

**RESPONSE TO THE SECRETARY OF STATE FOR ENERGY SECURITY AND NET ZERO'S REQUEST FOR INFORMATION AND UPDATES (DATED 3/3/23) FROM DAVID LANGLEY**

**NOTE TO THE PLANNING INSPECTORATE – THIS IS ALL NEW INFORMATION AND RESEARCH NOT PREVIOUSLY SUBMITTED**

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## CONSIDERATION OF ALTERNATIVES

### Why Ninfield should be considered as a genuine landfall option

NPS-EN1 is very clear about the issue of alternatives, as pointed out by the Planning Inspectorate’s Recommendation Report. Point 5.4.5 of the Recommendation report states:

*“Alternatives that are not among the alternatives studied by the Applicant, as reflected in the ES, should only be considered if they are believed to be important and relevant to the decision. If an application gives rise to adverse impacts, alternative options could be important and relevant considerations.”*

Ninfield Substation (North East of Bexhill on Sea) is such an alternative. It was not forwarded by the Applicant for consideration by the Planning Inspectorate. The reason it was excluded by the Applicant remains a mystery. It offers a much shorter sub-sea route (about two thirds of the distance of the proposed route), and once ashore a distance one third that of the distance proposed for connection at Lovedean.

**In short, for a project continually stressing the need for the shortest, most effective and suitable route to be used, the omission of Ninfield defies logic.**

### 7.2 Methodology

As reactive power is a local problem in its nature, the voltage studies only focus on the local areas where the interconnectors are to be connected. Table 10 lists four studying areas and corresponding substations (all substations within a two-substation range of the connection points) to be considered in the following studies.

Studying Area	Area 1	Area 2	Area 3	Area 4
<b>Interconnectors</b>	<b>Gridlink</b>	<b>Neu Connect</b>	<b>North Connect</b>	<b>Aquind/OGN</b>
<b>Connection Points</b>	Kingsnorth	Grain	Peterhead	Lovedean
	Tilbury	Tilbury	Kintore	Fleet
	Grain	Kingsnorth	Blackhillock	Bramley
	Singlewell	Kemsley	Persley	Botley Wood
	Northfleet East	Singlewell	Craigiebuckler	Chilling
	Barking	Northfleet East	Keith	Fawley
<b>Substations in the local areas</b>	Littlebrook	Littlebrook	Tealing	Marchwood
	Coryton South	Coryton South	Kincardine	Nursling
	Ryleigh Main	Ryleigh Main	Knocknagael	Mannington
	Warley	Warley		Chickerell
	Kemsley	Rowdown		Bolney
		Cleve Hill		Ninfield
		Canterbury		

**Table 10: Definition of studying areas for the interconnectors proposed**

Ninfield is included in the above list of substations offering possible connections points for the Aquind Interconnector (amongst others) published by National Grid ([SO Submission to Cap and Floor](#)). The document, in which this list was published (on page 25), dates from 2017 and concerns technical matters which relate to Aquind and other interconnectors. This inclusion infers that Ninfield is capable of and may be impacted by connection to Aquind Interconnector. If this is the case in 2017, why was Ninfield not considered at an earlier

stage of the Applicant's optioneering. Why has it disappeared off the radar?

When one considers the location of the landfall in Normandy, near Dieppe, the mystery of not even offering Ninfield for consideration becomes more baffling. Bexhill is the nearest point of Southern England to Dieppe. The cable length would be much shorter. Why not investigate Ninfield?

In fact, Aquind has responded to this suggestion at an earlier date by referring to advice from National Grid. They say that the additional power load by connection to Aquind connector at Ninfield could not be evacuated from the substation. That is why substations need to be upgraded along the length of the South East 400kv line. Ninfield would of course need reinforcing and yes, it would cost money. But the reductions in on-shore, and particularly off-shore, cable length would represent a huge cost saving to the Applicant.

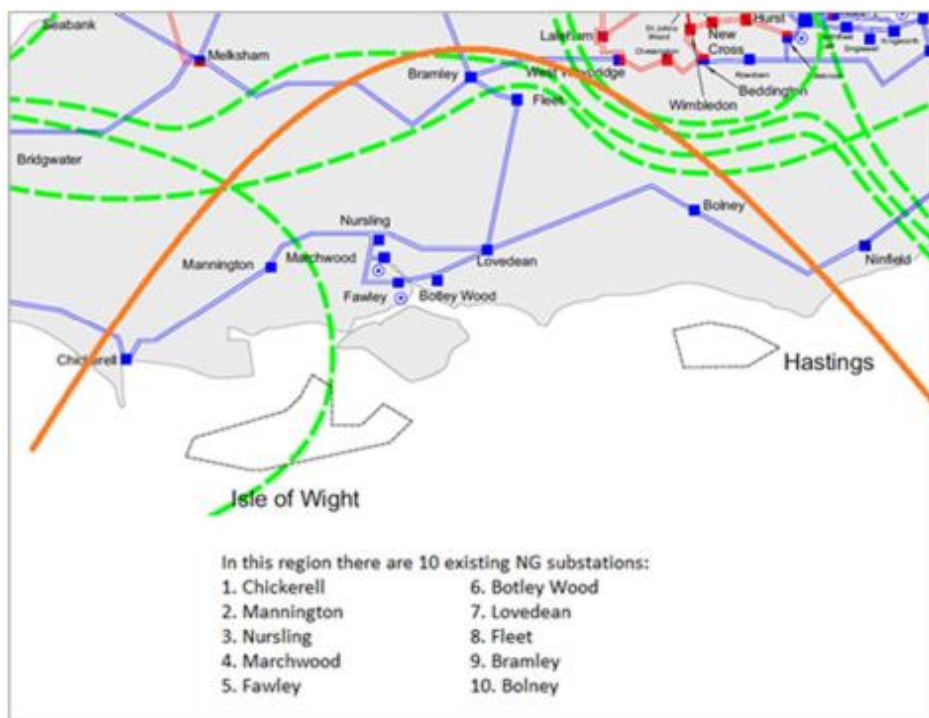
However, it would appear that Lovedean, near Portsmouth, has been Aquind's target from the inception of the project. When Mannington was freed from the Navitus connection obligation, Aquind did not feel it necessary or perhaps desirable to investigate the possibility of connection there. In the Royal Court of Justice, in November 2022, Aquind's barrister called Mannington "a dead duck". Mannington was disregarded from 2015/2016 even though it became "live" as soon as the connection to Navitus windfarm was revoked.

**How misleading material presented by the Applicant has restricted the range of options under consideration**

We submit that Aquind has continually guided/pressed us all to accept a connection at Lovedean by way of Eastney and a route through Portsmouth. We suggest that misleading material was used to prevent us from appreciating the illogical disregarding of alternatives other than those presented by Aquind. Our attention was fixed on Lovedean as was Aquind's. We were consistently guided towards Lovedean by the Applicant's visual material.

In particular, we are referring to the diagram below, which is repeatedly used to illustrate the limit of the availability and suitability of connection points to the National Grid on the

south coast of England.



**Plate 2.2 - England South Coast Map showing the region and ten connection sites identified**

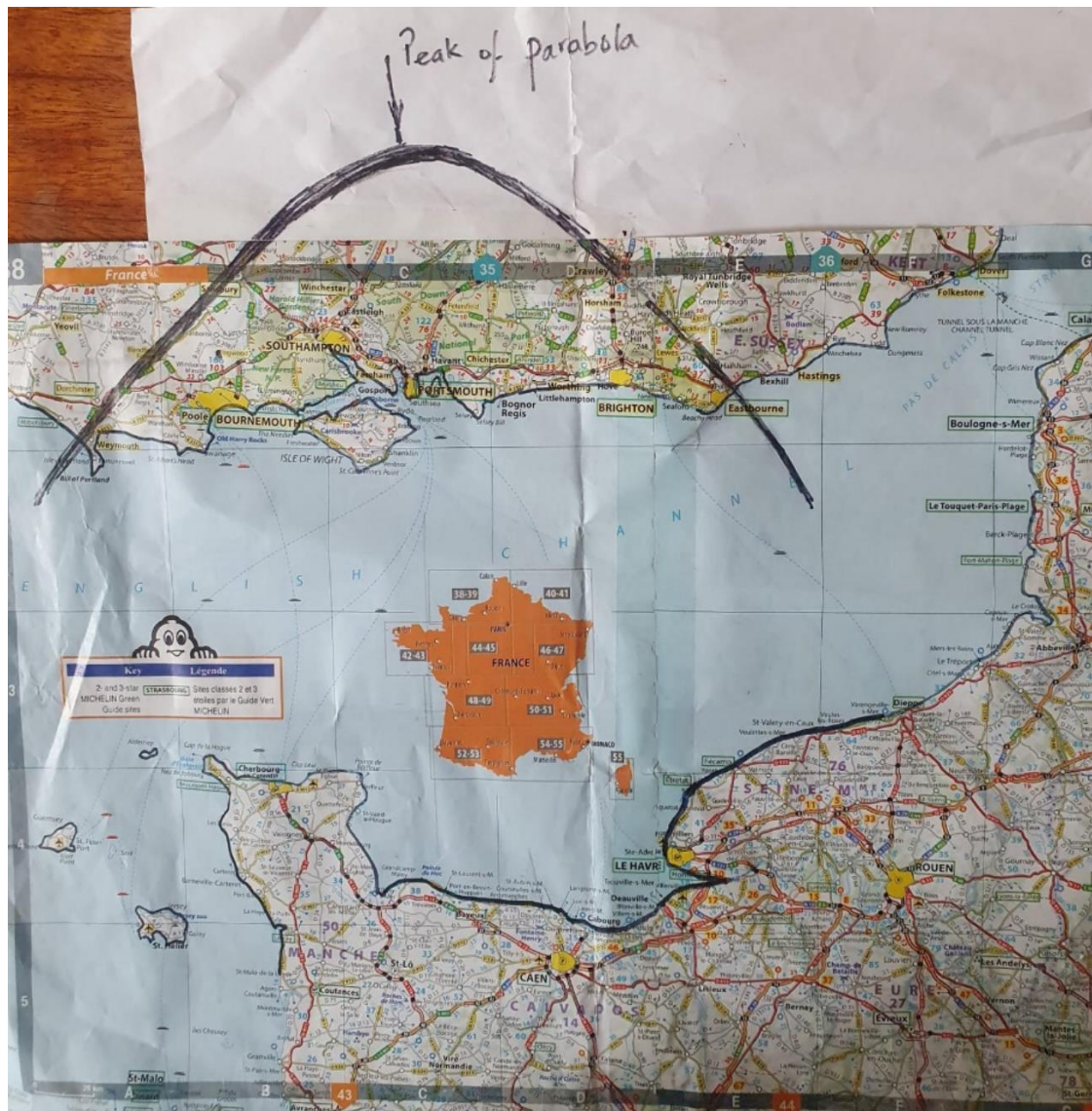
This diagram, Plate 2. 2 in the [Environmental Statement Volume 1](#) (PINS Ref.: EN020022) Chapter 2, page 2-8, is a map-like illustration representing part of the South coast of England. On closer inspection it is, in fact, rather confusing, having the word “Hastings” floating off-shore, nowhere near where Hastings actually would be on the map! Likewise, the Isle of Wight appears to be adrift!

This diagram/map has a parabola superimposed over it. The parabola encloses Portland Bill to the west and Eastbourne and Beachy Head to the East. The area within the parabola contains, we are invited to accept, those substations (10 in number), deemed suitable for the Aquind Interconnector to use as a connection point into the 400kv grid.

By implication, **substations outside this limited area are to be considered either not suitable, not viable or simply not to exist.** This misleading diagram has been used for all formal analysis; by the planning inspectors, by BEIS and by the Judge at the examination of the BEIS’ decision in the Royal Courts of Justice.

We have all been presented this Plate 2.2 as an accurate illustration of the project’s limits. It has been used to inform parties which have the power and authority to grant or refuse a project which carries huge harmful impacts.

This parabola excludes, among others, one substation which could be far more suitable for connection into national grid lines, namely Ninfield.



**The area covered by Plate 2.2 superimposed over a map of the English Channel**

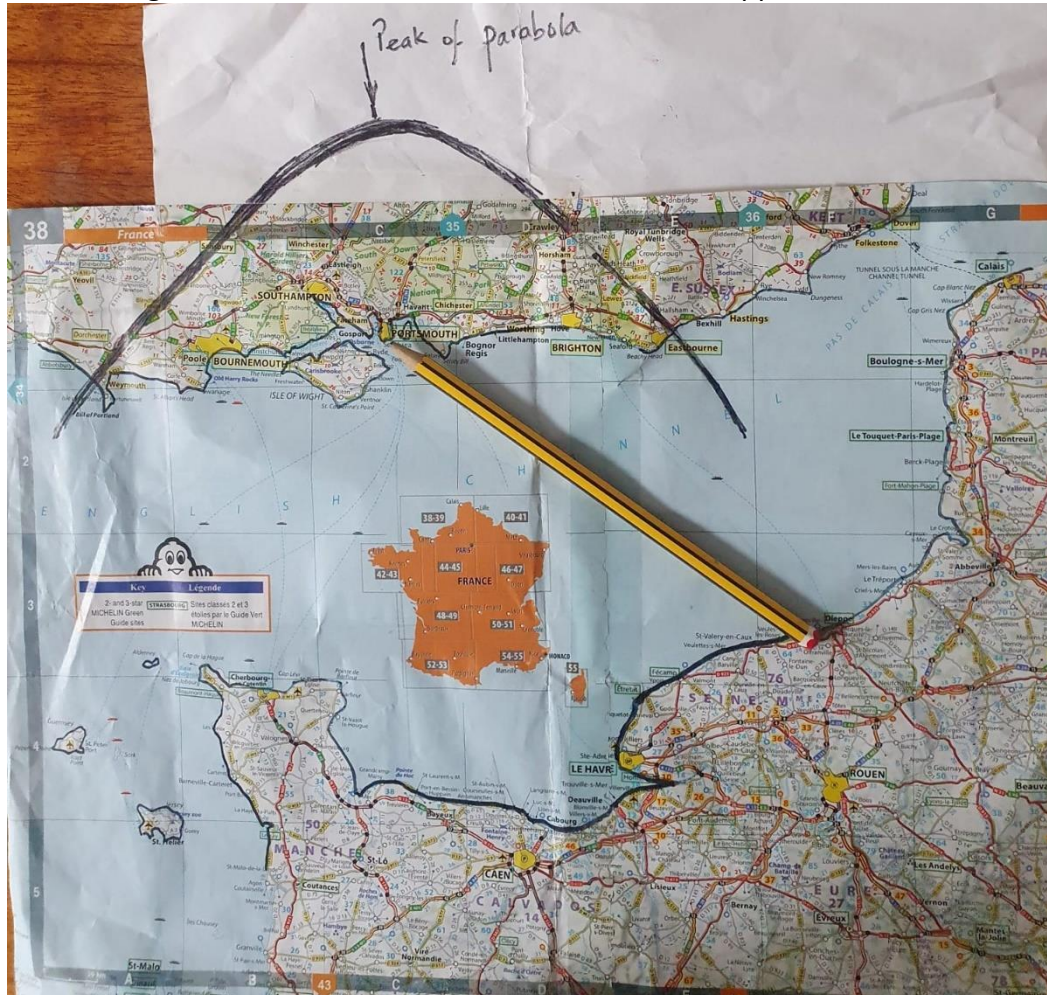
The misleading nature of Plate 2.2 is clearly evident when it is laid over a map showing the English Channel and the North coast of France from Calais in the east to Cherbourg in the West (see above). Such an overlaying clearly indicates the way in which misunderstanding is planted in an observer's mind.

It is possible that Plate 2.2 was drawn up at the same time that Aquind presented a diagram indicating that the landfall on the French side was in the Baie de la Seine near Le Havre. It is conceivable that Aquind did not think it necessary to redesign their presentation material, Plate 2.2, after the connection point in France had been moved Eastwards to just outside Dieppe.



Had the same parabola been used with Dieppe as the departure point on the French coast, different substations along the South Coast of England would have been included in the optioneering.

Compare the length of the off-shore cable routes between Dieppe and Portsmouth below...



Yellow pencil indicating direct cable route from Dieppe to Portsmouth

... with the length of the direct cable route from Dieppe to Ninfield shown here:



Grey pencil showing shorter direct cable route between Dieppe and Ninfield

We suggest that a revision to Plate 2.2 with France to the South, including substations to the East of Bolney and showing correct orientation in relation to the connection point near Dieppe, would have been a more true representation of the options for landfall on the south coast of England. Could it be that the planning inspectorate, the BEIS and the High Court Judge were all being guided by visual material that was misleading?

### **Misunderstanding with regards to the French landfall site during Aquind's judicial review**

Indeed, in the High Court Judge Lieven said she understood that the Aquind Interconnector came to land near Le Havre. We were present in the Royal Court of Justice when **she made the clear statement that landfall was to be at Le Havre.**

She used this understanding to form an opinion that the route chosen represented the shortest and most cost-effective route on offer! She formed this understanding having



available to her the 2 misleading (incorrect) diagrams presented to her by Aquind. One, Plate 2.2 and the other, showing landfall near Le Havre. She did not have an accurate, real-life illustration on which to base her understanding.

We maintain that alternative connection points, not just those chosen by Aquind, should have been considered; Ninfield, Dungeness and more besides. For a project as harmful and as unneeded as Aquind Interconnector to be allowed to proceed without considering all alternatives is unthinkable, potentially illegal.

We reiterate: National Policy Statement EN-1 is clear on this issue, as pointed out by the Planning Inspectorate's Recommendation report. Point 5.4.5 of the Recommendation states:

*"Alternatives that are not among the alternatives studied by the Applicant, as reflected in the ES, should only be considered if they are believed to be important and relevant to the decision. If an application gives rise to adverse impacts, alternative options could be important and relevant considerations".*

Ninfield is such an un-investigated alternative. The availability of an alternative connection point, although not considered suitable by the applicant, must be thoroughly investigated. The harm of a route via Portsmouth and beyond is reason enough to look to Ninfield.

Ninfield has been brought to the attention of BEIS and Aquind, but we think insufficient due diligence was given to the proposal. It is worth noting that in 2017 Ninfield was included in a document published by NG relating to Cap and Floor considerations facing a number of interconnectors. Aquind was included in this study for comparison but Ninfield was in the list of substations relevant to future connection into the grid.

In addition, just to the East of Ninfield is Dungeness. Could this not offer another connection point for the Aquind Interconnector? Another alternative. And are there not others further to the East? **Aquind appears to have been fixated on Lovedean as the ONLY possible connection point. BUT WHY?**

**A new emphasis on the export of electricity?**

One reason, which is hidden among the documentation, is that Lovedean offers Aquind the best access to home produced electricity for export TO France. Put simply, the cheapest and easiest way to sell our home-produced energy, is to give straightforward access to Lovedean from the North where most of our electricity is generated. This would suit Aquind just fine. Exempted from price regulation and connected in the most efficient way to enable export of our scarce energy. Is this good enough reason to be wary of granting the DCO?

The Aquind Interconnector would simply sell our home-produced energy into France and onward to the European market. This does not look good. We are encouraged to continually think of this project as enhancing UK Energy Security. Far from it. This privately-run, privately owned business, unregulated, could be anything but an enhancement to our energy needs. Aquind would make huge profits--- We do not want profits for a private company to trump the needs of the UK and its residents.



**Conclusion - Alternative connections points have not been adequately considered therefore the application should be refused**

The application for DCO was refused by our government. They got it right. There is much evidence to show that refusal must be given to a project causing huge harm and damage when alternatives have not been diligently assessed. Alternatives, outside the list furnished by the Applicant, must now be considered as both relevant and important.

**The SoS of the Energy Security and Net Zero department must have the same courage as his predecessor at the BEIS department. Throw this application into the wastebin as it cannot be approved.**