

Head of Energy Infrastructure Planning,  
Department of Business, Energy and Industrial Planning,  
1, Victoria Street London SW1H 0ET

2nd December, 2021

Dear Gareth Leigh,

**AQUIND proposed project**

Thankyou for your letter, ref. EN020022, of 1st December, 2021, inviting comments on the recent information submitted by Martyn Jarvis and others (of Herbert Smith Freehills LLP / WSP UK Limited), on behalf of AQUIND Limited, in response to the Secretary of State's request (of 4th November) for further information about their proposed project for high voltage cables and optic fibres to run under the Solent from Normandy and then beneath the residential conurbation of Portsmouth and Waterlooville, to an interconnector at Lovedean, in East Hants.

Firstly I wish to comment on the length of the AQUIND response document which altogether reaches 3500 pages. Although my experience is of writing smaller project documents I wish to criticise this format. I fear that there are ulterior motives in the unnecessarily elaborate language, repetitions and cross-referencing in this response which will not only take up much of the Secretary of States time over the Christmas recess but also deter the many ardent opponents of this project from making valid comments. I hope my own are more concise. Having already expressed my concerns about other aspects of this project I will only address issues raised by the Secretary of State, namely:

**1. Consideration of Alternatives**

The latest Aquind response document reveals that connection of the submarine power cable to Mannington sub-station was not seriously considered despite there being a residual connection agreement for the Navitus Bay project after the latter was dropped. Also at that time National Grid had spent £5m revamping 40 km of overhead lines through Dorset, Hampshire and Wiltshire which could facilitate the Dorset route. Meanwhile the Aquind project team were carrying out "optioneering" exercises in relation to Lovedean, having dismissed the other **twenty-eight potential landfall sites across the south coast and at least ten other possible sub-stations**, some already being upgraded with solar and storage capacity. The majority of alternative routes could avoid affecting densely populated residential areas or other areas of environmental sensitivity. Unfortunately the major factor influencing Aquind choices appears to be financial impact on, and convenience for, the project itself with scant consideration for the consequences of its implementation for the citizens and environment of Portsmouth, Waterlooville and East Hants.

**2. North Portsea Island Coastal Defence Scheme**

It is noted that the Aquind response document questions the veracity of the Secretary of State's assertion that six construction compounds required for the North Portsea Island Coastal Defence Scheme would also be required for the proposed Aquind development. There is a very subjective and controversial comment by the Aquind lawyers. My interpretation of para.3.6 of the Aquind statement is that it attempts to circumnavigate the issue which is confused by the use of phrases such as "it has been identified", "Aquind is confident", "Aquind is entirely convinced" and "Aquind confirms". As far as I am aware, the draft documents about possible cooperation put forward by Aquind have NOT been agreed with Portsmouth City Council nor by the Coastal Partners. Promises of compensation by Aquind and the suggested solutions to identified problems, including flood risks, affecting the Portsmouth council, residents and businesses do little to alleviate our fears that this project threatens to seriously disrupt the life of this city and its environs, which are scarcely mentioned in the document.

I remain, yours respectfully,

Patrick A. Whittle, BSc., M.Phil