

**From:** [REDACTED]  
**To:** [Aquind Interconnector](#)  
**Subject:** Submission for 23.12.2020  
**Date:** 16 December 2020 09:26:39  
**Attachments:** [submission7.12..docx](#)

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Dear Planning Inspectorate,

I am sending you in an attachment the submission for the Let's Stop Aquind group.

Please confirm you have received this.

Regards,

Viola Langley.

I am here today to represent our Facebook Group Let's Stop Aquind which was set up a few weeks ago , growing in numbers very fast. Many members of the group feel deeply worried about the Aquind Interconnector project and what it will mean to them personally, for the city of Portsmouth and along the route right up to Lovedean.

We live in challenging times and with COVID we have come to appreciate even more the few green spaces we have . Climate Change forces us to re-evaluate everything. In this situation we need to look at this Interconnector Cable afresh.

The interconnector cable would be imposed on the most densely populated city with already extremely high pollution levels. And the question we cannot find an answer to is WHY here ? People , councillors and MPs reject it and give you their expertise why this should not go ahead.

I will concentrate on the impact this project is having on the people who live here, breath the air and would have to live with the consequences should approval be granted.

Firstly, I would like to look at Aquind's engagement with the public.

Vielleicht sollte ich das auf Deutsch erklaren, damit Sie das etwas besser verstehen.

You might have been puzzled and wondered what I was saying, what it all meant? This is exactly how the people affected by this ,have told ,me they felt. A language, arcane , unfamiliar, incomprehensible. People feel intimidated, threatened and disregarded.

Shall I continue in German or should we find a common language we can all understand?

What a waste , all those letters pouring out from Aquind, with no regard to whether they are accessible to the addressee.

The language of the documentations should have been accessible to the people who will be affected.

How can they make the right decision when they have no idea what the issues are.

The public consultations were perceived as presentations with no real engagement.

During this so called consultation period only 157 responses were recorded but surely you must have noticed that a sudden increase of objections flooded in at the beginning of October this year when we started our campaign.

This tsunami is the result of real engagement, real consultation. You are the experts using expert consultants but you failed lamentably in the simple task of engaging with the public. This failure inspired us to put matters right, to let people know what is going on.

It would seem that public scrutiny of this proposal is not welcome. Is it and we wonder why?

Once people were alerted and better informed by our grassroots group a number of important questions have been raised.

1. Why is this Interconnector project a Nationally Significant Infrastructure Project?
2. Why have our local authorities been made powerless?
3. Why would people risk degrading, destroying and disturbing our already threatened environment ?
4. Why should people be expected to lose access to green spaces even for a day and why would we risk to unbalance our already fragile habitats ?
5. Why should residents put up with disturbance and disruption to their local environment ?
6. What impact will this project have on air pollution for the residents when one of the main arteries in and out of Portsmouth will be disrupted? The air pollution is already at an alarming high causing respiratory illnesses, lung diseases and asthma.

7. Why have there been no studies of the negative effects on of this project on the mental and physical health of local people?

8. Why are the residents being asked to contend with traffic chaos, the air and noise pollution?

9. Why should local businesses face a disruption to their fragile economic situation?

10. Why should people have their properties being taken away from them either short or long term by Compulsory Acquisition ?

And the list goes on and on and on and on.

Mirroring our partners in France . Above all this is the great unknown.

Long term effects living alongside HVDC cables. No scientific study exists which shows these project are harmless. Electro-magnetic field emissions are a real concern for people living next to the cable. The question remains why has this route been chosen? Is this because of the data cable?

Another sore wound is Milton Common with over 200 different species of plants , wild life of which many are protected. This is one of our only areas of natural biodiversity.

The Common is a renowned area of historical landfill with dangerous and hazardous material ( Asbestos and Methane ). What would happen if this would be unleashed by diggers ? Only one speck of asbestos can cause a fatal lung disease. Our contact with grandparents and great grandparents forced us to consider events from years ago. These older people recall fires burning continuously as the many materials combined and reacted when the site was being filled. Who now knows what exactly is there?

To top it all we have Milton and Eastney Allotments.

Dear Examiners, can you imagine the stress and anxiety caused to allotment holders by the ever changing proposals? And now the inclusion of allotment holders in the Book of Reference raises new questions, doubts and worries.

So, dear Examiners, what can we expect from you? Can we expect you to fully comprehend the anxiety this project has caused, is causing and will cause in the future.?Are you going to help people who will have to live with the consequences of this project forever?

Our government speaks of Climate Change, rebalancing our environmental values. It is time not to pay lip service but to act. We, the people, have come together with our councillors and MPs to make this threat real to you, to show you our concern for our local environment and beg you to let not money for the few but the health and welfare of us all, rule. We do not need , do not want and we will not tolerate this project.

**From:** [viola langley](#)  
**To:** [Aquind Interconnector](#)  
**Subject:** submission for 23.12.2020 let's stop aquind  
**Date:** 16 December 2020 19:00:31  
**Attachments:** [submission16.12.2020.docx](#)

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Dear Planning inspectors,

Please find attached our second submission to elaborate in more detail.

Regards,  
Viola Langley

Submission 16.12.2020

" Let's Stop Aquind "

"People shouldn't panic , but they should begin drastic change. Business as usual with small adjustments won't be enough. (Guardian 12.June 2019 Human Society under urgent threat from loss of Earth's Natural Life)"

I am writing to you today again on behalf of the local people, members of "Let's Stop Aquind ", who will be affected by the Aquind Interconnector. Having watched the Open Floor and Specific Hearings over the last two weeks, we remain extremely concerned. All councillors and MPs have expressed their objections against it on many occasions but are obliged to collaborate and find the best solution. They are forced to help and support to make this scheme work.

How can this be? How can we support a scheme which is on so many grounds unacceptable, ludicrous and highly dangerous. At least we at "Let's Stop Aquind" do not need to accept this and can take a more robust, independent stance, totally opposing the Project.

You, dear Examiners , have listened to all the evidence local authorities have given you. Their evidence is largely against the Applicant's project. Yet the local authorities are forced to "make it work".

A lot of people in our area still do not know about this Scheme, others say" It is a done deal", but we say NO it is not. This is a democratic process, we hope, where all parties have a right to speak and explain their views. Yet the most important aspect, people who live along this route, have so little influence.

ARTICLE 8 of the European Convention of Human Rights states: "Right to respect for private and family life

1. Everyone has the right to respect for his private and family life, his home and his correspondence. 2. There shall be no interference by a public authority with the exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interests of national security, public safety or the economic well-being of the country, for the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others"

Now let's have a look at this. "The right to respect for private and family life, his home ..."  
Can you really imagine what this route means for the people who live here? The interference with daily life all day and night long. You heard about the effects of traffic, gridlock, pollution, noise, interference with shopping facilities after a long day's work, just to mention a few. It will have huge impacts on family life and certainly on their homes, associated parking facilities and public transport.

Aquind does not live here, has no idea what traffic along this route is like under normal circumstances. How can they? Have they really considered all possible options? They say so

but have they? Is it not yet again merely a question of money? Why should we locals accept this? Should profit for the few come before the well-being of the community? Is this not a private company which says in the Press that this project is a good investment? Why should we and our children and grandchildren pay for this with our mental and physical health? For the benefit of whom?

Today, 16.12. we heard of the death of Ella Kissi-Debrah, the first person in the UK to have air pollution listed as a cause of death. As you know , Portsmouth is the 16th worst-polluted city in the UK and our pollution levels are dangerously high. Can we just stand by and watch this worsen even more? Have you, dear examiners , not got the duty to prevent this? How are you going to do this, should this project, go ahead?

We are told by the Applicant that we shall benefit by cheaper, cleaner and greener electricity .At what price? Do we sacrifice human life for electricity? On top of this is the Telecommunications System, conveniently slipped into the application! Yet more profit for the developer? We cannot let this happen --or can we? Does money always have to come first?

"With the exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interests of national security"

This point is very interesting. The question has been asked many times. Why has this project being given NSIP status? We have openly read about donations to the Tory party. We had Secretaries of State recusing themselves from this project. We have heard that the money is coming from the BVI and openly identify the owner. Is this democratic? Is this in the interest of People of the United Kingdom? Is this a matter of National Security? The question arises - in whose interest is it if the local people, local authorities cannot support this project?

Local people are concerned about the consequences this project would have on their mental and physical health. And would you , dear examiners, not feel the same if you lived here? I suggest you spend a month in Portsmouth to get an idea about the reality and not just read a report of Aquind's, relating to the traffic conditions. This is not adequate under COVID restrictions as normal traffic conditions do not apply.

" public safety" Is this scheme safe for the public? Aquind is revising the route. Why? So many issues overlooked, so many environmental matters not fully considered. Even though an environmental report has been presented by Aquind to you, the examiners, Aquind has frequently had to make amendments . What is going to happen when the project starts? What surprises will we find? They cannot give us a guarantee that HDD will be the only method used in the allotments? Milton Common and its asbestos are still a huge stumbling block. Would you like to live near somewhere you know asbestos has been buried or methane gas escaping?



" For the protection of health and morals" Is this scheme really for the protection of health? Higher pollution levels , fewer green spaces, loss and/or destruction of wildlife habitat are just a few risk factors.

Is this case an important turning point to show that democracy still exists ?

Will we reject this project on moral grounds?

How will we explain to our children that we did nothing to stop this when the evidence is there:

"The health of the ecosystems on which we and other species depend is deteriorating more rapidly than ever. We are eroding the foundation of economics , livelihoods, food security , health and quality of life worldwide" says ██████████ ( chair of the Intergovernmental Science Policy Platform on Biodiversity and Ecosystem Services). Over 140 vulnerable plant species on Milton Common alone.

We, who live along the route care for our environment, for our habitats, for our wildlife, for ourselves, our city and above all for our planet which is in crisis.

Mitigation cannot correct the damage this project is going to cause. We have to emphasise the importance of the resistance of local people who know about the scheme and appeal to you, the Examiners, to make sure you make the right decision in the short and long term.

There are alternatives. A different connection point. A different landing point. A different route. A reassessment of energy needs. A choice towards sustainable energy sources. An awareness of France's intention to shut down 14 Nuclear Power stations over the next decade. This project is not needed.

" Human Rights @Protocol 1, Article 1 protects your right to enjoy your property peacefully"

Is this really possible if this scheme is approved? You have heard people appealing to you, the Examiners, asking you to understand their worries, concerns and anxieties. People have not been reassured , they are distressed and highly agitated and some of them even resigned themselves to the fact that a huge company with money will be deciding their future and they feel powerless. But , we say this is bigger, this is part of a responsibility you have not just for our cities and villages along the route but for the environment, nature and the future of the planet, Yes, it is this important because it is an example of what we cannot afford to do any longer. This is an emergency and the brakes have to be put on---now.

Article 14 Of the Human Rights act " requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination

Discrimination occurs when you are treated less favourably than another person in a similar situation and this treatment cannot be objectively and reasonably justified. Discrimination can also occur if you are disadvantaged by being treated the same as another person when your circumstances are different (for example if you are disabled or pregnant)."

We have explained to you clearly how the consultation process was perceived by the public. During the consultation process people did not understand the project. They still do not understand the complicated language used, the huge volume of information published almost daily , the letters they received with no clear information. What does it mean to be an interested or an affected person? They still struggle and this is the reason why you had no more submissions or requests for participation in Open floor Hearings. Have we not been treated " less favourably " here because the language is not common to all? Is this not discrimination?

Yet the price for pollution, degradation and disruption will be paid by those who did not choose this Interconnector Scheme.

Dear examiners, a DCO relating to a dubious Nationally significant Infrastructure Project with no real advantage for the country, should not be granted , we say. But you have the unenviable task of considering the merits or demerits of this scheme.

Do not local people and authorities know their environment better ? Our caring attitude has led us to unite all parties , councillors and local people. Can this be so wrong? We beg you, dear Examiners, to see the bigger picture for us and to secure our future. Consider our needs, not the profits of a private company!

**From:** [REDACTED]  
**To:** [Aquind Interconnector](#)  
**Subject:** Additional submission from let's Stop Aquind  
**Date:** 21 December 2020 14:41:04

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Dear Planning Inspectorate,

This is an additional submission for deadline 6 from Let's stop aquind.

Reference Aquind Interconnector. "Let's Stop Aquind"

Having had more time to analyse the optioneering process undertaken by the applicant we strongly recommend that the Examining Authorities direct the applicant to go back to National Grid and seek alternatives to the connection point at Lovedean. We would suggest that National Grid reconsiders their choice. Aquind clearly says "the final choice of a connection point was determined by national grid". Why did NGET issue a Connection Offer for Lovedean when it surely must have been obvious that getting to Lovedean would prove very problematic if not impossible.

Three Options are available;

1. Build a new substation nearer to cable landfall causing little environmental/people disturbance. A new substation could improve the electricity network on the South coast. National Grid themselves recognise this needs upgrading in any case.
2. Connect to an existing substation nearer to the coast and increase its capacity ,if necessary, to carry the extra supply eg. Fawley or Ninfield ? For Aquind to argue that Lee on Solent is not a suitable landing site for the cables is patently wrong. There is plenty of room to build the Convertor Halls on the Daedalus Site. We recognise this is shifting the development problems to another patch but one has only to visit the Lee on Solent and the Daedalus sites to see there is capacity to expand the Industrial area without impinging on vulnerable habitats or disrupting the lives of 100's of thousands of residents.
3. The question is whether this interconnector is NOW needed. Other interconnector schemes have been constructed, FAB link , Belgium Sizewell on Sea , Eleclink etc. Lack of Interconnection capacity is no longer as argued in Aquind's application.

Will you please consider these alternatives.

Viola Langley

Please confirm you received this additional submission

**From:** [REDACTED]  
**To:** [Aquind Interconnector](#); [REDACTED]  
**Subject:** Additional Submission Let's Stop aquind  
**Date:** 22 December 2020 16:08:57  
**Attachments:** [Langley Dawson Objection Aquind.docx](#)  
[Langley Dawson Objection Aquindpdf.pdf](#)

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Dear Planning Inspectors,

Please find attached an additional submission form Let's Stop Aquind with three main contributors.

Please confirm receipt of this email with attachments.

Regards,

Viola Langley

The Examining Authority  
Aquind Interconnector (EN020022)  
The Planning Inspectorate  
Temple Quay House  
Temple Quay  
Bristol  
BS1 6PN

22 December 2020

Dear Sirs,

## Objection to the Aquind Interconnector (EN020022)

We wish to register a further objection to the Aquind Interconnector proposal (EN020022) on the primary grounds that the case for connecting at Lovedean substation is not established. Insufficient evidence has been submitted either directly by Aquind Ltd or indirectly by National Grid plc that the best route for an interconnection with France has been selected.

There are secondary grounds for our objection and these are outlined in the appendices.

If you believe that the issues and questions we raise here are of public interest, we should be grateful if you would present them to the Applicant in ExQ2 for their response. To aid in that process we have highlighted them in bold in the body of the letter and consolidated all 17 questions (9 for the Applicant) as an attachment to this letter.

### Approach

Focussing on the options that led the Applicant to choose to construct a 2GW interconnector from Southsea Beach to Lovedean substation, we have selectively reviewed the following documents and researched some of the technical issues on the internet:

1. The Applicant's Environmental Statement, Volume 1, Chapter 2: Consideration of Alternatives November 2019<sup>1</sup>
2. The Examining Authority's First Written Questions (ExQ1) July 2020<sup>2</sup>
3. The Applicant's Response to Written Questions ExQ1 October 2020<sup>3</sup>
4. The Applicant's Environmental Statement Addendum – Appendix 3 Supplementary Alternatives Chapter<sup>4</sup> (October 2020)

### The Issues

[1] It is not been identified why the Applicant choses to interconnect to France.

**[Q1] Why has the Applicant chosen to interconnect to France rather than Belgium, The Netherlands, Germany, Denmark or Norway? What technical or financial factors influenced that decision?**

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<sup>1</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>

<sup>2</sup> [https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-001148-EN020022%20AQUIND%20-%20Examining%20Authority%20Written%20Questions%20\(ExQ1\).pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-001148-EN020022%20AQUIND%20-%20Examining%20Authority%20Written%20Questions%20(ExQ1).pdf)

<sup>3</sup> <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-001593-7.4.1%20-%20Applicants%20Responses%20to%20ExQ1%20Master.pdf>

<sup>4</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>

[2] The Applicant's analysis of options was undertaken several years ago and is not current. Many of the factors in favour of or against one option or another are now superseded by more recent events and information. Here are two examples:

*"Further discussion with NGET identified that whilst Fawley had been considered as a suitable connection point in the initial technical and economic feasibility study, as a 2000MW oil-fired power station had recently been de-commissioned there, NGET advised that part of this capacity was being taken up by a new gas-fired power station and much of the available site was being re-developed. Fawley was therefore not considered further."* Ibid 5.1.1.6

*". . . a connection agreement for the 970MW Navitus Bay offshore wind farm was in place in relation to the Mannington substation when the feasibility study was carried out, and therefore it was not considered to be suitable for the proposed connection."* Ibid 5.1.1.7

A further statement in clause 5.1.1.7 *" . . . it (is) not reasonable for the Applicant to re-consider the potential for a connection at Mannington . . . and this was not considered further"* does not discharge the Applicant from a responsibility for due diligence to the public. I hope the Examining Authority concurs.

**[Q2] Could The Examining Authority please request the Applicant to update their analyses of alternative routes and publish their complete approach, analyses, findings and conclusion?**

[3] Anyone with local knowledge of central southern England will know that a substation at Fawley, Marchwood, Chilling, Botley Wood or Chickerell represents a far more efficient outcome in terms of connecting to a National Grid substation.

The Applicant dismisses the substations at Botley Wood, Fawley, Marchwood and Nursling, on the grounds that *"the submarine cable would be required to be located through the busy shipping area around the Isle of Wight"*<sup>5</sup>. This is not a substantive argument against Botley Wood, Fawley, Marchwood and Nursling.

**[Q3] Could The Examining Authority please request if the Applicant is willing to work with National Grid plc and reconsider Fawley, Marchwood, Chilling, Botley Wood and Nursling substations as viable connection points?**

[4] The Applicant rejected Mannington substation on the grounds that *"the shared connection point with the 970MW Navitus Bay wind farm raised technical concerns"*. That has not been an issue since September 2015 when planning permission was refused.

**[Q4] Could The Examining Authority please request if the Applicant is willing to work with National Grid plc and reconsider Mannington substation as a connection point?**

[5] I am concerned about the *"arm's length"* relationship that National Grid plc has with the public planning process for the Aquind Interconnector proposal and the apparent lack of accountability and transparency in their decision-making that affects not only local communities but also society-at-large.

I understand the need for some confidentiality for security reasons, but I do not understand the apparent need for total confidentiality. At very least I would call for a security-cleared independent assessor to review the Connection & Infrastructure Option Note (CION). Could this be the Examining Authority?

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<sup>5</sup> Page 15, <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>

In any event, I understand National Grid plc have an obligation to keep any Connection & Infrastructure Option Note (CION) updated.

**[Q5A] Could The Examining Authority please consider the appointment of a security-cleared independent assessor to review the Connection & Infrastructure Option Notes (CIONs) of Chickerell, Mannington, Fawley, Marchwood, Chilling, Botley Wood, Nursling and Lovedean substations?**

**[Q5B] It would also be helpful to see a December 2020 update to the OFGEM document: Exhibit 6 – UK Connection & Infrastructure Option Note (CION), the Aquind Interconnector<sup>6</sup>.**

[6] While the Applicant cites the Environmental Impact Assessment Regulations, it is disappointing that a wider set of evaluation criteria was not adopted for the Aquind EIA. A wider set of evaluation criteria might include, for example, those suggested by the World Bank's Equator Principles<sup>7</sup> (especially Principles 2, 7, 9 and 10 and Exhibit II) or the United Nations Environmental Program<sup>8</sup> including weightings and rankings that (a) recognised how closely the proposal supports the government's national policy for a resilient electricity distribution infrastructure, (b) the urgent move towards non-fossil fuel sources of power and the (c) impact on the local population in particular and society in general.

**[Q6A] Could The Examining Authority please request the Applicant to publish a list of the quantitative data (variables, weightings, rankings) used in their EIA for the various substation options?**

**[Q6B] Could The Examining Authority please request to conduct a wider set of evaluation criteria?**

**[Q6C] What has been done to identify and ameliorate the negative social, societal, cultural and environment effects of this complex engineering proposal? Has the Applicant conducted a social impact assessment?**

[7] I have compared the analysis published by the Applicant with the analysis published by the FAB Link team (FAB Link Connection Options Study<sup>9</sup>) and find significant variations in the arguments for and against one substation connection or another.

**[Q7] Could The Examining Authority please request the Applicant to work with Transmission Investments Ltd (FAB Link UK developer) and National Grid plc to find statements of common ground regarding the pros and cons of each substation?**

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<sup>6</sup> [https://www.ofgem.gov.uk/system/files/docs/2020/12/exhibit\\_6\\_-\\_cion\\_and\\_cion\\_information\\_note.pdf](https://www.ofgem.gov.uk/system/files/docs/2020/12/exhibit_6_-_cion_and_cion_information_note.pdf)

<sup>7</sup> <https://equator-principles.com/wp-content/uploads/2020/05/The-Equator-Principles-July-2020-v2.pdf>

<sup>8</sup> [https://wedocs.unep.org/bitstream/handle/20.500.11822/8753/Environmental\\_impact\\_assessment.pdf?sequence=3&isAllowed=](https://wedocs.unep.org/bitstream/handle/20.500.11822/8753/Environmental_impact_assessment.pdf?sequence=3&isAllowed=1)

<sup>9</sup> <https://www.fablink.net/wp-content/uploads/2016/07/Appendix-1a-Connection-Point-Selection-Report.pdf>

## Appendix I – Policy Issues

There are three issues that, we understand will fall outside the remit of this Examination. Nevertheless, we include them here in the hope that they may offer some insight into the future handling of planning permissions for Nationally Significant Infrastructure Projects (NSIPs).

### 1. National Policy Statement for Interconnections

[A1] We have been unable to locate a national policy statement for electricity interconnections. Clauses 3.3.32 and 3.3.33 of the Overarching National Policy Statement for Energy (EN-1)<sup>10</sup> (2011) make very limited reference. A word search in the National Policy Statement for Electricity Networks Infrastructure (EN-5)<sup>11</sup> (2011) for “interconnections” gives a nil return.

We suggest that no proposed development should be designated an NSIP by the government of the day unless it supports a national policy, usually declared in a national policy statement.

**[QA1] Does Great Britain need more interconnectors or not? Where is the declaration of need?**

### 2. The Planning Act 2008

[A2] The specific reference to *electric lines* in The Planning Act 2008 (PA2008) concerns the installation of electric lines above ground<sup>12</sup>, There is no specific or general reference to electric lines below ground. For this reason we have been unable to understand the legal framework for The Planning Inspectorate processing the Aquind Interconnector proposal as a National Significant Infrastructure Project under PA2008.

**[QA2] Why does PA2008 make no reference to the installation of electric lines below ground or below water? What was intended by their omission?**

### 3. Energy White Paper

The Energy White Paper *Powering our Net Zero Future* (December 2020)<sup>13</sup>, setting out proposals for future legislation, makes significant reference to interconnections. It offers some insight into how the UK energy infrastructure in general and interconnectors in particular might be managed. It would be unfortunate if planning permission was granted to the Aquind Interconnector proposal (EN020022) ahead of the White Paper being enacted.

## Appendix II – The Applicant’s Track Record

It is our understanding that, unlike other companies in this sector, including National Grid plc themselves, the Applicant is not an established company with a proven track record in delivering and managing projects of this magnitude.

By all conventional measures, it is reckless to embark on such a high risk / high value project without first building a track record of success in the industry. The Applicant has none and has not elected to form a commercial joint venture with any organisation that has.

**[QA3] In the future event that the Applicant fails to remain a going concern, who is liable for the outstanding project works or the ongoing maintenance and operation and divestment of the asset?**

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<sup>10</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/47854/1938-overarching-nps-for-energy-en1.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/47854/1938-overarching-nps-for-energy-en1.pdf)

<sup>11</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/47858/1942-national-policy-statement-electricity-networks.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/47858/1942-national-policy-statement-electricity-networks.pdf)

<sup>12</sup> <https://www.legislation.gov.uk/ukpga/2008/29/section/16>

<sup>13</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/945899/201216\\_BEIS\\_EWP\\_Command\\_Paper\\_Accessible.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/945899/201216_BEIS_EWP_Command_Paper_Accessible.pdf)



**[QA4] To whom is the Applicant liable in the event of failure or bankruptcy? Do any liabilities fall to HMG and how are these risks mitigated? Where do the risks fall?**

**[QA5] Under the terms of their licence in the UK and in France, are the Applicant's shareholders permitted to sell all or any of the shares in the company or all or any part of the assets comprising the end-to-end interconnector to any third party, national, offshore or multinational?**

### Appendix III – Managing the Proposal and the Project

Even at this stage, it is expected with a proposal of this scale that the Applicant has already set up a project or programme office in accordance with one of the established project management standards (ISO21500, BS6079 or ANSI/PMI99-001) and is operating a set of processes, inter alia, to manage risks.

**[Q] Assuming all project risks are classified as high, medium or low, could The Examining Authority please request the Applicant to publish a list of programme risks that they have identified to date as having a high probability of occurring or as having high impact on local communities if occurring?**

### Appendix IV – Miscellaneous Questions

**[QA6] When operational, by what percentage can the Aquind Interconnector potentially reduce wholesale electricity prices in Great Britain? Has the fluctuation in wholesale electricity prices been modelled and a sensitivity analysis conducted? Over the first five years of operational life, what proportion of the time will the Aquind Interconnector not be fulfilling a demand for electricity one way or the other. Please publish a lay persons' summary.**

**[QA7] When operational, will OFGEM regulate the conduct of the Applicant and the service provided? If not, who will undertake that role?**

Yours faithfully,

*Signed by*

Viola Langley and David Langley (Registered Interested Parties)

Steve Dawson (contact in case of queries)



Attachment: Consolidated List of Questions or Requests

Consolidated List of Questions or Requests for the Applicant

[Q1] Why has the Applicant chosen to interconnect to France rather than Belgium, The Netherlands, Germany, Denmark or Norway? What technical or financial factors influenced that decision?

[Q2] Please update your analyses of alternative routes and publish your complete approach, analyses, findings and conclusion?

[Q3] Are you willing to work with National Grid plc and reconsider Fawley, Marchwood, Chilling, Botley Wood and Nursling substations as viable connection points?

[Q4] Are you willing to work with National Grid plc and reconsider Mannington substation as a connection point?

[Q6A] Please publish a list of the quantitative data (variables, weightings, rankings) used in your EIA for the various substation options?

[Q6B] Please consider incorporating a wider set of evaluation criteria into your EIAs?

[Q6C] What has been done to identify and ameliorate the negative social, societal, cultural and environment effects of this complex engineering proposal? Have you conducted a social impact assessment?

[Q7] Please work with Transmission Investments Ltd (FAB Link UK developer) and National Grid plc to find statements of common ground regarding the pros and cons of each substation?

[QA6] When operational, by what percentage can the Aquind Interconnector potentially reduce wholesale electricity prices in Great Britain? Has the fluctuation in wholesale electricity prices been modelled and a sensitivity analysis conducted? Over the first five years of operational life, what proportion of the time will the Aquind Interconnector not be fulfilling a demand for electricity one way or the other. Please publish a lay persons' summary.

Consolidated List of Questions to Others (Signposting welcomed)

[Q5A] Could The Examining Authority please consider the appointment of a security-cleared independent assessor to review the Connection & Infrastructure Option Notes (CIONs) of Chickerell, Mannington, Fawley, Marchwood, Chilling, Botley Wood, Nursling and Lovedean substations? Alternatively could the Examining Authority recommend how one might be appointed?

[Q5B] Could The Examining Authority please ask Ofgem to issue a December 2020 update to the Ofgem document: *Exhibit 6 – UK Connection & Infrastructure Option Note (CION), the Aquind Interconnector*.

[QA1] Does Great Britain need more interconnectors or not? Where is the declaration of need?

[QA2] Why does PA2008 make no reference to the installation of electric lines below ground or below water? What was intended by their omission?

[QA3] In the future event that the Applicant fails to remain a going concern, who is liable for the outstanding project works or the ongoing maintenance and operation and divestment of the asset?

[QA4] To whom is the Applicant liable in the event of failure or bankruptcy? Do any liabilities fall to HMG and how are these risks mitigated? Where do the risks fall?

[QA5] Under the terms of their licence in the UK and in France, are the Applicant's shareholders permitted to sell all or any of the shares in the company or all or any part of the assets comprising the end-to-end interconnector to any third party, national, offshore or multinational?

[QA7] When operational, will Ofgem regulate the conduct of the Applicant and the service provided? If not, who will undertake that role?