AQUIND Limited

AQUIND INTERCONNECTOR

Needs and Benefits Third Addendum

The Planning Act 2008

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1. INTRODUCTION

1.1.1.1. This report is the third addendum to the Needs and Benefits Report [APP-115] submitted with the DCO application, supplementing the Needs and Benefits Addendum [REP-136] submitted in October 2020 and the Second Needs and Benefits Addendum submitted in January 2021 [REP7-064].

1.1.1.2. The Examining Authority (ExA) recognised (in their report dated 8 June 2021) the demonstrable need for the AQUIND Interconnector, advising that:

> *"5.2.28. Part 3 of NPS EN-1 notes that the UK needs all types of energy infrastructure in order to achieve energy security and directs the ExA to assess an energy application on the basis that the Government has demonstrated a need for those types of infrastructure. Substantial weight should be given to the contribution that projects make towards meeting that need.*
>
> *5.2.29. The Applicant has set out a compelling case for the Proposed Development in the public interest in its Needs and Benefits Report [APP115] and its Addenda [REP1-136] and [REP7-064]. The 2GW capacity of the AQUIND Interconnector would contribute towards the desired increase in interconnection capacity expressed by the Government in the Energy White Paper and by Ofgem [APP-115].*
>
> *5.2.30. Although a number of representations (for example, [REP7-126]) suggest that the Proposed Development is not needed, it is the ExA's view, taking the totality of Government policy and guidance, that there remains a strong need for a mix of energy projects and that mix should include a greater capacity for interconnection, as confirmed as being in the region of 18GW in the Energy White Paper"* (our emphasis).

1.1.1.3. The ExA concluded that:

> *"5.2.31. There is no substantive evidence from any IPs that undermines the credibility of the Applicant's case nor that disproves the need for the Proposed Development. There are no matters that the ExA has found to be important or relevant to indicate against the applicability of the need case or the contribution the Proposed Development would make towards meeting that need.*

1.1.1.4. *5.2.32. In relation to electricity interconnection aspects, the ExA is satisfied that there is a demonstrated need for the Proposed Development in accordance with NPS EN-1"* (our emphasis). In recommending approval, the ExA found that *"overall, the need case for the Proposed Development strongly outweighs the identified disbenefits"* (paragraph 12.2.1). As noted by Mrs Justice Lieven in her judgment of 24 January 2023, the ExA had therefore *"found that the case being advanced … went beyond the simple policy presumption in terms of the benefits of the project"* (paragraph 83)[1].

1.1.1.5. Events over the following two years have only served to further strengthen the need for energy security. This is reflected in the creation of the new Department for Energy Security and Net Zero, the message in the recent Spring Budget (March 2023)[2] that *"… clean energy will be vital for both our security and net zero goals, and presents an opportunity for growth"* and in Powering up Britain (March 2023)[3] which confirms that *"energy security is one of the Government's greatest priorities…".*

1.1.1.6. This Third Addendum provides an update on new and emerging policy, publications and analysis since the last addendum in January 2021, which further highlights and supports the compelling needs case for AQUIND Interconnector. This includes:

- a summary of Government strategy emerging through 2021 emphasising the delivery of energy security (through the British Energy Security Strategy and the Net Zero Strategy: Build Back Greener), and in particular further support for the role of interconnector projects, leading to the publication of *Powering up Britain* in March 2023;
- an update in relation to national planning policy including the draft NPS EN-1 (March 2023) insofar that the draft policies may be considered important and relevant under s104 of the PA2008, and the Government's plans for infrastructure planning reforms in *Nationally Significant Infrastructure Projects (NSIP) Reforms: Action Plan (February 2023);*
- an update on the *Ten-Year Network Development Plan (TYNDP)* (2022) following the summary in the Second Needs and Benefits Addendum on the TYNDP 2020;
- the recent Statement of Cooperation on energy between the UK and French governments which recognises the central role of electricity interconnection to mutual energy security.

1.1.1.7. These updates all further support the compelling need for the project and the national scale benefits of delivering energy security, integration of renewables, contributing to significant reductions in carbon emissions[4], and reducing electricity prices.

[1] *R (on the application of AQUIND Ltd) v Secretary of State for Business, Energy & Industrial Strategy* [2023] EWHC 98 (Admin)

[2] https://www.gov.uk/government/publications/spring-budget-2023/spring-budget-2023-html

[3] Page 5 in the Introduction: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1147340/powering-up-britain-joint-overview.pdf

[4] Results of the 2019 assessment show that AQUIND Interconnector is estimated to lead to a net reduction in emissions of approximately 1.53mtCO2e over its designed operational lifespan - Environmental Statement - Volume 1 - Chapter 28 Carbon and Climate Change [APP-143]. Latest TYNDP 2022 results show that reduction in CO2 emissions due to the Project will be significantly higher.

2. POLICY AND EVIDENCE UPDATE

2.1. INTRODUCTION

2.1.1.1. The Needs and Benefits Report [APP-115] provided a summary of key policy, guidance and analysis providing support for the delivery of electricity infrastructure and specifically interconnector projects. This included:

- Planning our Electric Future (2011)
- National Policy Statement EN-1 (2011)
- More Interconnection: Improving Energy Security and Lowering Bills (2013)
- Getting More Connection (2014)
- Smart Power (2016)
- 2016 Spring Statement
- National Infrastructure Delivery Plan (2016)
- Overseas Electricity Interconnection (2018)
- 2018 National Infrastructure Assessment (2018)
- Future Energy Scenarios (2019)
- National Energy and Climate Plan (2019)

2.1.1.2. The Needs and Benefits Addendum [REP-136] provided a review of additional analysis and publications in 2020 which provided further support for the role of interconnectors and highlighted the implications of the Covid-19 pandemic on global energy infrastructure investment, including:

- Network Options Assessment (NOA) 2019/20 (January 2020)
- Ofgem Decarbonisation Programme Action Plan (February 2020)
- National Infrastructure Commission's 2020 AMR (February 2020)
- Budget 2020 (March 2020)
- Global Energy Review 2020 (April 2020)
- World Energy Investment (May 2020)
- Future Energy Scenarios (FES) (July 2020)

2.1.1.3. The Second Needs and Benefits Addendum [REP-064] provided a further update in relation to further important publications later in 2020, including:

- The Energy White Paper: Powering our Net Zero Future (December 2020)
- The Impact of Interconnectors on Decarbonisation (October 2020)
- Ten Year Network Development Plan (November 2020)
- The Ten Point Plan for a Green Industrial Revolution (November 2020)
- Government Response to the National Infrastructure Assessment (November 2020)
- National Infrastructure Strategy (November 2020)

2.1.1.4. The following sections provide a review of further strategy, policy and statements since December 2020 which are relevant to the project and further highlight the urgent national need for electricity infrastructure and the overwhelmingly compelling case for increased interconnector capacity as part of the solution. These include:

- Transitioning to a net zero energy system – smart systems and flexibility plan (July 2021)
- Net Zero Strategy: Build back greener (October 2021)
- British Energy Security Strategy (April 2022)
- Spring Budget (March 2023)
- Integrated Review Refresh 2023: Responding to a more contested and volatile world (March 2023)
- Powering up Britain (March 2023)
- Powering up Britain: Energy Security Plan (March 2023)
- Powering up Britain: Net Zero Growth Plan (March 2023)
- Nationally Significant Infrastructure Projects (NSIP) Reforms: Action Plan (February 2023)
- Draft Overarching National Policy Statement for Energy (EN-1) (March 2023)
- ESO Interconnector Report (August 2022)
- Ten Year Networks Development Plan 2022
- Statement of Cooperation on energy between UK and French Governments (March 2023)

2.2. TRANSITIONING TO A NET ZERO ENERGY SYSTEM - SMART SYSTEMS AND FLEXIBILITY PLAN (JULY 2021)

2.2.1.1. In July 2021 the Government and Ofgem jointly published the Smart Systems and Flexibility Plan to set out a vision for delivering a smart and flexible electricity system to underpin energy security and the transition to net zero.

2.2.1.2. The Smart Systems and Energy Plan makes clear that *"the government and Ofgem will look to increase the level of GB interconnector capacity"* and references the target for at least 18GW of interconnector capacity by 2030 stated in the Energy White Paper.

2.2.1.3. The benefits of interconnectors have been widely recognised in the various sources reviewed and referred to in the Needs and Benefits Report and previous Addenda. The Smart Systems and Energy Plan provides a useful case study (page 48) to put this into practical context, using the example of the IFA2 interconnector:

> *"In January 2021, the GB energy system experienced extremely cold weather coupled with a reduction in electricity generation from windfarms. As a result, there was a lower-than expected supply of electricity to meet high demand.*
>
> *The Electricity System Operator (ESO) subsequently issued several alerts to notify the market about the conditions, which resulted in the highest ever prices in the GB wholesale electricity market.*
>
> *At the same time IFA2, a new 1GW interconnector between GB and France, was in its final commissioning phase. As part of the commissioning process, IFA2 was importing power into GB in the morning and afternoon of 13 January 2021. As a result of the market conditions, the ESO asked IFA2 to continue to import power from France at full capacity throughout the evening peak period. The additional electricity supplies from France significantly relieved the GB system tightness and reduced the cost of operating the electricity system that evening – a cost saving that ultimately flows through to GB consumers.*
>
> *Interconnectors like IFA2 offer system operators a dynamic and flexible tool to react quickly to changes in market conditions in the countries they connect, which helps integrate renewable electricity, mitigates potential wholesale price increases and strengthens security of supply"* (our emphasis).

2.2.1.4. In addition to addressing domestic energy security the Smart Systems and Energy Plan also highlights (page 41) that "*further deployment of interconnection will help to position Great Britain as a potential future net exporter of green energy*".

2.2.1.5. The plan addresses the need to remove barriers to flexibility to support increased levels of interconnection capacity and to "*ensure that the benefits of interconnectors can be realised, and restrictions to interconnector capacity are kept to a minimum"* and notes the need to ensure that providers of flexibility, including electricity interconnectors, are fully rewarded for the value that they provide to the system (page 52).

2.3. NET ZERO STRATEGY: BUILD BACK GREENER (OCTOBER 2021)

2.3.1.1. The Government's October 2021 Net Zero Strategy also specifically recognised the role of interconnectors to complement new generation through wind and solar, stating that "…*to ensure the system is reliable, intermittent renewables need to be complemented by known technologies such as nuclear and power CCUS, and flexible technologies such as interconnectors, electricity storage, and demand-side response. These flexible technologies can help to minimise the amount of generation and network capacity needed to meet our demand needs…"* (our emphasis) (paragraph 11). This need for flexibility is also reflected at paragraph 43 on page 105 in relation to reducing delivery risk of deployment of low carbon generation technologies.

2.3.1.2. The economic benefits of flexibility are further recognised at paragraph 25 of page 100, which notes that "*flexibility from technologies such as energy storage, smart and bidirectional charging of electric vehicles, flexible heating systems, and interconnection could save up to £10 billion per year by 2050 by reducing the amount of generation and network needed to decarbonise*".

2.4. BRITISH ENERGY SECURITY STRATEGY (APRIL 2022)

2.4.1.1. The British Energy Security Strategy, published by the Government in April 2022, also recognises the importance of 'hyper-flexibility' in matching supply and demand so that minimal energy is wasted, and refers to the potential to bring down costs by up to £10bn a year by 2050 as introduced in the Net Zero Strategy.

2.4.1.2. The Strategy also highlights the need to work with international partners to maintain stable energy markets and prices to help protect UK consumers and reduce use of fossil fuels and identifies the UK is "*driving our work with European partners for more efficient trading across our electricity interconnectors, lowering costs for UK and EU consumers"* (page 27).

2.5. SPRING BUDGET (MARCH 2023)

2.5.1.1. The Spring Budget 2023 continued the theme, highlighting the need for energy security and that *"clean energy will be vital for both our security and net zero goals, and presents an opportunity for growth"* (para 3.84) and advised that the government would set out further action to ensure energy security in the UK and meet net zero commitments.

2.6. POWERING UP BRITAIN (MARCH 2023)

2.6.1.1. This further action is set out in Powering up Britain released by the Department for Energy Security and Net Zero on 30 March 2023 which sets out the 'blueprint for the future of energy' in the UK. It was published alongside the Energy Security Plan, which set out steps the Government is taking to ensure the UK is more energy independent, secure and resilient, and the Net Zero Growth Plan which focuses on the country's long-term decarbonisation trajectory.

2.6.1.2. The introduction to the Energy Security Plan notes that government will build on the ambitions in the British Energy Security Strategy and Net Zero Strategy to reduce demand and increase share of domestic energy production (aiming to double Britain's electricity generation capacity by the late 2030s). The Energy Security Plan is clear, however, that "*this is not the same as energy isolationism*" and that *"Britain needs and benefits from importing energy, now and in the future. Our own energy production is also key to our export strategy so that we can work with our friends and allies in securing a flexible and resilient market, even as we export these fuels to our neighbours. Where we need to import energy, we will ensure this is built on relationships with strong, trusted partners and diversified sources of supply"* (page 2).

2.6.1.3. The Energy Security Plan notes the strengths in the electricity system which support security of supply, including the role of international interconnectors: "…*we benefit from a diverse electricity mix, including interconnection to other countries that can make a valuable contribution to security of electricity supply, offering mutual support"* (page 11).

2.6.1.4. In the section on 'Power Networks, Interconnection and System Governance', the Energy Security Plan reiterates the commitment to increase interconnection capacity aiming for at least 18GW by 2030 introduced in the Energy White Paper. It continues to note that in order to meet the challenge of the anticipated doubling of demand for electricity by 2050 "*it is crucial that we ensure we have the right electricity network infrastructure, governance arrangements of the system, and interconnection with European neighbours"* (page 45).

2.6.1.5. This is expanded on in a subsection titled ‘Optimising our electricity interconnection with neighbours’, which notes that “*power cables that link our electricity network to those of neighbouring countries – known as interconnectors – provide an important source of resilience and efficiency in our power systems. They allow us to import power at times of low renewable energy output and to export excess green power at times of high renewable energy output, enabling us to keep British wind turbines spinning even once British demand has been met”* (page 50).

2.6.1.6. Powering up Britain also emphasises the need to speed up the planning and delivery of development projects, with reference to the Nationally Significant Infrastructure Project (NSIP) Action Plan and consultation on revised energy NPSs (both addressed further below).

2.7. NATIONALLY SIGNIFICANT INFRASTRUCTURE PROJECTS (NSIP) REFORMS: ACTION PLAN (FEBRUARY 2023)

2.7.1.1. The Ministerial foreword to the Action Plan highlights that *“improving energy security, achieving net zero and delivering the transport connectivity, water and waste management facilities this country needs demands investment in infrastructure”* and that it is necessary to have a planning system fit to deliver it, noting the need for faster and more robust decision making to deliver the growing pipeline of critical infrastructure projects.

2.7.1.2. The Action Plan addresses National Policy Statements (NPS), and sets as the first of five ‘reform areas’ the setting of a clear strategic direction, where NPSs and wider government policy “*reduce the policy ambiguity faced by individual projects”*. This is also reflected in relation to need, at paragraph 2.1, which notes that NPSs “*are a cornerstone of the NSIP regime, setting out the need for infrastructure in advance and removing this debate from the consideration of individual applications”.*

2.7.1.3. The Action Plan noted that a review of the energy NPSs is underway and anticipates designation of the updated NPS EN-1 by Q2 2023.

2.8. DRAFT OVERARCHING NATIONAL POLICY STATEMENT FOR ENERGY (EN-1) (MARCH 2023)

2.8.1.1. The Energy White Paper announced that government would complete a review of the existing energy NPSs to reflect the policies and broader strategic approach set out in the white paper and ensure that the government continues to have a planning policy framework which can support the infrastructure required for the transition to net zero. It confirmed that until that review was undertaken (at that time the stated aim was for these to be designated by the end of 2021) the current suite of NPSs remain relevant government policy, have effect for the purposes of the Planning Act 2008 and form the basis for decisions on applications for development consent. This was based on the findings in the Energy White Paper that the need for energy infrastructure set out in the existing NPS remains (other than for coal fired generation).

2.8.1.2. A draft EN-1 was published for consultation in September 2021 and the Government published a response in March 2023 (*Planning for New Energy Infrastructure: government response to consultation on draft National Policy Statements for energy infrastructure*) alongside a further revised draft EN-1 for consultation until 25 May 2023.

2.8.1.3. As confirmed in the transitional provisions at section 1.6 of the draft NPS for any applications accepted for examination before the 2023 amendments the 2011 NPS should have effect (para 1.6.2) but that any emerging draft NPS (or those designated but not having effect) are potentially capable of being important and relevant considerations in the decision making process (para 1.6.3).

2.8.1.4. This is addressed more broadly in the Planning Statement Addendum, but in relation to the need for the project, the revised draft EN-1 (March 2023):

- highlights that meeting the objectives of a secure, reliable, affordable and net zero consistent energy system will require a significant amount of energy infrastructure (para 2.3.4);
- notes that demand for electricity will significantly increase, advising that "*using electrification to reduce emissions in large parts of transport, heating and industry could lead to more than half of final energy demand being met by electricity in 2050, up from 17 per cent in 2019, representing a doubling in demand for electricity*" (para 2.3.7);
- identifies that several different types of electricity infrastructure will be needed to deliver energy objectives and *"… additional generating plants, electricity storage, interconnectors and electricity networks all have a role, but none of them will enable us to meet these objectives in isolation*" (para 3.3.4);

- explains that "*new generating plants can deliver a low carbon and reliable system, but we need the increased flexibility provided by new storage and interconnectors (as well as demand side response, discussed above) to reduce costs in support of an affordable supply"* and *"storage and interconnection can provide flexibility, meaning that less of the output of plant is wasted as it can either be stored or exported when there is excess production. They can also supply electricity when domestic demand is higher than generation, supporting security of supply"* (para 3.3.6);
- explains that with this flexibility the total amount of new generating plant capacity is reduced resulting in substantial savings (para 3.3.6);
- specifically recognises the role of interconnectors stating that "*interconnection can facilitate a secure, low carbon electricity system at low cost*" (para 3.3.32) and that "*the UK recognises the benefits of increasing levels of interconnection and has an ambition to realise at least 18GW of existing and planned interconnector capacity by 2030*" increasing the current interconnection capacity of 8.4GW (para 3.3.33);
- at paragraph 3.3.35 advises that "*interconnection can provide access to a diverse pool of generation allowing the import or export of cheaper electricity by responding to changes in market signals, and providing the system with additional flexibility. Interconnectors can provide a range of system services, such as voltage and black start services; and can also help to reduce the curtailment of renewable energy"*;
- advises at para 3.3.56 that all the generating technologies mentioned (which includes the reference to the role of interconnectors) are urgently needed to meet the Government's energy objectives of:
    - *"providing security of supply (by avoiding concentration risk and not relying on one fuel or generation type)*
    - *providing an affordable, reliable system (through the deployment of technologies with complementary characteristics)*
    - *ensuring the system is net zero consistent (by remaining in line with our carbon budgets and maintaining the options required to deliver for a wide range of demand, decarbonisation and technology scenarios, including where there are difficulties with delivering any technology)"*.

2.8.1.5. Paragraph 3.2.5 requires the Secretary of State to *"assess all applications for development consent for the types of infrastructure covered in the NPS on the basis that the government has demonstrated there is a need for those types of infrastructure which is urgent"* and paragraph 3.2.6 states that *"the Secretary of State has determined that substantial weight should be given to this need when considering applications for development consent"* (our emphasis).

2.8.1.6. Paragraph 3.2.7 advises that the Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established in the NPS.

2.8.1.7. Paragraphs 3.2.10 and 3.2.11 specifically addresses types of energy infrastructure not covered by sections 15 to 21 of the Planning Act 2008 but which are considered to be nationally significant (as confirmed by a section 35 direction) and that where an application is for electricity generation infrastructure or electricity network infrastructure not covered by the Planning Act the Secretary of State should give substantial weight to the need established in the NPS.

2.8.1.8. In summary, the draft NPS further reinforces the urgent need for new energy infrastructure and specifically recognises the role of interconnectors in delivering the Government's energy objectives. The Secretary of State is required to give substantial weight to this need in decision making[5].

2.9. ESO INTERCONNECTOR REPORT[6] (AUGUST 2022)

2.9.1.1. This report prepared in August 2022 by the ESO at the request of Ofgem (to support the third cap and floor window) provides analysis on the system need for, or potential impact of, future interconnection in different GB regions from the perspective of system operability.

2.9.1.2. The report reiterates (at page 4) the important future role of interconnectors and the need to increase capacity:

> *"Interconnectors will play an important supporting role in achieving net zero by 2050, contributing to security of supply and providing flexibility. To achieve this, the levels of interconnection capacity on the GB network will increase considerably, from 8GW currently (with ElecLink having commenced operations in late May 2022) to potentially 28GW as found in the FES21 Leading the Way scenario. This is in line with the commitment BEIS made in 2020 to work with Ofgem and developers to realise at least 18GW of interconnector capacity by 2030."*

2.9.1.3. The report also (at page 4) reiterates the important role in providing flexibility on the electricity system:

"*Interconnectors are technically a flexible and capable asset with significant potential for consumer benefit. Interconnectors are increasingly becoming a key source of flexibility on the electricity system and in the future will constitute a significant portion of the overall supply and demand mix."*

2.9.1.4. The modelling undertaken for the report demonstrates that the impact on constraint costs (i.e. where the ESO pay generators to constrain output when generation output exceeds network capacity) in the GB system is determined by the geographical location of the interconnector and the import and export flow across the interconnector (page 3).

2.9.1.5. The results (as shown at Figure 8 of the report) demonstrate that interconnectors located in the South of England would reduce constraint costs (in all import and most export scenarios) as the interconnector would be supplying an area of high demand and less electricity would be required to flow from north to south, leading to reduced balancing actions.

[5]AQUIND Interconnector (insofar as the draft EN-1 is considered to be important an relevant) is, therefore, covered by both paragraph 3.2.5 (as a type of infrastructure covered in the NPS) and under 3.2.11 (as a type of infrastructure not covered by the Planning Act 2008 and subject to a section 35 direction).

[6] *ESO analysis to support Ofgem's Third Cap and Floor Window and MPI Pilot Regulatory Framework* – National Grid ESO (August 2022)

2.10. TEN YEAR NETWORKS DEVELOPMENT PLAN 2022

2.10.1.1. The Second Needs and Benefits Addendum outlined that in November 2020 the European Organisation of Network Transmission System Operators - Electricity (ENTSO-E) published for consultation the results of a new Ten-Year Network Development Plan assessment (their bi-yearly pan-European plan for electricity infrastructure development).

2.10.1.2. The TYNDP 2022 is the latest release of the plan and was consulted on at the end of 2022 and again includes AQUIND Interconnector. It demonstrates positive results across each of the scenarios tested in terms of the benefits delivered by the projects in TYNDP 2022 including:

- increases in socio-economic welfare: through decreases in overall generation costs across Europe by facilitating additional exchange capacity which favour the mutualisation of cheap generation capacity in place of expensive thermal generation.
- reduction in CO2 emissions: new transmission and storage projects allow to replace expensive CO2 emitting generation by cheaper, low carbon generation.
- integration of Renewable Energy Sources: noting that transmission (and storage) infrastructure makes more renewable sources available to market by providing direct connection to the power system and by avoiding curtailment of renewable generation.

2.10.1.3. This is reflected in the results for AQUIND Interconnector[7] which demonstrate the project would contribute to an increase in annual socio economic welfare (across the study area), reduction in CO2 and greenhouse gas emissions, integration of renewable energy sources (through avoided curtailment) and security of supply (by reducing Energy Not Served) in all scenarios.

2.10.1.4. A linked study by ENTSO-E, *Opportunities for a more efficient European power system in 2030 and 2040 (January 2023)*[8]*,* provides further analysis on the need for greater connectivity between countries. It corroborates the targets in the Energy White Paper (and as reflected in the draft NPS EN-1) by identifying a total need for additional GB cross border capacity of circa 7.65GW additional to the 'starting grid' position of 10.55GW in 2025 (i.e. comparable to the 18GW target by 2030).

2.10.1.5. This specifically includes an additional 4.8GW of interconnectors between GB and France by 2030 on top of the starting grid position of 4GW (IFA2000, IFA2 and Eleclink) in 2025.

2.11. STATEMENT OF COOPERATION ON ENERGY BETWEEN UK AND FRENCH GOVERNMENTS (MARCH 2023)

2.11.1.1. The Statement of Cooperation on Energy was made between the UK and France on 10 March 2023, being signed by the Rt Hon Grant Shapps MP, the Secretary of State for Energy Security and Net Zero, on the UK side[9]. It sets out the intent of the two governments to "*strengthen cooperation on their shared interests and ambitions in the three pillars of energy resilience (including energy security and electricity interconnection), energy transition, low carbon technologies and domestic climate policies, and civil nuclear."*

2.11.1.2. The declaration specifically recognises "*the central role of electricity interconnection in their mutual energy security of supply, the green transition and prosperity"* and that UK and France will "*commit to make their best efforts to progress future interconnection projects between their countries…"* (our emphasis).

2.12. INTEGRATED REVIEW REFRESH 2023: RESPONDING TO A MORE CONTESTED AND VOLATILE WORLD (MARCH 2023)

2.12.1.1. The Integrated Review Refresh[10] states that to support GB energy security "*In Europe, we are renewing our participation in the North Seas Energy Cooperation group, and agreeing closer cooperation on nuclear energy and electricity interconnection with France.*" (our emphasis)

[7] h[redacted]

[8] [redacted]

[9] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1141799/UK-FR_Joint_Energy_Statement.pdf

[10] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1145586/11857435_NS_IR_Refresh_2023_Supply_AllPages_Revision_7_WEB_PDF.pdf

3. SUMMARY AND CONCLUSION

3.1.1.1. The evidence supporting the need for AQUIND Interconnector, as demonstrated in the Needs and Benefits Report and first two addenda, is already overwhelming, as recognised by the Examining Authority in making its recommendation to grant development consent in June 2021.

3.1.1.2. This need has become even stronger and more urgent in the intervening time period.

3.1.1.3. Powering up Britain published in March 2023 (alongside the Energy Security Plan and Net Zero Growth Plan) emphasises the objective of achieving energy security and specifically recognises the important role of interconnectors as a source of resilience and efficiency.

3.1.1.4. The draft NPS EN-1 (published for consultation shortly afterwards in March 2023) also specifically recognises the benefits of interconnectors and repeats the target set out in the Energy White Paper to achieve at least 18GW of capacity by 2030. The draft NPS (like the currently designated NPS which continues to have effect for the determination of AQUIND Interconnector) requires the Secretary of State to give substantial weight to considerations of need identified in the NPS.

3.1.1.5. The need to increase interconnector capacity is corroborated by the analysis by ENTSO-E as part of the TYNDP 2022 which identifies a specific need for additional 4.8GW of interconnection between GB and France by 2030 (on top of the starting position of 4.0GW in 2025). The TYNDP also highlights the benefits of increased interconnection, and the AQUIND Interconnector specifically, in terms of increased socio-economic welfare, reduction in CO2 emissions and integration of renewable energy generation.

3.1.1.6. The Statement of Cooperation between the UK and France on 10 March 2023 recognises the central role of interconnection for mutual energy security and supply and commits to making best efforts to progress future connection projects between the two countries.

3.1.1.7. In summary, the additional strategies, evidence and announcements since the last addendum report in January 2021 further highlight and emphasise the compelling need for and benefits of AQUIND Interconnector on a national level, which should be given substantial weight in the planning balance.