From:
To:
Aquind Interconnector

Subject: Response to invitation for comments to Third Information Request

Date: 15 December 2021 17:04:46

Dear Mr Leigh,

Application for Development Consent by AQUIND Limited ("the Applicant") for an Order granting Development Consent for the proposed AQUIND Interconnector ("the AQUIND Interconnector project")

The following is the response of East Hampshire District Council and Havant Borough Council to the invitation to Interested Parties for comments in response to the 'Applicant's Response to Third Information Request'. The comments are restricted to two aspects of the Response; the consideration of alternatives and the micro-siting of the Converter Station.

Consideration of Alternatives

At paragraph 2.6 (and referred to again at 2.17 and 2.18) (of the Applicant's Response to the Third Request for Information), the Applicant quotes a letter from NG ESO (REP7-109) regarding why Mannington Substation was not taken forward for systems analysis. In particular 2.6.1 that it would necessitate more reinforcements which would therefore lead to more environmental impact. It is acknowledged that Mannington is close to a National Nature Reserve, but it is not clear whether the environmental impacts would be more severe than the impact of setting the Converter Station adjacent to the South Downs National Park as at Lovedean.

The Applicant goes on to state that one further reason for Mannington Substation not being taken forward was that 'the shared connection point with the Navitus Bay offshore wind farm raised technical concerns (paragraph 2.7). The Navitus Bay Wind Farm was refused (in September 2015). The Applicant states it approached NGET on the 14th October 2015 'regarding the impact of that refusal on the Feasibility Study which was being undertaken and known to be near completion.' However, 'The Applicant has not been able to locate a response to this query' (paragraph 2.14). This is considered unsatisfactory and whilst the Applicant states that to undertake a Feasibility Study including a cost benefit analysis would have caused 10-12 months delay, the potential connection point should have remained an option to test further, noting that there had been a connection agreement already for the windfarm. It would seem evident that any response from either NGET or the promoters of Navitus Bay could influence the findings of the Feasibility Study report regardless of the report for Lovedean/Bramley being well advanced, rather than letting the Mannington option slip away, enquiries to NGET may have influenced the Feasibility Study and the subsequent Connection Offer issued in June 2016.

Micro-siting of the Converter Station

It is noted that at paragraph 5.2 of the Applicant's Response and the subsequent letter of 6 December 2021 confirming that the land agreements have now been entered into, "we confirm that the Applicant is able to commit to the Converter Station being located in the Option b(ii) location. With that being the case, it is confirmed that the Applicant has no objection to the Secretary of State making an Order which removes the Option b(i) location and provides for the Converter Station to be located in the Option b(ii) location."

This is welcomed since Option b(ii) is regarded as more suitable and resulting in lesser environmental harm than Option b(i). The amendments summarised at 5.4.1-5.4.6

inclusive are all acknowledged.