

Atkins, Caelan

From: Janet <[REDACTED]>
Sent: 30 March 2023 14:02
To: Aquind Interconnector
Cc: [REDACTED]; [REDACTED]; [REDACTED];
Vernon-Jackson, Gerald (Cllr); Pitt, Steve (Cllr); Barrett, Kimberly (Cllr);
[REDACTED] Sanders, Darren (Cllr); 'Lynne Stagg (Cllr)';
[REDACTED] Paula Ann Savage
Subject: AQUIND Interconnector:- National Infrastructure Project
Categories: Consultation Response

AQUIND Interconnector Team

Unique Reference 20025182

We in Portsmouth's Milton Neighbourhood Forum are opposed to the AQUIND Project.

The Neighbourhood Planning Forum previously wrote to you as an "Interested Party", the last time being 16th November 2021. We were subsequently notified by you of the Secretary of State's Decision Letter of 20th January 2022, referenced EN02002, to refuse the application.

The High Court Judgement of 24th January 2023 rejected the Sec of State's Decision. It was largely based on the SoS's failure to recognise that requesting a review of an alternative Substation site at Mannington had been made without due consideration of its capacity.

It's not easy to understand from the documentation what the capacity issue is or was. However, and more importantly, why the "Alternatives" for landfall consideration were reduced to an area from Weymouth to Bognor Regis.

The Environmental Statement (Vol 1 Chapter 2 "Consideration of Alternatives" p8) shows an arc from Pevensey Bay in East Sussex, northwards beyond Basingstoke, to Chesil Beach in the west. This arc is seen as "suitable" to appraise for connection points and acceptable to NGET. The arc misses entirely the Ninfield Converter Station in East Sussex. This is only four miles off the coast from Bexhill-On-Sea. It has a direct road link thereto. Bexhill is 7 miles from Pevensey. Ninfield is about seven miles from the arc.

In giving significant weight to the SoS's misunderstanding of Mannington's capacity or otherwise, the High Court has been distracted from the real issue. The real issue is that undersea cables are extremely expensive to service and maintain. AQUIND's case is that reducing cable lengths, both undersea and underground, will be critical to financial viability. All the proposed Converter Stations require upgrades to accommodate the new connection.

The real question should be:- *"Why is the Ninfield Converter Station ignored if the route across the Channel to Bexhill or nearby, is so much shorter?"*

The next question should be *"Why has a landfall option in Portsmouth been selected at all if the route to a Converter Station at Lovedean from the City is so obviously disruptive?"*

The applicant could have opted for a far easier and less disruptive route by using the former Hayling Island to Havant railway link, now a combined foot/cycle path and bridleway. Land and seabed adjacent to it had in the past, been used as an overhead Electricity cable route. Rights may still exist. The Public Right of Way is sufficiently wide to accommodate plant and machinery equipment. The cable installation would be quicker and easier to maintain than under a public highway.

Using Portsmouth as a Landfall option has never been acceptable because of the huge social disruption and otherwise unnecessary environmental harm. Disruption and damage to the most densely populated City in the UK is entirely avoidable. Portsmouth City Council had proposed the Hayling trail as a feasible alternative in their submissions of 19th February 2020 and 30 September 2021, They have fully expressed the difficulties with Portsmouth also.

The rejection of Hayling Island seems to be based on difficulties around crossing a causeway to the Hampshire Mainland. That same requirement is also necessary from Portsmouth. The difference between Hayling Island to Lovedean and Portsmouth to Lovedean is so similar as to be insignificant. Compared to the distance between the French Coast and Ninfield, and the French Coast and Lovedean; the difference is vast.

It is also unacceptable to conceal within the Project, a secondary function to accommodate data cabling. It's a function not dependent on the Project's primary purpose. The Development Consent Order is for Energy Security. Data cabling for commercial export is irrelevant to energy security. The application is being misused.

The true motives of the applicant are questionable.

AQUIND's case for using Portsmouth seems to have shifted towards the time it has taken to get to this stage using time as a threat to the Project's viability. However, it was entirely within the gift of the AQUIND Project Team to have chosen an easier option and thereby achieve an earlier consent.

Increasing the UK's Energy Security may be justified on grounds of the "common good", but where is the cost/benefit analysis consistent with the Treasury Green book guidance in choosing Portsmouth over Bexhill, or Ninfield over Lovedean?

This Project seems to be seeking State approval on unacceptable grounds. Doing so in the context of private donations to Party Members within Government, is also unacceptable.

The application should be **REFUSED**.

Rod Bailey, Chair of Milton Neighbourhood Planning Group &
Martin Silman, Chair of Milton Neighbourhood Forum

Representing the 14,000 residents of Milton, Portsmouth
With the full support & approval of all 6 Ward Councillors:-
Cllr. Gerald Vernon Jackson CBE
Cllr. Steve Pitt
Cllr. Kimberley Barrett
Cllr. Abdul Kadir
Cllr. Darren Sanders
Cllr. Lynne Stagg

30th March 2023