

From: [REDACTED]
To: [Aquind Interconnector](#)
Subject: Submission to deadline 31.3.2023 Aquind Interconnector
Date: 09 March 2023 10:44:29
Attachments: [submission_31.3.2023finalV.docx](#)

Please find my submission for the deadline 31.3.2023 attached.

Could you please confirm you received this.

Regards,
Viola Langley

I am writing to you today to express my deepest concern about the Aquind Interconnector project.

I entirely agree with the previous SoS', Kwasi Kwarteng's, decision when he refused the DCO for the

project in January 2022. I took part in the examination process in 2020 and sent my submission to

the Planning Inspectorate and participated in the Open Hearing twice. I have been studying the published documents to the best of my best ability and have come to the conclusion that at the end

of the examination process there were many issues unresolved and questions unanswered.

Because

of this the SoS had to delay his decision on 3 occasions.

Now in 2023, 3 years after the examination, should we not re-examine these disputed issues?

Many

Interested Parties were added to the Book of Reference during the examination process in 2020 and

since then many changes have occurred. Will the new SoS inform all Interested Parties in this process of re-determining the outcome of the Development Consent Order? Have not all Interested

Parties the right to participate in this current process?

I would like to direct the SoS to a possible material fault in the documents on which Judge Lieven based her decision in the High Court.

In the recommendation to the SoS by the planning inspectorate the landfall in France is clearly

marked as being near le Havre in the Baie de la Seine. At the Judicial review in November 2022

Judge Lieven reiterates this in Fact 9 of the judgement "These factors, amongst others, led to a location near Le Havre for the landfall in France."

The landfall near le Havre may have been planned during the early stages of the project – say

2015. However, by the time of the examination in 2020 /2021 this landfall had been changed to

a location near Dieppe (Hautot sur Mer, Bonneville, Barnabos).

This fundamentally influences the mindset of any analyst of this project, falsely directing attention more to the West.

Justice Lieven points out “Two important considerations in the planning of the scheme were the cost of the cable, and therefore the desirability of minimising length; and the need to minimise the crossing of busy shipping lanes.”

In view of the fact that the would-be departure point of the Interconnector cable point from France is near Dieppe, the direct and shortest distance to a suitable connection point in England is at Ninfield (near Bexhill on Sea).

The diagram purporting to show the limits of suitable locations on the South Coast appears to be totally misleading. However, this evidence was used and accepted as correct in the examination process. A correct representation of available and suitable locations for connections would have included the coast line of France and parabolas centred around Dieppe. Any analyst shown the original misleading diagram then shown what I suggest would have been an accurate and not misleading diagram would have concluded that the original selection of 10 substations from Chickerell in the West and Bolney in the East was incorrect. A correct diagram would show that Ninfield and Dungeness and perhaps others to the east should have been included in their scoping process.

Why does it matter that this diagram is so misleading? Why does the company want to come through Portsmouth? Why are we told that Lovedean is the best option when all other substations need upgrading as well? I have raised these questions in my submissions in 2020/21.

A document “SO submissions to Cap and Floor” June 2017, page 25 published by National Grid included Ninfield amongst 12 other possible substations.

https://www.ofgem.gov.uk/sites/default/files/docs/2018/01/nget_report_to_ofgem_-_quantified_interconnector_impacts.pdf

In 2017, then, Ninfield was considered suitable for use as a connection point to the grid for

Aquind Interconnector. When asked to consider Ninfield as an alternative to Lovedean, we are repeatedly told by Aquind's agents that Ninfield is not suitable. In view of the fact that the communication between Aquind and NG has never been placed into the public domain, is it reasonable to ask whether a re-assessment of Ninfield's suitability is now due?

The judge at the High Court Hearing highlighted the fact that the feasibility study by NGET had not been seen and the claimant "Aquind" provided the information through the development consent process.

"In December 2014 the Claimant requested National Grid Electricity Transmission ("NGET") to undertake a Feasibility Study of potential connections to the National Grid for the Claimant's proposed interconnector. The NGET Feasibility Study has been treated as confidential throughout the process and neither the Defendant nor the Court has seen it. Information about the Feasibility Study was subsequently given by the Claimant through the development consent process."

There was no independent method to check the veracity of Aquind's claims that issues related to the point of connection to National Grid were correctly resolved.

Ninfield, a substation only 4.3 miles from the landfall, a place not densely populated, much less environmentally destructive seems to be a better option than Portsmouth, the most densely populated city outside London.

Why was this feasibility study not transparent and available, why was it dealt with confidentially?

Why has neither the SoS nor the court seen this feasibility study?

Why was the Ninfield substation alternative not fully investigated?

The SoS concentrated on Mannington as a feasible alternative, and this might be still an option but Ninfield seems to be the logical alternative, shortest crossing over channel, shortest length of cable to minimise costs. In my opinion this alternative should be seriously investigated at this time. NPS EN-1 sets out the way in which OTHER ALTERNATIVES not included in the Applicant's application could be material in the decision to grant/refuse consent, specifically if there are harms caused by the development which is the case with Aquind Interconnector. Could this not be the very reason sought by the SoS to show that the Law allows refusal of Aquind Interconnector?

Environmental impacts of this project for Portsmouth and along the route to Lovedean are enormous. Both MPs of Portsmouth, Portsmouth City Council and the residents have expressed their great concerns and highlighted numerous issues which have been downplayed by the ExA. The SoS in his letter to refuse the DCO recognises that "adverse effects outweigh the benefits".

The destruction to the marine environment, our green spaces, parks, the allotments, playing fields etc is untold. This project would mean nothing but destruction and damage to the city of Portsmouth and beyond.

Aquind proposes to use HDD to drill under the allotments after realisation that PCC and residents fought vehemently to prevent their gardens being dug up. Yet this drilling process uses bentonite and other chemicals which could have a harmful effect on the soil and environment. Inadvertent releases are possible and would have a huge impact on the allotments. We are told that allotment holders would be able to be on site during the works and this would be safe. Is this the case? One only needs to look at pictures of inadvertent releases easily available on the internet to understand the impacts. One allotment holder refers to problems when drilling for repair works to drainage pipes. As the allotment grounds contain high levels of clay, the ground needed to be frozen and access to the allotment was denied. Possible loss of even more green spaces than anticipated. What about wildlife habitats on the allotments? The allotments are home to many rare species, slow worms, great crested newts, hedgehogs, foxes, a huge variety of birds and insects.

Milton Nature Reserve, looked after by the Hampshire and Isle of Wight Wildlife Trust is on the proposed route. One of the few green tranquil places in Portsmouth would be affected. Today, in 2023, we are all aware of climate change and the huge biodiversity crisis we are facing. Can we afford that a project of this kind could accelerate the harm to our environment profoundly? Farlington Marshes, another Hampshire and Isle of Wight Wildlife Trust site, will be exposed to the nearby works. What effect will the noise, vibration and pollution have on the species of birds, insects and plants? Mitigation is not an option.

Milton Common, a recreational green space in Portsmouth, loved and visited daily by many people is built on a landfill. Asbestos and mercury are some of the waste materials buried on and around Milton Common.

One documentary shows the evacuation of Lumsden Road, built on a landfill adjacent to the route, in 1991 and highlights that these materials must not be disturbed. What are the potential health risks? This issue has been raised during the examination process in 2020, the video documentary supplied was rejected. The relevant maps showing contaminated areas of asbestos are with the ExA.

How can mitigation resolve this issue? Habitats and Wildlife are under threat. This could have unthinkable consequences for the health of residents living along Milton Common.

Bransbury Park another cherished recreational area for children, dog walkers and residents. The proposed trenches cut right through the skate Park and one of the main paths.

The playing fields and part of the University campus on Milton Common will be inaccessible during construction time which will have an impact on their physical and mental well-being.

Air pollution in Portsmouth is very high (16th worst polluted city in the UK) . PCC had to introduce a clean air zone to combat this problem. The construction works could cause an even higher level of pollution, gridlock and congestion. Portsmouth is an island with only three access Roads. The trenches along Eastern Road would be very wide which means parts of Eastern Road (at least one lane) would be closed for vehicles for a considerable time.

How could the ambulance service stationed on Eastern Road supply the service needed when faced with congestion and gridlock?

The interference of the Aquind Interconnector with the sea defence work has been recognised by the SoS and is of great importance for Portsmouth. The priority is to prevent Portsmouth from flooding with the danger of rising sea levels, NOT to rip up one of the busiest roads of Portsmouth for an unwanted and damaging project .

The mental and physical impacts on people's health are undeniable, many people expressed their concern, fears and anxieties clearly, in the Open hearing and in their submissions during the examination process.

At this point, we need to remind the new SoS of the consultation process before the examination process started. Many residents felt that the consultation process was very poor and did not inform the residents well enough to respond to the proposal in time.

Aquind claims that this Interconnector would provide cheaper and cleaner energy. The company asks for exemption and at current times, nobody can give any guarantee about future energy prices or availability. Is nuclear energy green? This is debatable. France is having huge problems within their own energy sector. This winter many nuclear power plants had to be shut down for maintenance and other reasons. Is France able to provide the required, much wanted energy to the UK?

Brexit had an enormous impact on Aquind, it lost its PCI status, therefore the European demand for this Interconnector is questionable. France does not want or need the Aquind

Interconnector. The Prefet and mayors of the surrounding villages of the local area rejected the project. They are as determined as we are- Aquind Interconnector will not be built.

Why would you grant Development Consent Order (DCO) if France refuses this project?

The French residents made us aware of the health implications of Electromagnetic Field Emissions. No study has yet been found to show that there are no effects on people's health. On the English side, it is documented by an Interested Party that his wife might suffer by living in close proximity to a high Voltage cable. Should these high voltage cable be so near to residents' houses? What health implications could this have?

The data Telecommunication cable was and is a contentious issue within the DCO for the Aquind Interconnector. Should an energy project include a superfast telecommunication cable? Is this project not the only interconnector to have been treated as an NSIP (Nationally Significant Infrastructure Project) ? Is it legal to include a data cable? Is Aquind allowed to build a Telecommunication system?

Both MPs of Portsmouth described the Aquind Interconnector as a " Threat to our National Security". Is this really the case? If so, should this project not be refused?

The inclusion of this data cable according to Aquind would need two Optical Regeneration Stations, two at Fort Cumberland and two at Lovedean. The ORS at Fort Cumberland would reduce the car park dramatically, when parking space comes at a premium in Portsmouth.

The ownership of Aquind is an opaque issue.

Inspection of Companies' House records reveals that Aquind is a private Limited company with two owners. The Public Face of Aquind is Alexander Termerko, a long-term donor to the Conservative Party. Between them, Aquind and A. Termerko have donated at least £ 1.4 million to 34 MPs.

Could this be seen as cronyism seeking to influence the outcome?

Two ministers had to recuse themselves from this project because they got to " near" to the applicant.

Can we trust this company with an important project like this?

This Interconnector is not needed , not wanted and will do great harm to our city of Portsmouth and beyond. We should focus on producing sustainable renewable energy in the UK, which will strengthen our resilience and independence.

The previous SoS, Kwasi Kwarteng came to the right conclusion and I hope sincerely that you will do the same . The DCO for the Aquind Interconnector MUST be refused.

Viola Langley

Sent from [Mail](#) for Windows