

**From:** [Janet](#)  
**To:** [Aquind Interconnector](#)  
**Subject:** RE-Consultation on AQUIND Interconnector Project  
**Date:** 08 March 2024 08:58:45  
**Attachments:** [Penny Mordaunt Ltr 20 Feb 24.jpg](#)

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AQUIND Interconnector Team

Interested Party Reference number: 20025182

Project EN020022

Thank you for inviting us to comment on the referral to the Ministry of Defence of the AQUIND Project.

A member of the Milton Forum received a letter dated 20th February 2024 reference PM27768 from the Portsmouth North MP and Leader of the House of Commons, Penny Mordaunt, on the subject of energy security (see the attached). It explains the rationale for UK's divestment from relying upon other Nations and Parties for energy.

We have previously questioned the justifications for choosing Portsmouth as the Interconnector Landfall site and, for ease of reference, we've included our response of 30th March 2023 in full below.

AQUIND relies upon Section 35 of the 2008 Planning Act bypassing Local Planning Authorities and the Marine Management Organisation to save time and risk of local challenge. AQUIND had hoped to have an operational Interconnector toward the end of 2022 or early 2023 but using Portsmouth as a landfall option, was always likely to be contentious. The disruption to hundreds of thousands of residents within, and around, Portsmouth, when the adjacent Hayling Island is the obvious Landfall option for an Interconnector to link with Lovedean, is totally unjustifiable.

Lovedean was announced as a suitable HV Grid connection point. The flaw in the process permitting

AQUIND to promote both the connection options and the alternatives for routing cables, is that the Inspectorate is not determining an impartial solution to a National Project.

Neither we, Portsmouth City Council or "Lets Stop Aquind", have seen the NGET "Feasibility Study". Crucially, neither has the Secretary of State or Lord Justice Lieven in making her ruling in the January 2023 High Court Judicial Review.

The ExA in recommending the DCO be approved by the Minister, balanced the benefits over harm based on AQUIND's choices. If the Minister is unsighted of the Feasibility Study, then his choices to approve or reject are unfounded. Furthermore, unless and until Energy

Security has been properly appraised, the ExA's original Decision ought to be suspended if not disregarded.

In the absence of the Feasibility Study publication, we and the other Interested Party Consultees, cannot be fully informed of the rationale in support of wider public interest. If the UK is divesting itself of foreign energy dependency, the case for AQUIND's Interconnector makes no sense.

Can we ask firstly, that the Minister appraise himself, of NGET's Feasibility Study and the ramifications thereof? Secondly, that the Minister takes the time and effort to properly appraise the public benefit/harm in making Portsmouth a suitable landfall option?; Thirdly, that he properly evaluate the risks to National Security of granting non-UK promoters of Energy Infrastructure, rights to enter the UK Energy Market?; and fourthly that he be prepared to visit Portsmouth and justify his reasoning in public to hundreds of thousands of residents?

In the absence of clear and demonstrable public benefit, the landfall option of Portsmouth by AQUIND must be REFUSED

Rod Bailey Milton Neighbourhood Forum (Planning Group)  
Martin Silman Chair Milton Neighbourhood Forum

Supported by Ward Councillors:-

Cllr. Steve Pitt

Cllr. Gerald Vernon-Jackson CBE

Cllr. Kimberley Barrett

Cllr. Darren Sanders

Cllr. Abdul Kadir

Cllr. Leonie Oliver

8<sup>th</sup> March 2024

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





## PENNY MORDAUNT MP

MEMBER OF PARLIAMENT FOR PORTSMOUTH NORTH

Ground Floor, 1000 Lakeside

North Harbour

Portsmouth

Hampshire PO6 3EN

Ms Viola Langley

20 February 2024

Our Ref: PM27768

Dear Viola Langley

Thank you for your email about new oil and gas licenses.

As we have seen over the last couple of year, global energy supplies have been disrupted and weaponised by the likes of Putin, causing household bills to soar and economic growth to slow around the world.

It is therefore essential that the UK has energy independence and security, and the Government is determined to safeguard our energy supply and power up Britain from Britain. As such, the Government is not only backing our oil and gas sector, but also investing in renewable energy and carbon capture.

The UK, like most major economies, is highly dependent on oil and gas and will be for decades to come. According to the Committee on Climate Change, oil and gas will still provide more than half of our energy needs in 2035, and 24 per cent of our energy needs even in a net zero 2050.

The Government remains firmly committed to its net zero target. However, oil and gas will be required in the transition to net zero, simply turning off the taps would mean we would have to import oil and gas, leaving us susceptible to global circumstances. Further, importing oil and gas harm our ambition to reach net zero. According to the North Sea Transition Authority, imported gas has a carbon footprint which is three times that of domestically produced gas.

The Government is therefore boosting our energy security by committing to hundreds of new oil and gas field licences in the North Sea, making sure we are not reliant on expensive, foreign imports. It is also investing in Carbon Capture and Storage, delivering on our net zero ambitions while creating 25,000 jobs and driving £10 billion of investment.

I therefore welcome that the Government has introduced legislation to support the future licensing of new oil and gas fields, helping the country transition to net zero by 2050 without adding undue burdens on households. The Offshore Petroleum Licensing Bill will strengthen the country's energy security and reduce reliance on volatile international energy markets and hostile foreign regimes.

Thank you once again for contacting me.

Yours sincerely

Penny Mordaunt MP