

From: [REDACTED]
To: [Aquind Interconnector](#)
Subject: Viola Langley Response to deadline 25.1.2021
Date: 11 January 2021 12:04:33
Attachments: [Responses to deadline 25.1..docx](#)

Please find attached my response to deadline 25.1.2021.
Please confirm you have received my submission.

Regards,
Viola Langley

Viola Langley

Responses to deadline 25.1.20201

Question1:

Is there a contradiction in the applicant's response to point 1 of my Open Floor Hearing submission? I am referred back to their comment in response to Judith Clementson point 4.

"It is also important to put the short-term effects of the pandemic in the context with longer term objectives and projections. The UK Government has this year **committed to achieving net zero carbon emissions by 2050**. As recognised in the recently published Government Response to the National Infrastructure Assessment (November 2020) this commitment is **“likely to result in a significant increase in electricity demand”**.

The National Infrastructure Strategy 1 Energy white paper: Powering our net zero future - <https://www.gov.uk/government/publications/energy-white-paper-powering-our-net-zero-future>
AQUIND INTERCONNECTOR WSP PINS Ref.: EN020022 Document Ref.: Applicant’s Response to Submissions made at Open Floor Hearings December 2020 AQUIND Limited Page 1-13 Key concerns raised in oral and written representations Applicant’s response (NIS) published at the same time also states that to achieve net zero the power system will need to be much larger to cope with additional demand from electrification in transport, heating and industry and that “this expanded system will require increased investments in network infrastructure, sources of flexibility, such as interconnection, demand response and storage and enough low carbon generation capacity to provide the vast majority of the UK’s electricity needs” . In summary, whilst the pandemic affects energy consumption in the short term it highlights the increasing demand for renewables, and the consequent need for flexibility to address issues of intermittency and security of supply, **the long term objectives for net zero will result in increased demand for electricity** and for the majority to be provided by low cost renewables."

2. Question:

Do I understand this correctly that our target to be net zero by 2050 increases our electricity demand? How does this interconnector project help in this situation?

3. Question

Can the applicant justify these statements in relation to a planning application and give quantifiable and verifiable data.

" In summary, whilst the pandemic affects energy consumption in the short term it highlights the increasing demand for renewables"

4. Questions:

What regulatory powers will be employed to ensure that costs to consumers are lower?

"and driving down costs for consumers."

5. Question:

Is the applicant entitled to promote the dubious associated development issue of enhanced FOC as part of the an answer to COVID implications on the Interconnector project?

"The commercial use of the fibre optic cables will assist in the delivery of improved services such as broadband speeds. Fibre connections are becoming increasingly desirable due to their high speeds. Demand for increased bandwidth is increasing as businesses, governments, organisations, and the public continue to rely on more interconnectivity, particularly in the wake of COVID19 where more distributed working arrangements have become the norm"

6. Question

Referring to my point three:

Are the examiners really satisfied that the optioneering process was properly conducted and concluded? Would you please consider the following document ?

Can we assume that you the examiners have not already had the benefit of this submission?

(You have this document as a PDF and word document file in your library)

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 2. The Examining Authority's First Written Questions (ExQ1) July 2020 3. The Applicant's Response to Written Questions ExQ1 October 2020 4. The Applicant's Environmental Statement Addendum – Appendix 3 Supplementary Alternatives Chapter 4 (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? 1 <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 2

[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) 3

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-001593- 7.4.1%20-%20Applicants%20Responses%20to%20ExQ1%20Master.pdf> 4

<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> Objection to the Aquind Interconnector (EN020022) S Dawson Page 2 of 6 22 December 2020 [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 reconsider 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"⁵. 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-atlarge. 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? 5 Page 15,

<https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN020022/EN020022-001488-7.8.1.3%20ES%20Addendum%20%20Appendix%203%20Supplementary%20Alternatives%20Chapter.pdf> Objection to the Aquind Interconnector (EN020022) S Dawson Page 3 of 6 22 December 2020 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 Interconnector6 . [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 Principles7 (especially Principles 2, 7, 9 and 10 and Exhibit II) or the United Nations Environmental Program8 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 Study9) 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? 6

https://www.ofgem.gov.uk/system/files/docs/2020/12/exhibit_6_-_cion_and_cion_information_note.pdf 7 <https://equator-principles.com/wp-content/uploads/2020/05/The-Equator-Principles-July-2020-v2.pdf> 8 https://wedocs.unep.org/bitstream/handle/20.500.11822/8753/Environmental_impact_assessment.pdf?sequence=3&%3B%20isAllowed=1 9 <https://www.fablink.net/wp-content/uploads/2016/07/Appendix-1a-Connection-Point-Selection-Report.pdf> Objection to the Aquind Interconnector (EN020022) S Dawson Page 4 of 6 22 December 2020 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)10 (2011) make very limited reference. A word search in the National Policy Statement for Electricity Networks Infrastructure (EN-5)11 (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 ground¹², 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) ¹³, 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? 10 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/47854/1938-overarching-nps-for-energy-en1.pdf 11 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/47858/1942-national-policy-statement-electricity-networks.pdf 12 <https://www.legislation.gov.uk/ukpga/2008/29/section/16> 13 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/945899/201216_BEIS_EWP_Command_Paper_Accessible.pdf Objection to the Aquind Interconnector (EN020022) S Dawson Page 5 of 6 22 December 2020 [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

Referring to point 4 consultation with the public:

7. Question

Are the examiners aware of the deficiencies of the presentation to the public in early 2019?

Please refer to:

<https://aquindconsultation.co.uk/wp-content/uploads/sites/13/2019/03/AQUIND-Interconnector-Exhibition-Boards.pdf>

When these presentation boards were used to present the scheme to the public you will see that on the board relating to landfall it is clearly stated that all parts will be underground at Fort Cumberland car park. There was no mention of the need to construct any building at this point. Indeed, in contrast, there is mention of 2 telecommunication buildings needed at Lovedean at the Converter Building.

8.Question

How could residents local to Ford Cumberland car park be so deceived?

9. Question

Are there not other examples of such lack of information or poorly communicated?

10. Question

Allotment holders recently completed a questionnaire sent to them by the applicant. **For what purpose was this questionnaire used?**

11.Question

Refer to insufficient consultation point 8 Kimberly Barrett:

"AQUIND has continued its engagement with key stakeholders and maintained an open line of communication with the local community"

Do the Examiners think the submissions from local residents support this view?

12. Question

Refer to point 5 regards NISP status

Though it is not a planning issue should the examining Authority not consider the political analysis of this project?

Refer to:

https://uk.news.yahoo.com/major-donor-britain-conservative-party-100420488.html?guccounter=1&guce_referrer=aHR0cHM6Ly93d3cuZ29vZ2xllmNvbS8&guc e_referrer_sig=AQAAAEc2kXgFJYTANevQOsTlbb94UbvKY9qU3hhbbpVmRptPQ4_ER6c6z8m PD_9G85dju0hbk0jAnR-UZ2kREa1IsE_WBdB5qqHQ1LN7laGSwnbXrMPbw7iFO5Wb_IQZmdt6o4NkoCYv3Pfli5BCzx1q qwaHVbY3bOKzM7sygD4Vtt4A

13. Question

Referring to answer 5b of response by Aquind

Aquind: "b. The Local Authorities are each statutory consultees, have been consulted throughout the process and are taking part in the Examination"

Will the ExA continue to recognise the unanimous objection by local authorities to the proposed project ?

14. Question

Is the ExA confident that the so called short term adverse effects are beneficial in the long term when local Authorities give all the evidence that it is questionable?

Aquind: "c- e. The SoS in considering any proposed development, and in particular when weighing its adverse impacts against its benefits, is required to take into account paragraph 4.1.3 of the Overarching National Policy Statement for Energy (EN1). This states that the SoS should take into account its potential benefits including its contribution to meeting the need for energy infrastructure, job creation and any long-term wider benefits and its potential adverse impacts, including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce or compensate for any adverse impacts"

15. Question

Referring to point 6 (electro- magnetic Field omissions) of response from Aquind

Is the ExA 100 % confident that there are no implications for the health of residents particularly where near to residents' homes (Moorings Way) ? There have been so far no scientific studies to prove this.

16. Question

Referring to point 7 of response by Aquind

"ES Chapter 18 (APP-133) identifies a record of possible methane at Milton Common from a record of an in-ground waste fire occurred in the early 1980s, which is understood to have been caused by ignition of methane in the ground. This has been taken into account and section 6.10.2 of the OOCEMP (REP4-005) sets out measures to be taken if contamination is present during construction and these include gas protection measures.!"

Why has the applicant not mentioned asbestos which was in my submission?

17. Question

Has the ExA received all relevant material regards asbestos on Milton Common and surrounding area of Fort Cumberland?

18.Question

How will the applicant deal with asbestos and prevent health hazards for the residents?

19. Question

What are the regulations with regards to asbestos in this DCO?

20. Question

Can the applicant describe in more detail what these methane gas protection measures are and how to give residents confidence that these are no health hazards for them?

21. Question?

Could there be any other hazardous materials (e g radium) on Milton Common considering their dubious origin?