live alone; some in gardenless, cramped conditions with young families. This area also includes the community allotment which supports schools, those with special needs or mental health problems. The area is also important as it is a haven for wildlife lizards, slowworms, bees, butterflies and often birds of prey. The slowworms are a protected species (Wildlife and Countryside Act 1981) and I often find them on my own allotment. I believe we may also have a protected species of lizard. I feel that the way Aquind has treated this allotment community, with no consultation as to their final plans , is a total insult.</p>	<p>The Applicant can advise that the cable is to be installed beneath the allotments by HDD, with no effect on the surface of the land during construction.</p> <p>The depth at which the cable is to be drilled places it well below vegetation and the soil in which it grows, and as a consequence also below the habitats used by animals. The use of HDD at the allotments will separate the construction of the cable from wildlife habitats and soils there, avoiding effects on these features. HDD provides effective mitigation for ecological features and avoids any damage to the surface of the allotments and any buildings or structures thereon.</p>

Table 2.4 – Richard and Julie Hipkiss

Ref:	Question:	Applicant's Comments
	It will take away a vital car park that prevents grid lock on the roads around the seafront every summer.	The occupancy surveys undertaken at Fort Cumberland Car Park demonstrate a maximum occupancy of 63 vehicles in the Car Park at any one time. The occupancy surveys in question were undertaken over a bank holiday weekend in August 2020 and thus reflect a robust assessment of peak demand for the Car Park despite the current Covid-19 pandemic. Further to this, overnight parking surveys have been undertaken by the Applicant to assess the reserve capacity available in alternative parking locations local to the Car Park, for example on the nearby residential roads of Ferry Road Gibraltar Road and Lumsden Road. These have shown that there is alternative parking provision available to accommodate any displaced parking during the period of the works. On completion of the works, the car park would be resurfaced providing an more usable area for parking
	- It would destroy Allotments that are in very short supply, evidenced by over a 5 year waiting list for one.	The Applicant can advise that at the cable is to be installed by HDD beneath the allotments, with no effect on the surface of the land during construction.

Table 2.5 – Ella Lawson

Ref:	Question:	Applicant's Comments
	This project will destroy our local environment, we'll lose precious green spaces, allotments and outdoor areas. All of which are important at all times, but never more than now during this pandemic where people's only solace is a daily walk in nature. People's mental health is in grave danger at the moment, and I don't see it getting better any time soon. Have you seen the increased rate of suicides during the pandemic? An increase on an already alarming rate of suicide in UK. I'd give you some statistics, but it seems the ONS is slow to release the data for 2020.	As set out in the responses the relevant representations (REP1-060) and open floor hearings (REP6-061), the Applicant has, in the scheme design, sought to avoid greenspaces and recreational facilities wherever possible and it has made use of HDD where it can to avoid impacts e.g. Milton Locks Nature Reserve, Milton Allotments, Eastney Beach. Where possible, it has also sought to avoid playing surfaces where open space needs to be crossed. The Applicant recognises there will be some partial loss of greenspaces but this will be temporary during the construction period. Public access to greenspace and footpaths will be maintained (ES Addendum 14 Note on PRow, Long Distance Walking Paths and Cycle Route Diversions (REP8-053)).
	As the UK's most densely populated city outside of London any outdoor space is precious. My heart weeps for those in the high rises, think how many children are in there, no outdoor space, not going to school, when a walk in nature would be the best they can hope for. Reducing these spaces makes it less likely they'll get outside.	As set out above loss of greenspaces has been minimised and is temporary. Save for the working areas affected, the greenspaces will remain accessible to the public for recreation.
	It seems also that the access roads used for the build might destroy residents' forecourts and may block access to their houses entirely. I would hazard a guess that the heavy machinery could cause structural damage to properties too.	The Onshore Cable Route Construction Impacts on Access to Properties and Communication Strategy included within Appendix 1 of the FTMS (AS-072) provides details on the strategy that contractors will be required to follow during construction to maintain access to properties wherever possible. This includes the plating over the trench outside of working hours and where construction access is not required and a requirement to provide access for emergency vehicles, vulnerable and mobility impaired residents on demand and to make best endeavours to provide for access in all other circumstances. The construction works will not impact resident forecourts nor result in structural damage to forecourts or properties.

Ref:	Question:	Applicant's Comments
	<p>Another thing about being such a densely populated city is the air pollution, which will be worsened by this. Not only from the building sites themselves, but also from traffic that will be gridlocked as some roads will be effected, key roads such as Eastern and London, Farlington Ave, and I'm sure you know it doesn't take much to cause a gridlock on our islands city. We'll lose a third of the Fort Cumberland Carpark forever, a key car park for access to the beaches. There was a parking shortage last summer even with this car park in action.</p>	<p>The Applicant has assessed the impacts associated with construction of the Onshore Cable Route and concluded 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 updated Framework Traffic Management Strategy (AS-072), updated Travel Demand Management Strategy (REP8-055) and updated Framework Construction Traffic Management Plan (AS-074).</p> <p>Air quality has been comprehensively assessed in the Chapter 23 of the Environmental Statement (App-138) and Environmental Assessment 2 (REP1-033). This included assessments of construction dust, construction traffic, local power generation on construction sites, and the effects of diverted traffic..</p> <p>In relation to dust, there are a number of well-established mitigation measures that have been recommended that are accepted as reducing these effects to negligible and imperceptible levels. These measures are secured for implementation on site in Table 5.2 of the OOCEMP (REP8-024).</p> <p>The effects of emissions from construction traffic, local power generation and diverted traffic are also presented, and again the effects were generally found to be negligible in magnitude, with the majority of modelled receptors experiencing no change in concentrations.</p> <p>Further air quality investigations have been undertaken on areas of concern raised by Portsmouth City Council, and these can be found in REP1-078, REP7-072 and REP8-061. Whilst some adverse effects are predicted at specific locations, these predictions are subject to several conservative assumptions. Where possible, the Applicant has sought to mitigate the effects of these assumptions in presenting the results. The air quality effects are expected to be negligible, are highly temporary in nature, and are not judged to be an impediment to the improving air quality trend in the city.</p>
	<p>The distance of the plant to houses in Lovedean is unacceptable? A matter of a few meters away. The plant in France has had a site chosen with a large space around it due to wanting to protect people from the radiation that will be produced. Is this not a consideration for Lovedean's residents?</p>	<p>The Applicant can advise that studies were carried out to ensure that all relevant government guidelines are complied with in relation to both the converter station and HVDC cable route (see the Onshore Electric and Magnetic Field Report (APP-361). The guidelines issued by the UK government provide limits for the exposure of occupational personnel and for the general public to AC and DC electric and magnetic fields. No equipment will be installed which does not comply with the guidelines. Public Health England Confirmed that they are satisfied based on the submitted documentation and suggested control/mitigation measures, the development is unlikely to present a significant risk to public health [REP1-218]</p>
	<p>Then we have our nature reserves, Farlington Marshes and Milton Common, the endangered species and migratory birds that need our protection, the contamination on Milton Common that will be unleashed...the list goes on. I find it incredible that this is moments from being signed off. Why on earth do we need a power connection to France anyway?? I thought we wanted to be separate which is why we're going through the painful Brexit processes! Surely we can create enough power for our needs.</p>	<p>The potential impact on migratory birds is comprehensively assessed within Environmental Statement Chapter 16 (APP-131) and the Habitat Regulations Assessment Report (REP7-029). This includes consideration of all protected and functionally linked sites important for migratory birds. In response to impacts on wintering and migratory bird species, particularly brent geese, the Applicant has committed to a suite of winter working principles with respect to the construction phase. This notably includes a restriction of works in the winter period when disturbance could occur. This mitigation is agreed with Natural England and rules out adverse effects on these species. Potential impacts on Milton Common are also assessed in Chapter 16 which details mitigation for any impacts and concludes that there will be no significant effects.</p> <p>Mitigation measures will be in place in order to prevent risks from the disturbance and exposure of buried material and contaminated land at Milton Common. These mitigation measures are contained in Section 5.5 and Section 6.9.2 of the OOCEMP (REP8-024), and include the following:</p>

Ref:	Question:	Applicant's Comments
		<ul style="list-style-type: none"> • Excavation of the trench in short lengths to minimise odour and dust impacts; • The excavated waste will be carefully segregated and handled so as not to contaminate areas away from the works themselves. Excavated materials will be removed from site and disposed of or treated for reuse at a suitably licensed waste receiving facility. Full details and records of the movement of excavated soils will be presented in a Verification Report upon completion of the work; • Reinstatement of an engineered landfill cap to its existing condition or better; • Clay stanks (or similar) will be installed at regular intervals along the trench to prevent migration of landfill gas along the route and beyond the existing gas vent trench around Milton Common; • Appropriate gas protection measures will be applied to access chambers or jointing pits to prevent ingress of landfill gas; and • Should significant unexpected contamination be encountered this will be managed appropriately and reported to the EA. If required, the contamination risk assessment and remediation strategy will be updated.

Table 2.6 – First Hampshire & Dorset Limited (FirstBus)

Ref:	Question:	Applicant's Comments
	<p>Following extensive discussions, along with Hampshire County Council and Portsmouth City Council, First Hampshire & Dorset Limited are content with the proposed mitigations and funding in the associated section 106 agreement between the applicant and Hampshire County Council.</p>	<p>The Applicant notes this response and welcomes the agreement that has been reached with First Bus.</p>

