

From: [Martin Silman](#)
To: [AQUIND Interconnector](#)
Subject: AQUIND Interconnector - Unique Reference 20025182
Date: 20 June 2023 07:33:49
Attachments: [AQUIND Submission 30-03-23.pdf](#)

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

The Neighbourhood Forum previously wrote to you as an "Interested Party" on 30th March 2023 (see the attached) and on 16th November 2021.

We fully support and endorse the facts expressed by the 'Stop Aquind' team, particularly where they pertain to routing the proposed interconnector through Portsea Island (Portsmouth) and the harms that will be caused by doing so.

An interconnector route through Portsea Island is not justifiable for reasons we've already expressed. In particular, better routes are more economical and less socially and environmentally damaging. We thus repeat the question around the non-selection of Ninfield in East Sussex where the cross-channel distance is far shorter from an area of the French coast between Dieppe and Boulogne. The NGET appraisal of 2014 has still not been disclosed notwithstanding Mrs Justice Lieven requested sight of it - surely it is in the public interest and better for all concerned if this appraisal is published.

The second question we asked related to the huge disruption created by the development works through Portsea Island which are compounded by the progress of the North Portsea Island Coastal Defence works. These works have already denied residents access to a coastal footpath from the former Great Salterns Quay to Kendalls Wharf since the Summer of September 2021. Flood Defence works are national infrastructure projects too. The Aquind project would involve reopening groundworks before they've properly been established. However, whereas Sea Defence Works are essential to the sustainability of a community, the same cannot be said of Aquind's proposed route.

The proposal for laying the interconnector through Portsea Island talks about 'temporary' disruption and 'mitigation'. If asbestos and other hazardous materials are unearthed, as they undoubtedly will be with the route through several industrial landfill sites, we cannot accept that any mitigation is possible and the harm to local residents who ingest the dust will be anything other than temporary. These concerns are aside from those about the disruption to wildlife and the limited green environment through which the diggers are proposed to pass.

Kwasi Kwarteng was very conscious of the disruption created by running an interconnector through Portsea Island and therefore refused but did so on the viability of an alternative route via Mannington in Dorset. Although the Judicial Review considered his reasoning to be flawed in the absence of asking whether there was capacity to even accommodate the power from Mannington to Lovedean, that's not the proper consideration.

The proper question is whether there are substantial benefits from the granting of a DCO for a National Infrastructure Project. The ExA concluded there were.

The Le Havre to Lovedean route is now compromised by the European Union rejection of AQUIND having status as a "Project of Common Interest" (PCI). We refer to "Blake Morgan's" submission on behalf of the "Carpenters" where they advise the Sec of State that in February 2023, the General Court of the CJEU (Second Chamber) in Case T-295/20, dismissed the claim by Aquind that it be included in the new list of PCIs. It was of the opinion that the proposed Aquind interconnector was considered to be the most uncertain of the four being considered and because of over-capacity, four would be unnecessary.

There cannot be substantial benefits from granting a DCO for a route to nowhere.

Following the introduction of the 2012 Public Services Act: <https://www.legislation.gov.uk/ukpga/2012/3/enacted>, Public Authorities should take account of "Social Value". Since January 2021 they have been mandated to do so under the Public Procurement Notice (PPN) 06/20: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/921437/PPN-06_20-Taking-Account-of-Social-Value-in-the-Award-of-Central-Government-Contracts.pdf

Whether or not Kwasi Kwarteng was aware of the PPN is actually irrelevant. However, the granting of a DCO for an uncertain project that would have serious ramifications on a community of more than a quarter of a million residents on spurious grounds is clearly inconsistent with the concept of "Social Value"

The application for a DCO should be **REFUSED**.

Rod Bailey, 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 six Ward Councillors:-
Cllr. Gerald Vernon Jackson CBE
Cllr. Steve Pitt
Cllr. Kimberley Barrett
Cllr. Abdul Kadir
Cllr. Darren Sanders
Cllr. Leonie Oliver

19th June 2023

Thanks & Regards,

Martin Silman

Chair of/for Milton Neighbourhood Forum
Portsmo



Subject: AQUIND Interconnector:- National Infrastructure Project

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