

Comments on the responses to the SoS' letter of 13th July 2021

Ref: EN0020022

This document represents the combined views of the Grassroots Campaign Group "Let's Stop Aquind". It includes and comprises contributions from founder members and others in response to the SoS's requests for clarification relating to the commercial use of spare capacity in the FOC and the mitigation issues surrounding green spaces and sporting facilities impacted by the Interconnector project should it be given the go-ahead. Members feel strongly that other issues should be revisited and be considered at this stage of the pre-decision process.

We trust our submission will be accepted as our best attempt to counter the biased and patronising responses given to you, Mr SoS, by Aquind who, all through this painful process, have acted in a condescending and presumptuous manner.

Please forgive any inaccuracies- after all we are not experts. We are ordinary citizens under threat from an uncaring and, we believe, dangerous project. Please read our submission and take note of our concerns.

1) Optioneering failure

We have a major concern regarding the decision that led to Portsmouth, Eastney, being chosen as Landfall for Aquind's cables. A cursory glance at an atlas showing Southern England and Northern France clearly demonstrates the absurdity of linking Dieppe to Portsmouth by electrical cables.

The diagonal track traversing the English Channel, thereby covering 50 km extra distance, is a nonsense. For years the ferry route out of Dieppe has crossed to Newhaven. Even that route is not the shortest possible. The nearest point to Dieppe, on the South Coast of England, is the town of Bexhill on Sea.

Landfall to the West of Bexhill on Sea, at Cooden Beach, would leave 4.5 miles to reach Ninfield substation, a 400 KVA connection point. This option would have been much less damaging, much more straightforward, much shorter and could have been done in Local Planning procedure.

Why was this never considered? Why did the optioneering process completely ignore this possibility? There must be some very good reason for this decision

or is it simply that the diagram used to locate the available substation connection points was drawn from the original departure point from France in the Baie de la Seine ? There have been several references that Aquind Interconnector was from le Havre to Portsmouth as seems to have been the original intention. Could it really be an oversight? Or are there other more sinister possibilities? Has Portsmouth been deliberately targeted? For what reason? We must always focus on our reality of today which is that Portsmouth is the most densely populated city outside London, heavily polluted and declared a Climate Emergency.

The government demands that Portsmouth reduce air pollution levels but how can this be done if our city is under siege by heavy gridlock and traffic congestion caused by the Aquind Interconnector construction.

Have you, SoS, driven along the route chosen? Have you personally seen the traffic Portsmouth has to cope with under normal, everyday circumstances? One accident and the city comes to a halt. The consequences of long-term lane closures would have a huge negative impact on all people living in this area.

Why has Aquind not considered the possibility of Ninfield? We have seen that other sub-stations were included in the optioneering choices but Ninfield was never considered. Why was that the case?

2) Fibre Optic Cable capacity

It is evident that a large capacity F.O.C. somehow has been allowed to subvert the intention of the original granting of the DCO application. The application should be in the field of Energy not communications. At this point, on receipt of the application by BEIS, a Telecommunications System was outside the remit of the application. A coverall addition to the Proposed Development within the application was the phrase “together with associated development”. This appears to have allowed the applicant to “grow” the Data cable element into a full-blown Telecommunications System, thus necessitating the construction of 2 ORS each side of the submarine section of the cable.

Indeed, at early consultation meetings with residents in Portsmouth, illustrations with accompanying text were exhibited that stated clearly that after landfall at Eastney the cables would proceed UNDERGROUND through the carpark and take a below ground route through Portsmouth. No mention

of the misappropriation of one third of Fort Cumberland carpark for the construction of a stockade containing 2 Optical Regeneration Stations! And why should these 2 ORS be required? Other Interconnectors such as AFI2 or Gridlink use FOC technology for monitoring and control purposes. They do not need ORS as they are not building Telecommunication Systems. They are Interconnectors.

The SoS requested that Aquind remove the commercial part of the FOC from its application but Aquind are still insisting they need ORS buildings of a smaller size. Where is the technical evidence that supports this claim? An ORS is unnecessary for the operation of the Electrical elements of the Interconnector. Does this not do away with the need for any building in Fort Cumberland Carpark?

Beyond these two important issues we would like to draw your attention to Aquind itself. The ownership of Aquind is a very fluid concept. Since engaging in opposition to Aquind as a grassroots campaign, we have long sought to understand who and what Aquind is. On Companies House records it files accounts as a “small company”. And yet it seeks to reassure us that it has the means to deliver a project costing over a billion pounds. Its accounts show a huge debt and they confidently claim that this debt will be rolled over yearly to accommodate their needs. So, where has all this debt come from? Who is bankrolling this “small company”? Should 3 – 5 % of our energy needs be entrusted to this nebulous business? We know that Aquind has been splashing money about in the political arena – ministers had to recuse themselves because of this. It seems that money does talk. But are they a reputable Company?

What are the motives behind Aquind’s project? Is it because one of the owners has openly stated that the investment would be repaid in super quick time and thereafter huge profits would be made?

Does this profit motive outweigh the huge damaging impact the project would have on our city, its residents, the environment, the wildlife and green spaces including allotments?

Mitigation is no answer, talking about a 100,000 pounds is ridiculous. It is not a question of money but of physical, mental and societal health. Behind all this, of course is the environment. Can we afford to cause damage at this time in history?

Comments on the Applicant's responses to the Secretary of State's request for further information made on 13 July 2021

1. Mitigation and financial contribution proposals for sports grounds, playing pitches and recreational facilities in Portsmouth
2. Realignment of playing pitches
3. The Victorious Festival

Firstly the Applicant's response reveals the wide range of sporting facilities affected by the proposed route of the Aquind Interconnector:

Farlington Playing Fields

Bransbury Park

Baffins Milton Rovers

Langstone Harbour Sports

The University of Portsmouth

This is as a result of the simple facts of the geography of Portsmouth. Not only is it the second most densely populated city in the UK, but the majority of green spaces on which outdoor sporting facilities such as football pitches can be built are on the eastern side of the island, so any plan that involves digging a 23 metre wide trench from Eastney to Farlington for any purpose is going to have a direct affect on numerous sporting facilities and participants.

I note that the mitigation offered by the Applicant will not apply to Baffins Milton Rovers, on the grounds that the proposed works "will be undertaken works in this location during the summer (outside of the playing season)", which makes the following incorrect assumptions:

- Football players do not train in the summer
- Football facilities are not used for any other reasons in the summer (e.g. the Victorious Festival off-site camping hosted at Farlington Playing Fields)
- The timetable of works on this scale, including the realignment of pitches, can somehow be guaranteed to within a period of days, such that there will be no impact on any sporting fixtures
- The proposed realignment of pitches will have not have a negative impact on the quality of the playing surface or impact on the availability or enjoyment of the facilities

I further note that the mitigation offered by the Applicant will not apply to The University of Portsmouth facilities adjacent to the landfall of the proposed Interconnector at Langstone, on the grounds that "it is not open to the public", which makes the following incorrect assumptions that the University of Portsmouth students, staff and visiting teams:

- Are not members of the public
- Have access to alternative facilities nearby which are unaffected by the proposals
- Are somehow ineligible for mitigation for the loss of their facilities

All the above assumptions are wildly unreasonable and the proposed mitigation is woefully inadequate in relation to the full effects of the proposed DCO. Consequently the Applicant's proposals should be rejected entirely for not properly addressing the damage caused directly to these key sporting facilities.

It should also be noted that the facilities listed above only include those directly on the route, and not all those that would be affected, as the disruption, traffic chaos and pollution caused by the proposed works will clearly have a detrimental effect on users of every other facility in the city, from the fans attending Portsmouth FC matches at Fratton Park, to the families using the Moneyfields Sport & Social Club (both off Copnor Road), to the children attending the Priory School Tennis and 3D Astro Sports Centre on Fawcett Road to the service men and women using the forces sports facilities at HMS Temeraire to the swimmers, cyclists, gym users and participants in numerous other sports on offer at the Mountbatten Leisure Centre in Hilsea, to the university students, staff and public now using the world class sports facilities at the new Ravelin Sports Centre, all of which are within 2.5 miles of the route. Even this long list does not even take into account everyone involved in mass participation events such as the Great South Run, Portsmouth Triathlon and Race For Life or the huge number of walkers, wheelchair users, joggers, cyclists, open water swimmers, canoeists, rowers, paddle boarders, kite surfers and sailors of all ages and abilities regularly using the seafront at Eastney and Southsea to enhance their physical and mental health which would be affected by the programme of works proposed by the DCO.

Realistically, every single sports facility in Portsmouth and every single person participating or spectating will be affected by these proposals, which you should reject for the benefit of the health and wellbeing of the 218,300 residents of the city and [9 annual million visitors](#) to the city.

Fibre-optic surplus capacity

The applicant has consistently referred to the inclusion of a fibre-optic cable (FOC) within the Interconnector as "associated development". However, it is clear a telecommunications network on this scale is an entirely separate development that raises questions about the veracity of the Applicant and its overall suitability for leading infrastructure projects.

The HVDC cable has clearly been used as a "Trojan Horse" for the inclusion of commercial fibre optic cables for the Applicant's private profit without it being referred to in the original S35 Direction. Such a "shoehorning" of one project within the development consent process for another would be misleading and unlawful in this context, as these fibre optic cables are entirely unrelated to, and unnecessary for, the provision of the HVDC cable - in fact in their submission to the Inspectorate, Portsmouth City Council noted that "no other similar electricity cabling scheme has added such separate telecoms related cables".

The scale, in terms of capacity of data, of the FOC element of the DCO is quite astonishing. Compare it, for example, to the capacity of the Crosslake Cross Channel Fibre project connecting Slough and Paris scheduled to complete construction later this year which contains 96 fibre pairs, each providing over 20 Tbps of capacity throughput. The Applicant has published procurement details for "[Two circuits of... Fibre Optic Cables \(up to 192 Fibres, one per circuit\)](#)". Therefore, the Aquind FOC alone would be double the capacity of the most recent subsea communications network built between France and England.

The Applicant has attempted to justify the FOC network on the grounds that it was required for the "control and monitoring" of the HVDC cables, and that commercial use of the FOC's was restricted to any "spare capacity". This was highly misleading, as the analysis above shows that the vast majority of the capacity is not required for control and monitoring, which may even require only a single pair of the 192 FOC cables referred to in the Applicants [procurement document](#).

Despite the opportunity presented by the Examination and more recently, the [Request for Information](#), the Applicant has never stated specifically what amount (either in terms of overall data capacity or the number of pairs of FOC cables available) the "spare capacity" would represent. The clearest answer given to date was that "it is anticipated that approximately two thirds of the cabinets within the ORS will be available for commercial use" but even that statement does not have

sufficient clarity with regards to the volume of commercial data - for example are the proposed cabinets of equal size, bandwidth or number of FOC pairs? Is it not possible for the *number* of cabinets in use for the control and monitoring aspect to represent one third of the total number, but a much smaller proportion of the total data throughput?

The Applicant has never been clear on this aspect, and that raised further issues of transparency and fitness to provide an infrastructure project of national significance.

The sleight of hand required to shoehorn a massive commercial communications network into an HVDC cable project amounts to dishonest abuse of the Examination process and subsequent DCO submission by the Applicant, and is evidence of a devious "land grab" and a serious overreach of the original project.

In this context, surely the FOC aspect of the Interconnector cannot be interpreted as "Associated Development" when it is clearly a separate, and significant, commercial project in its own right and should be treated as such? The operation of a separate telecommunications network by the Applicant is not an NSIP, nor is it "Associated Development".

I trust that the Secretary of State will therefore refuse the DCO, on the grounds that the Applicant sought to mislead the Examination and undermine the planning process by massively understating the true capacity of the intended FOC network in comparison to the control and monitoring requirement. Furthermore the Applicant has avoided the direct question raised by

National and energy security issues

During the Examination by the Planning Inspectorate, Portsmouth City Council noted the risk that the Applicant will be unable to financially "protect [the local authority] in case the operator went into liquidation during construction." This speaks to the highly unusual nature of the ownership of Aquind Limited and its obscure funding sources. For several years Aquind Limited relied on funding from the British Virgin Islands (BVI), an offshore tax haven with no public register of company ownership, nor any visible financial details of such companies. The funding situation has recently changed, but is no more transparent, as a Luxembourg registered company owned by Viktor Mikhailovich Fedotov - Project Finance Group S.A. has bought shares issued by Aquind

Limited to the value of £17million, thereby financing just under half of the historical debts of the company which now amount to £38 million according to its most recently published accounts (which were submitted 2 weeks late on 13/7/21).

However, the ordinary (or voting) shares of the parent company of Aquind Limited - AQUIND Energy S.à r.l. - are not fully owned by Viktor Mikhailovich Fedotov. He only owns 50% of these, the remainder of which are owned by Energy Stream Investments S.à r.l which in turn is owned by prominent Conservative Party member Alexander Temerko. So one Russian born UK citizen owns half of the debt and half of the voting rights and another Ukrainian born UK citizen owns half of the voting rights but none of the debts, which were financed by sources unknown while the parent company was registered in the BVI.

Furthermore, Aquind Limited does not have, nor has it ever had, any trading income. It is in effect a shell company, owned entirely within a highly unusual ownership structure with many £millions of outstanding debt financed by unknown sources. Yet, it is financially able to donate £261,000 to the Conservative Party while being entirely broke. This seems to defy financial logic.

It is a matter of public record that Aquind and its directors have consistently supported the Conservative Party with donations over nearly 10 years, to a total of over £1.6 million. There is a pattern of making donations in advance of decisions being taken that would financially advantage the company and also donations to politicians with direct influence over those decisions.

This pattern started in 2012 when Aquind's predecessor business Offshore Group Newcastle (OGN) received a grant of £4.5million for a purpose-built facility to make steel foundations for wind farms from the Business Department's Regional Growth Fund. Electoral Commission records show that in the eight months before the grant was announced, OGN and one of its directors, Alexander Temerko, made donations totalling £49,905 to the Conservative Party. In the year that followed the grant, Mr Temerko and his company donated a further £298,250 to the party, but the facility was never built.

Alexander Temerko, who previously had a "prominent role in the Russian arms industry" (Guardian 13/11/19) has since boasted of supporting no less than 37

MP's while Aquind has made donations to numerous parliamentarians involved in the development. These include David Morris MP, who asked questions on behalf of Aquind in the Commons a month after receiving £10,000 from it, Lord Wharton, a Conservative peer, former MP and former Under Secretary of State is a paid Strategic Advisor to Aquind while former Business Secretary Alok Sharma and Anne-Marie Trevelyan Minister of State for Business, Energy and Clean Growth have both had to recuse themselves from the DCO process after taking donations from Aquind.

Even more worrying is the relationship between Aquind and Lubov Chernukhin, the wife of the former Russian deputy finance minister, Vladimir Chernukhin. Lubov Chernukhin is a former director of OGN Investment Partners, the offshore parent of Aquind registered in the BVI and the biggest female donor to the Conservative party in history (a total of £1.7 million). Through her husband, Mrs Chernukhin clearly has links to the Kremlin at the highest level. Taking together the continuous pattern of political donations to key personnel in the decision making process, the complex and obscure ownership structure of Aquind and its parent companies, its exceptionally weak financial position and the arms trading and Kremlin links of current and former directors, it is a matter of national security that the most careful due diligence is done on the company entrusted with control over two strategic assets - the HVDC Interconnector and commercial telecommunications network.

But Aquind has no history of delivering even the smallest of energy projects, let alone a sophisticated feat of cross channel engineering with a £1.1 billion budget and 5-7 year timescale - it simply has no experience at all. Entrusting a shell company with heavy debts, unknown sources of finance (aka "dark money"), highly concerning international connections, no trading history and no experience with such a project would simply be reckless.

The public has a right to be protected from glaring conflicts of interest such as this and from putting key infrastructure in the wrong hands - I trust the Secretary of State will not gamble with the country's future and will not allow the DCO for the sake of our national security.

Environmental and health issues

I am writing to you again to bring to your attention the many concerns I have about the company Aquind and their proposal to install a (High Voltage Direct Current marine and underground electric power link) between Normandy (France) to Lovedean (UK), joining our national grids. **I will refer to the Governments own proposal of a (10 point plan) throughout.**

Your (10 point plan).

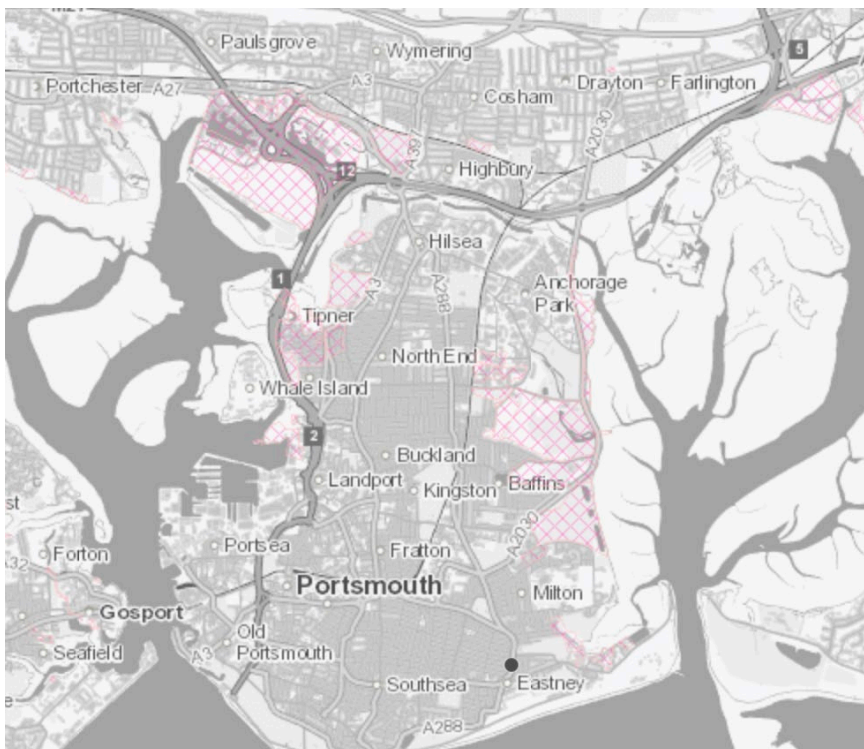
New and advanced nuclear power could deliver...		
A large-scale nuclear power plant will support a peak of around 10,000 jobs during construction	Government support could unlock significant private investment, up to £300m for development of small modular reactors alone	Each GW of nuclear power generation is enough to power 2 million homes with clean electricity
So why from a nuclear power station in France?	So why from a nuclear power station in France?	So why from a nuclear power station in France?

1 (b)

The landfall of the cable will be at Eastney in Portsmouth (UK)

The cable is intended to take a north bound route hollowing through, historical landfill known to contain (Asbestos), Under the Town and Country Planning (General Development Procedure) Order 1995, planning authorities have to consult with the (Environment Agency) to develop land

within (250) meters of landfill sites, including any land that has been used as a landfill site within the last 30 years or likely to be used as one in the near future. The area in and around where the cable is going is a great concern of mine for this reason. This project doesn't need planning permission from (local authority) as deemed a (project of national significance). It is a daunting probability that whilst this project is going ahead, disturbing extremely dangerous substances that are in the ground will be released, detrimental to all those in and around the city of Portsmouth.



The areas in pink, are historical landfill sites.

Some are known to contain asbestos.

All forms of asbestos fibres are hazardous as they can induce cancer following inhalation exposure, but amphibole forms of asbestos (including blue and brown) are more hazardous to health than chrysotile (white).

Breathing in high concentrations of asbestos for a long period of time mainly affects the lungs, causing a disease called asbestosis where breathing becomes difficult and the heart enlarges. Asbestosis may take decades to develop. Asbestosis sufferers are at an increased risk of

cancer. Exposure to lower concentrations of asbestos over time may result in a general (diffuse pleural thickening) or localised (pleural plaques) thickening of the lung lining.

2. Established allotments We are going through uncertain times, climate change, Brexit, a pandemic etc, disrupting plots of land where seasonal produce is grown, that we not only as (locally or nationally but globally) should be encouraging, is going against the Governments own '10 point plan' (Point 9) being the objective here. The lack of clarity and consultation with the community of allotment holders, has caused anxiety and is unacceptable with regards to Aquind and their senior management.

3. The Locks, Langstone shore and Milton Common this is one of Portsmouth's only areas of natural biodiversity where, hundreds of natural habitats for many species of wild-life and marine-life, two being **The Brent Goose and the Great Crested Newt, both protected species under The Wildlife and Countryside Act 1981.**

The site is a very large area of grassland, scrub and ponds located on the edge of Langstone Harbour, on the Eastern side of Portsmouth. The site is reclaimed intertidal land from around 40 years ago. The grassland present ranges from amenity to rough sward. The rough grassland has developed a wide diversity of species, with a strong coastal element. There is extensive dense and scattered scrub throughout the site, especially to the east. There are three ponds present, which provide some stands of swamp. The coastal edge of the site supports salt-marsh vegetation. Overall the species diversity is excellent, with nearly 200 species noted within the common. These include 3 acid/neutral grassland indicators and the Nationally Rare *Bupleurum tenuissimum* and *Lathyrus aphaca*, the Nationally Scarce *Medicago polymorpha*, and the County Scarce *Smyrniolum olusatrum* and *Linum bienne*. \

I refer to the 10 point plan again. (Point 9) **The natural environment is one of the most important and effective solutions we have for capturing and sequestering carbon long-term. We will safeguard our**

cherished landscapes, restore habitats for wildlife in order to combat biodiversity loss and adapt to climate change, all whilst creating green jobs.

4. The route of the cable carries on up through **Eastern Road**, one of the three main arteries in and out of Portsmouth, disruption to this road would be indeed sheer chaos. I'd also like to point out that Portsmouth is outside of London, the most densely populated city. The city is already at an alarming pollution level, (DEFRA is currently providing extensive direction, guidance and support to PCC, requiring them to develop local action plans and to benchmark these against the Clean Air Zone (CAZ) Framework for England published in 2017. The support provided includes funding to enable them to help take the necessary action to improve AQ whilst minimising the impact of these plans on individuals and businesses. Therefore, to pin point Portsmouth as the city to be subjected to disruption on one of the busiest roads in and out, would cause an enormous amount of congestion and force traffic elsewhere to find other routes. Portsmouth has numerous hot spots of high air pollution, to force even more traffic through any area for even a limited amount of time, is detrimental to people's health.

The health impacts of air pollution

The health effects of pollutants suspended in the air will depend on many factors as to the level of harm an individual is exposed to. This includes the dose, duration, how an individual comes into contact with the pollutant, in addition to factors such as age, sex, diet, family traits, lifestyle and state of health.

Air pollution can affect the eyes, nose and throat, the heart and associated blood vessels and the lungs and respiratory system. Short-term exposure (over hours or days) can lead to a range of health impacts including lung

function, coughing, wheezing and shortness of breath, exacerbation of asthma, increases in respiratory and cardiovascular hospital admissions and mortality. Over long timescales (years or lifetimes) exposure can lead to reduced life expectancy, due to cardiovascular diseases, respiratory diseases, and lung cancer. More recent research has associated air pollution with affecting the brain causing dementia and cognitive decline; diabetes and affecting early life leading to various birth outcomes, for example, low birth weight and developmental problems.

I ask you to consider my concerns about the 'necessity of the cable', the land fall of the cable, and the proposed route of the cable.

Economy, Tourism and Ferry Port

800 years of being at the forefront of world history, the most fortified harbour in the world in the 1800's, almost every family household losing a male relative in the navy during WW1.

Our Island endured 67 air raids during WW2 taking 930 civilian lives and 2,837 civilians seriously injured, 63,000 residential properties destroyed, 30 churches, 1 hospital destroyed and 1 seriously damaged. 3 cinemas, 1 theatre, 8 schools and all the principal shopping areas were obliterated. Our architecture has never recovered.

Tourism is a big part of our economy. We market ourselves as the Great Waterfront City, with world-class attractions, fantastic things to do and a year-round programme of events. We are UK's only island city, and promote visitors to explore our miles of coastline and centuries of history. We are investing in accommodation with the first 5 Star hotel in Eastney to be opened to cater for prestigious events such as the Americas Cup, Victorious, and the Great South Run to boost our economy. Their projected profits will need to be reviewed if this ruinous project goes ahead.

Cruise liners visiting our city have increased over the past years and we are hoping for more. One of the attractions are the city tours by coach. The gridlock of the city will render this impossible during the months of disruption and will be very bleak vista on the eastern side of the City for decades to come, without the trees that will have been destroyed. This will be a consideration for cruise companies and we will lose revenue as a result.

The Historic Dockyard worth £110.40 million a year (2019 figures) with 850,000 visitors will be affected as the negative press of our gridlocked and polluted city will put off visitors during the destruction and for years to come.

The ferry port with 2.06 million passengers to 8 different destinations with a ferry crossings every 45 mins (34 crossings a day) will be reduced due to this project and the implications of increased traffic and associated reduction of air quality that will be broadcast far and wide. This will be a consideration for passengers who will take their embarkation to other ports.

The container port whose profit increased by 1.6 million in 2018 from the previous year will be affected as the ensuing traffic will encourage haulage firms to go to other ports.

Whoever were our enemies through the centuries of our rich history, none compares to the pernicious actions of Aquind who has no ideology except to make money using Portsmouth and its people as collateral.

Environmental and Transport considerations

I am writing with the soul intent of expressing my heartfelt objection to Aquind's intended vandalization of the beautiful city I live in.

Portsmouth is a small island, approximately 24.5 Km Sq. The second most congested city in the UK after London. This small the island of Portsmouth contains approximately 93,000 households. The inhabitants for statistical purposes are broken down into various groups. The 3 groups I would like to bring to your attention are; Under 19s, 52,200; 65 and over 13,800; Limiting Long Term Illness 3,400. This sum total of 79,800 is the number of people that are classed as vulnerable in relation to Health.

Also on this island we have an International Ferry Port with Cruise Ship berthing, essential shipping routes to the Channel Island, plus regular shipping to France and Spain 2 major Industrial Estates, Ferry and Hover routes to the Isle of Wight. Oh I mustn't forget Portsmouth Football Clubs home ground Fratton Park.

Despite the ravages of Covid, last year, 2020, Portsmouth recorded 0.65 Billion road miles travelled within the city limits. Portsmouth exists through its land and sea accessibility. I have sited the sea access points. There are 3 roads that can access Portsmouth. Just 3!. The same route out as in! This is for cars, buses and HGV's.

This amount of traffic in such a condensed area has created air quality of a dangerous level. DEFRA's 2019 PM25 reading was the highest reading of Nitrogen dioxide outside of London. Portsmouth City Council realised there was a risk to health. The Government responded by setting the council the task of reducing this level of pollution by creating a Clean Air Zone, the plan is for Congestion Charging to come in force before the end of this year. The infrastructure for this is in the process of being put in place now.

Aquind's proposal is to bring in electric supply cables from France to the south east corner of Portsmouth. They propose to cut a trench along the eastern side of the island, cutting across wildlife preserves, open green spaces and then cutting into Portsmouth's third arterial road!! Block off one of only two lanes southbound on the eastern side of the island, and this for an undefined period of time. That is one of the major routes for supporters driving to and exiting from Fratton Park on a match days ie. Saturday and one evening a week. At weekends this number is further enlarged by visitors to Gunwharf, the number one destination, Nationally, for shopping as recommended by Trip Advisor.

Whenever Portsmouth traffic is deprived of one lane of traffic ie. RTA or road works, whether it be road in or out of the city, total gridlock occurs, even if the obstruction is only for a short period of time, say 3 hours. Absolute gridlock. Cars, buses, HGVs sat there with their engines running. Pollution levels go through the roof. To add to those woes, Aquind plan to have a continual flow of trucks travelling in and out of the city through the Eastern Road, the road where they have blocked a lane off!

I think you get the picture. The Government on the one hand, is stating that Portsmouth MUST create a clean air zone, because they are worried about every ones' health, especially the 78,000 as a vulnerable group, and on the other hand they are seriously considering approving this project? It's like issuing steel toe cap safety boots and then drilling straight through the steel toe cap into your own foot!!

It does not add up. It does not make sense. It is harmful for the residents of my city.

For this reason alone you MUST NOT APPROVE this project.

Very briefly, the other considerations are:

The UK being held to ransom by a foreign country, by withholding electricity supplies for political reasons.

The effects to Portsmouth's wild life reserves and essential green spaces being decimated.

The risk to health by digging up old landfill sites containing asbestos.

The government turned down Huawei's offer of installing a new super modern communications facility. It was turned down primarily on the grounds that it was a security risk. Yet you are considering approving a similar proposal from a company of dubious structure and financial stability, headed by Ex- Putin employees.

This coupled with cash donations to the Conservative party and individual Ministers does not sit well with the public at the moment. Neither does Mr Kwarteng's PERSONAL endorsement of this project from the onset.

Our counterparts in France have had a resounding success with all the effected Mayors/Prefects returning a resounding "Non a Aquind!"

And finally, the decision to make this a project of National Significance, thereby taking any involvement away from Portsmouth City Council (especially as it had been turned down before when applied for in Europe) and the fact that Aquind are pressing for a speeding up of OUR(UK) processes for their ends, raises further questions.

Local democracy ignored. Lack of due diligence in the NSIP application process.

As a Portsmouth resident, one of my main objections to Aquind's unnecessary and damaging Interconnector project is the way in which the decision was taken from Portsmouth City Council and given to central government when the scheme was given Nationally Significant Infrastructure Project status. I understand the Nautilus Interconnector was also considered a NSIP. However, that project differs from Aquind's in many respects, one being that the electricity will come from offshore wind, whereas Aquind's source is nuclear energy from France. This surely means that Nautilus is more in line with the government's own policies on green energy?

I and countless others who will have to live with the consequences of this ill-conceived project for years to come have no say in it. Both our MPs, the Leader of the city council and every single councillor are opposed to it; local politicians of all parties are united on this issue. The French are equally opposed to it.

Why were the other four exiting interconnectors not granted the same status? Why was Aquind's scheme not given this status from the start? Did it have anything to do with the private meeting on the House of Commons Terrace in 2018 between then Energy Minister Claire Perry-O'Neill and Aquind's co-owner Alexander Temerko? The Department for Business, Energy and Industrial Strategy announced a month later that the Aquind Interconnector would be considered a NSIP.

At that time Mr Temerko had donated £1.3m to the Conservative Party. Today it is closer to £1.7m. Viktor Fedotov, the other co-owner of Aquind, has also donated in the region of £500,000 to the government. This is well documented in the Press. Are we in Portsmouth expected to believe these events are not connected? Please see attached links.

<https://www.thetimes.co.uk/article/energy-minister-met-russian-donor-alexander-temerko-despite-warnings-of-trap-jwsltlb9b>

Russian influence in UK under the spotlight - CNN Video

<https://edition.cnn.com/videos/world/2020/08/11/uk-russia-report-influence-robertson-pkg-intl-ldn-vpx.cnn>

The fibre optic cable, which was added after Aquind's original submission, is of such huge capacity that it rivals all other data cables crossing the channel. It clearly suggests that the applicant intends to operate a telecommunication system which will be sold off to third parties, surely infringing upon NSIP status?

There are still many questions to be answered about the awarding of NSIP status to this project. We followed carefully the communication process between applicant and BEIS which suggests that some documents are missing from the PINs library. We think this may have led to the inclusion of the words ... "together with any associated development" This surely has allowed too much freedom to the applicant.

Thank you for taking the time to read our document. We trust this will focus your attention on the issues which are of grave concern to us, members of LSA. You will recognise that this small representation does not do justice to the 3600 members of our grassroots campaign. There are many many more

residents of Portsmouth and beyond who are very worried that you will ignore their needs and grant the applicant a DCO. Please take notice of what we have shared with you! STOP AQUIND.

Viola Langley

Let's Stop Aquind