



**RESPONSE TO THE SECRETARY OF STATE FOR ENERGY SECURITY AND NET ZERO'S REQUEST FOR INFORMATION AND UPDATES (DATED 3/3/23) FROM VIOLA LANGLEY AND IAN DAYE (INTERESTED PARTIES IN THE MATTER OF THE AQUIND INTERCONNECTOR DCO PROPOSAL), SUBMITTED ON BEHALF OF LET'S STOP AQUIND BY EMAIL 28/4/2023**

*WITH ADDITIONAL CONTRIBUTIONS FROM LET'S STOP AQUIND MEMBERS PAULA ANN SAVAGE, JAN DENNIS, DAVID LANGLEY, PAUL GONELLA (STRONG ISLAND MEDIA) AND JONATHAN WALKER. FURTHER RESEARCH PROVIDED BY JEAN NICHOLAS AND DONALD BRUMENT OF NON A AQUIND, OUR FRENCH COUNTERPARTS.*

**NOTE TO THE PLANNING INSPECTORATE – THIS DOCUMENT CONTAINS A SUBSTANTIAL AMOUNT OF NEW INFORMATION AND ORIGINAL RESEARCH NOT PREVIOUSLY SUBMITTED**

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## INTRODUCTION: LET'S STOP AQUIND

Let's Stop Aquind (LSA) is a grassroots action group formed in 2019 by Viola Langley and Paula Ann Savage to protect Portsmouth and the South Downs from the threat of the Aquind Interconnector.

LSA campaigns on [Facebook](#) (where it has 4100 followers), [REDACTED] (900 users pm), [Instagram](#) (800 followers) and [Twitter](#) (600 followers). It is recognised as the leading community opposition to the Aquind Interconnector by local and national media, all the MP's affected by the route as well as Portsmouth City Council, Winchester City Council and other local authorities. LSA membership across all channels, and involvement with our campaigns, continues to grow as we raise awareness of the dangers of the Aquind Interconnector.

LSA liaised with its counterpart [Non A Aquind](#), with regards to the French aspects of this submission.





**SECTION 1: 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.

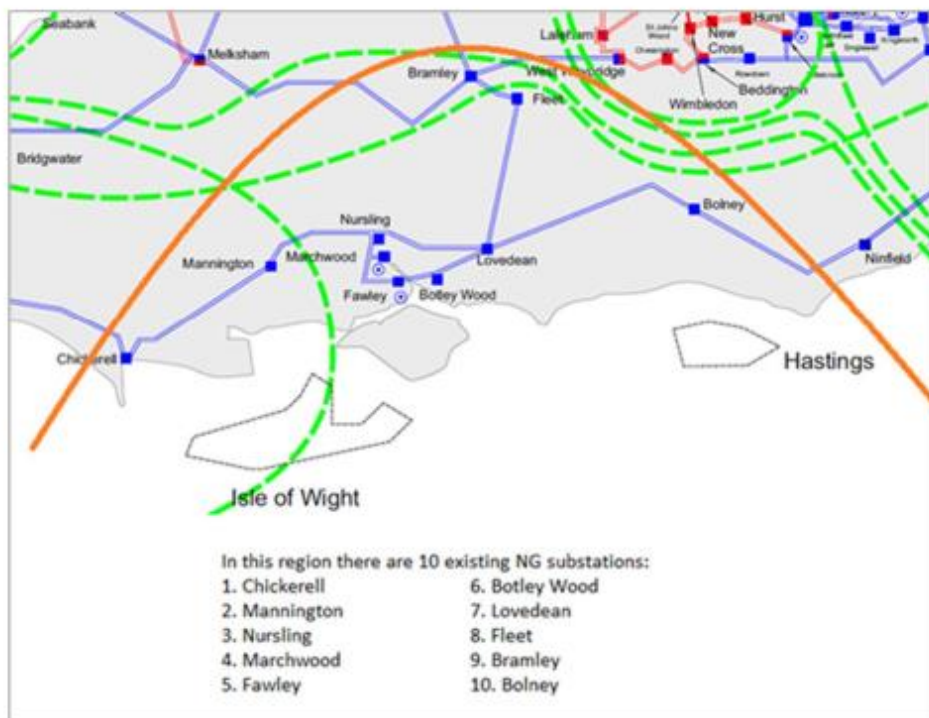
#### **How misleading material presented by the Applicant has restricted the range of options under consideration**

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

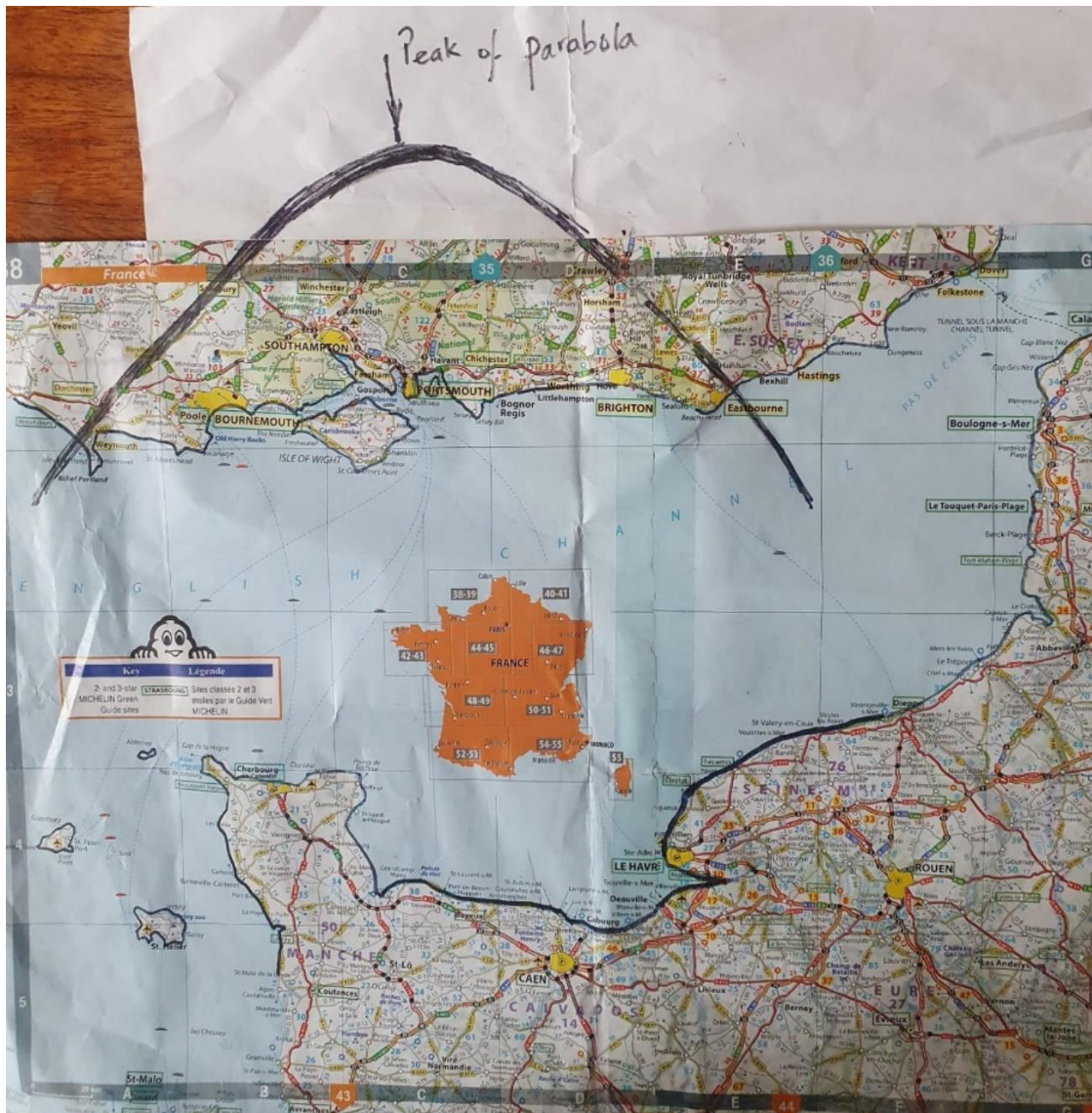




formal analysis; by the planning inspectors, by BEIS and by the Judge at the examination of the BEIS' decision in the Royal Courts of Justice.

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

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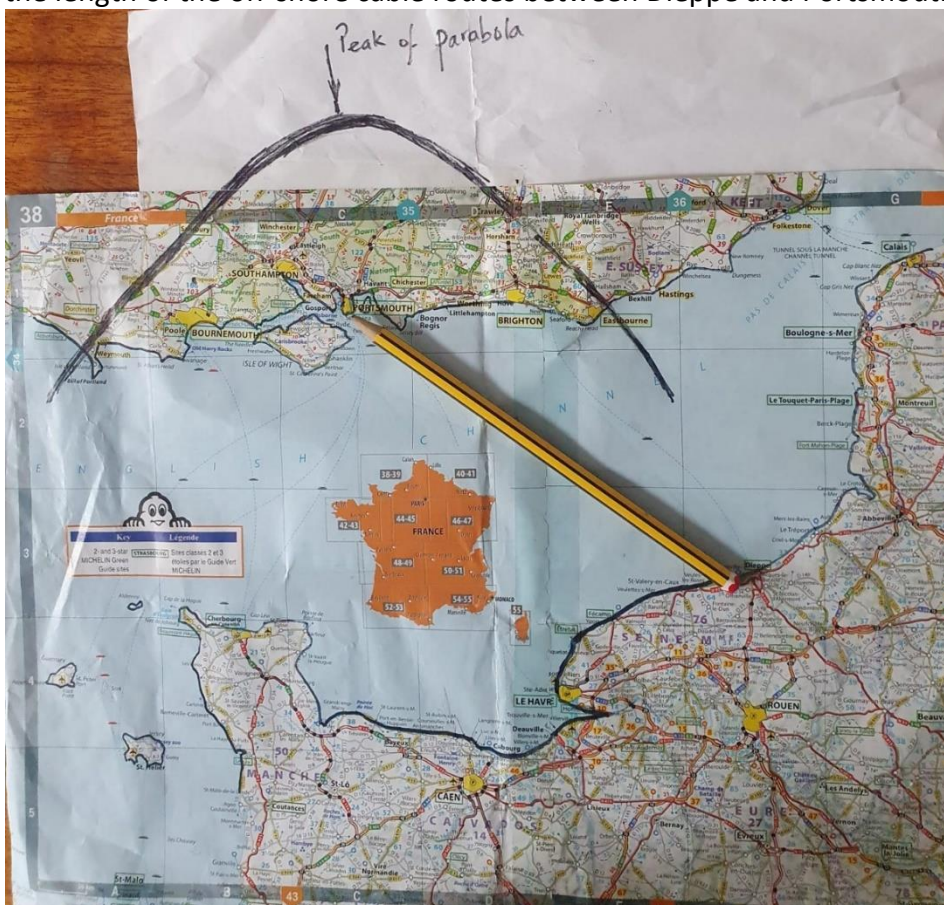


The misleading nature of Plate 2.2 is clearly evident when it is laid over a map showing the English Channel and the North coast of France from Calais in the east to Cherbourg in the West (see above). Such an overlaying clearly indicates the way in which misunderstanding is planted in an observer's mind.

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...



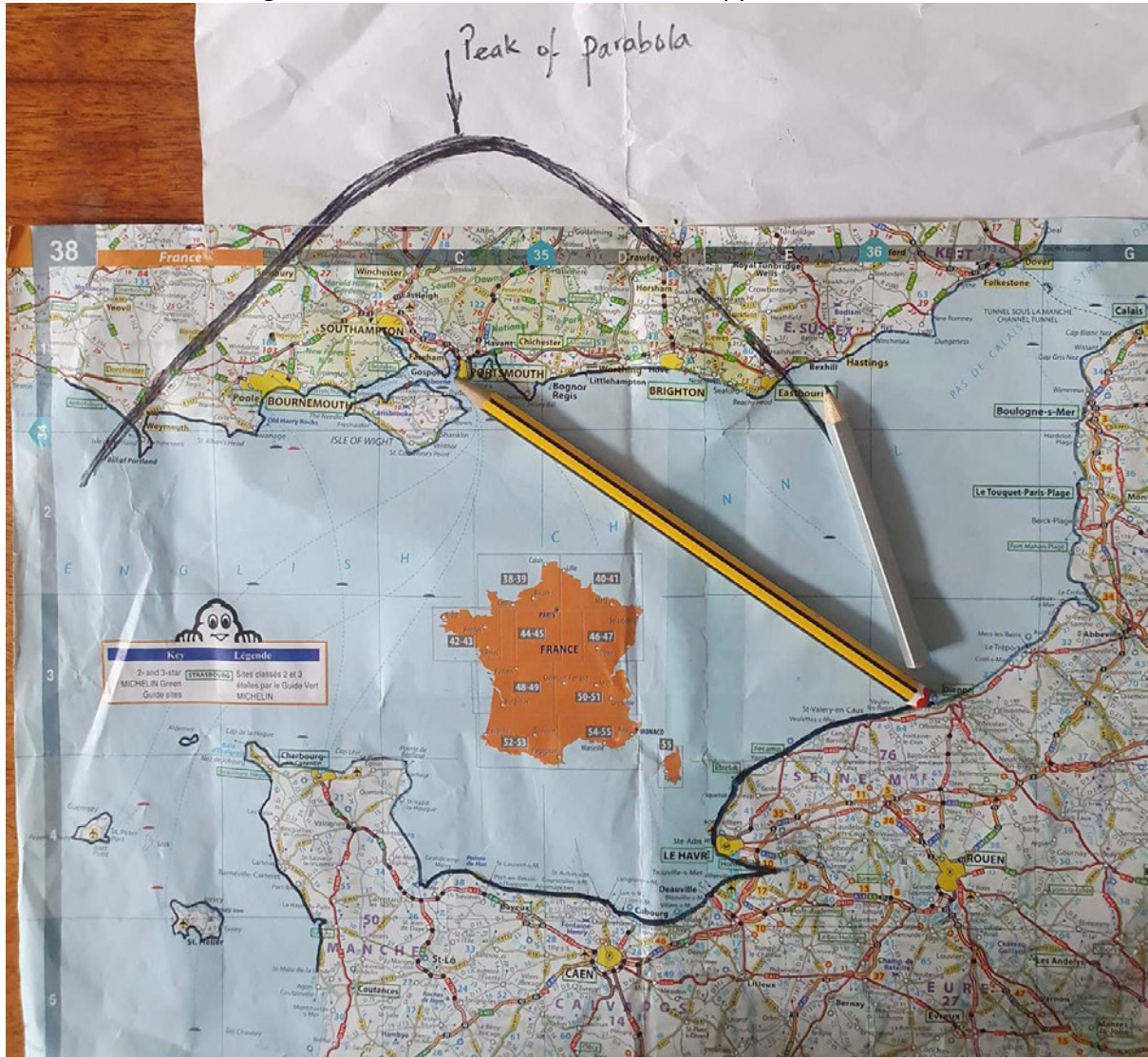
**Yellow pencil indicating direct cable route from Dieppe to Portsmouth**

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... 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?

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### 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.**





## SECTION 2: FRENCH LICENCES AND CONSENTS

### **Refusal of the Project by the Prefet of Seine Maritime**

As of today, it seems that Aquind has received neither licences nor consents to start the process of a DCO (or equivalent) in France - on the contrary, France has clearly rejected the application.

The Prefet of Seine Maritime came to the conclusion that Aquind did not meet the necessary standards and conditions such a project would require. Considering the damage this project would cause in the French countryside and the effects it would have on the residents, the Prefet found there were too many negative concerns. A document by Non A Aquind, a non-profit organisation set up in January 2019, fully recognised as an interlocuter between the mayors, deputes, senators, specialised organisations as well as the French government via the Prefet, is set out below. This document explains clearly the devastation this project would have on their local environment and its residents. The 15 mayors of the affected areas are united in their opposition to this project. (from [REDACTED])

The [statement confirming the refusal of this project by the Prefet in 2021 can be downloaded here](#). According to the Secretary of the Prefet, as of March 2023, Aquind had not launched any appeal. Therefore, this decision is up to date and Aquind has not got a licence nor a consent for the Aquind Interconnector in France.

### **Loss of PCI status**

Europe refused to renew Aquind's status as an EU "Project of Common Interest" in 2021 and 2023, even though Aquind appealed against this decision. A judge at the EU Court of General Justice has dismissed Aquind's challenge to keep the interconnector plan on the list of PCI's.

(from: [REDACTED])  
which is summarised here: [REDACTED]  
[REDACTED]





### **A new law “Zero Net Artificialization” would not support the construction of the Aquind Interconnector**

The objective of “Zero Net Artificialization” is to suspend any net increase in the total amount of artificial surfaces at a time of ecological emergency, protecting biodiversity and the natural soil. It stresses the importance of protecting large rural areas, together with their biodiversity and wild life habitats.

### **Environmental damage in France**

The Aquind Interconnector threatens to damage the beach of Pourville sur Mer. The cables would then continue along roads for 30 km, passing through 15 villages near schools, homes, campsites, shops or sensitive buildings. All the works/amenities carried out by the municipalities along the roads over several years could be destroyed. The 320 000 Volt cables would be laid 1.20 m deep in sand, representing a health threat to the population, fauna and flora. The 15 mayors involved are firmly against this project. At the end of the route (30 kms), Aquind wants to build two enormous Converter Halls, each measuring 70 meters long, 50 m wide and 22 m high, on a plot of 12 to 15 hectares of agricultural land as well as siting electrical equipment of substantial size. These would be constructed near homes in the villages of Varneville-Bretteville and Bertrimont. This would be connected to the Barnabos substation, which was built in the 1960s and 1970s to receive electrical output from the Penly and Paluel nuclear power stations, which already cause disturbance to local residents.

### **The socio-economic effects of Aquind in France**

The communities are extremely concerned about the effects this project would have for them during and after construction. Non A Aquind, a local officially recognised group set up in 2019, represents the concerns of the residents of the area affected by this project. Non a Aquind has worked and corresponded with local and national governmental representatives to point out the harmful effects of this project. This proposal has already put enormous stress on their mental and physical health.





### **Interconnectors already in place in France**

France has already 3 existing Interconnectors connected with the UK:

1. IFA - 2 GW
2. IFA 2 – 1 GW
3. Eleclink – 1GW

A further two interconnectors have been approved:

1. Gridlink -1.4 GW
2. FAB link – 1.4GW

(from <https://www.ofgem.gov.uk/energy-policy-and-regulation/policy-and-regulatory-programmes/interconnectors>)

France also has interconnectors with Belgium (IFB), Germany (IFD), Italy (IFI), Spain (IFE) and Switzerland (IFS)

(from: [REDACTED])

A further interconnector between Ireland and France, capacity 700Megawatts and a Project of Common Interest, has been confirmed between French energy regulator CRE and their Irish counterpart CRU. (10.11.2022)

(from: [REDACTED])

**Considering the existing and planned future interconnectors, the question arises if the Aquind Interconnector is needed in France's energy supply.**

- Would the Aquind Interconnector threaten the cost/benefit balance of the other interconnectors?
- What is the public benefit of the Aquind Interconnector, run by a privately owned company, not having the status of Project of Common Interest?
- The harms and benefits of this project have to be carefully considered, particularly taking into account climate emergency and biodiversity loss. Do the harms of this project to the local environment (30 km inland) outweigh the benefits (energy supply for a relatively short period of time in human history)?
- Is this approach not very short-sighted long term, especially if there are numerous interconnectors already approved or currently under construction?

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## SECTION 3: ENVIRONMENTAL INFORMATION

### SECTION 3A: ENVIRONMENTAL INFORMATION (TOXIC WASTE ON THE PROPOSED ROUTE)

#### **The risks of disturbing asbestos and toxic waste**

*This section has been researched by Paula Ann Savage, who has direct experience of the devastating effects to health that asbestos can cause. Paula has this to say about her loss:*

"I write to you with the hope that you will make the right decision with regards to the Aquind Interconnector project.

After losing my own father to asbestosis a few years back, I am extremely concerned about the trenching and disturbance of contaminated land known to contain many toxic chemicals, one being Asbestos. After witnessing the horrific decline of health and heart-breaking death of my father, I urge you to seriously consider the consequences this project could subject the people of Portsmouth to. I'll never forget my father saying that "It feels like my lungs are made of brittle plastic"."

According to the UK Asbestos Training Association (UKATA), [asbestos remains Britain's biggest workplace killer](#). There are over 5,000 asbestos-related disease deaths per year.

Inhalation of asbestos fibres can cause cancers such as mesothelioma and lung cancer, and other serious lung diseases such as asbestosis and pleural thickening.

**2,544** mesothelioma deaths in 2020, **with a similar number of lung cancer deaths** linked to past exposures to asbestos.

**530** deaths in 2020 mentioning asbestosis on the death certificate (excluding deaths that also mention mesothelioma).

The cable is intended to take a north bound route tunnelling through historical landfill known to contain (Asbestos). Under the Town and Country Planning (General Development Procedure) Order 1995, planning authorities have to consult with the (Environment Agency) to develop land within (250) meters of landfill sites, including any land that has been used as a landfill site within the last 30 years or likely to be used as one in the near future.

The area in and around where the cable is going is a great concern of mine for this reason. This project was turned down by the (local authority) initially, then the Government decided to grant the project NSIP status (Nationally Significant Infrastructure Project). At this point the decision was taken out of local hands and given to the Secretary of State.

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It is a daunting probability that while this project is going ahead, it will disturb extremely dangerous substances currently in the ground which will be released, becoming seriously detrimental to the health of all of those living and working in and around the city of Portsmouth.



**The areas in pink above are historical landfill sites - some are known to contain asbestos – the proposed route of the cable passes directly through many of these sites**

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The cable will be tunnelling through areas known as the “Glory Hole” pictured below.



### The health dangers of asbestos

All forms of asbestos fibres are hazardous as they can induce cancer following inhalation exposure, but amphibole forms of asbestos (including blue and brown) are more hazardous to health than chrysotile (white).

Breathing in high concentrations of asbestos for a long period of time mainly affects the lungs, causing a disease called asbestosis where breathing becomes difficult and the heart enlarges. Asbestosis may take decades to develop. Asbestosis sufferers are at an increased risk of cancer. Exposure to lower concentrations of asbestos over time may result in a general (diffuse pleural thickening) or localised (pleural plaques) thickening of the lung lining.

See the Health and safety at work summary statistics for Great Britain (2022) shown below.

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Health and safety at work  
Summary statistics for Great Britain 2022



## Occupational lung disease

**12,000**

Lung disease deaths each year estimated to be linked to past exposures at work

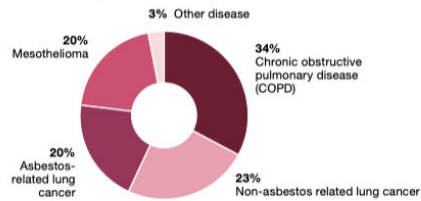
**2,544**

Mesothelioma deaths in 2020, with a similar number of lung cancer deaths linked to past exposures to asbestos

**19,000**

Estimated new cases of breathing or lung problems caused or made worse by work each year on average over the last three years according to self-reports from the Labour Force Survey

Lung diseases contributing to estimated current annual deaths

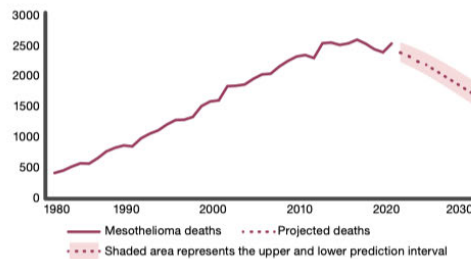


Occupational lung diseases account for around 12,000 of the 13,000 total deaths estimated to be linked to past exposures at work.

Annual mesothelioma deaths are expected to reduce over the period 2020 to 2030.

Prior to the coronavirus pandemic, the rate of annual new cases of occupational asthma seen by chest physicians had been increasing.

Annual mesothelioma deaths and future projections to 2030



To find out the story behind the key figures, visit <https://www.hse.gov.uk/statistics/causdis/index.htm>

### Historical evidence of asbestos contamination on the proposed route

We have commissioned a video below, to explain the history of dumping toxic waste in Portsmouth and examine the health dangers of disturbing the waste buried along the route:



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The asbestos contamination made headline news in Portsmouth during the 90's, one incident is documented both in the Newspapers and on the Evening News, where one hundred and eighty people were evacuated from their homes. Some of these headlines are shown in the pages of library research below:



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FORTSMOUTH CITY COUNCIL  
LIBRARY SERVICE  
NOT TO BE  
TAKEN AWAY

I Chemicals SH  
I Lumsden Rd families tell of bouts of sickness p6  
A '91-09-30  
\*\*\*\*\*  
I Ministry of Defence SH  
I Accused of not doing enough for naval families near Lumsden Rd estate p6  
A '91-09-30  
\*\*\*\*\*  
I Chemicals SH  
I Ports.City Council urged to screen ex-Lumsden Rd estate residents p6  
A '91-10-02  
\*\*\*\*\*  
I Chemicals SH  
I Ports.housing chairman wants government enquiry into Lumsden Rd alert p7  
A '91-10-03  
\*\*\*\*\*  
I Chemicals SH  
I PCC backs call for independent inquiry into Lumsden Rd housing p9  
A '91-10-04  
\*\*\*\*\*  
I Housing SH Portsmouth  
I Air & dust tests being conducted on Lumsden Rd estate p9  
A '91-10-04  
\*\*\*\*\*  
I Chemicals SH  
I Residents living nr Lumsden Rd demand PCC tests on land p7  
A '91-10-08  
\*\*\*\*\*  
I Chemicals SH  
I 160 people from Lumsden Rd take up health screening offer p7  
A '91-10-08  
\*\*\*\*\*  
I Chemicals SH  
I Lumsden Rd residents ignore warnings to keep off play areas p7  
A '91-10-08  
\*\*\*\*\*  
I Housing SH Portsmouth  
I Environmental health dept to try to trace ex Lumsden Rd residents p13  
A '91-10-10  
\*\*\*\*\*  
I Chemicals SH  
I Protective membrane found in soil near Lumsden Rd estate p5  
A '91-10-11  
\*\*\*\*\*  
I Asbestos SH  
I Widow of asbestos victim Leonard Foster warns Lumsden Rd residents p3  
A '91-10-14  
\*\*\*\*\*  
I Chemicals SH  
I Claims that council had secret file on Lumsden Rd in 1986 p1&9  
A '91-10-16  
\*\*\*\*\*  
I Pollution SH Soil  
I Residents of Lumsden Rd called to meeting with T & G lawyers p7  
A '91-10-19  
\*\*\*\*\*  
I Ministry of Defence SH  
I Unsure as to how best to isolate Lumsden Rd area p7  
A '91-10-19  
\*\*\*\*\*



# STOP AQVIND

Housing SH Portsmouth  
Cheap homes plan for poisoned Lumsden Rd estate at Eastney p7 \*  
'93-01-15  
\*\*\*\*\*

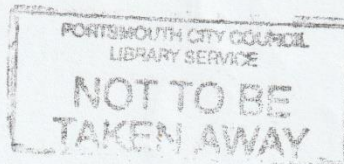
Chemicals SH  
Inquiry reveals pressure to build homes resulted in Lumsden Rd estate 1  
'93-02-09  
\*\*\*\*\*

Chemicals SH  
No warning given when Lumsden Rd estate was leased p7  
'93-02-11  
\*\*\*\*\*

Chemicals SH  
Evacuation of Lumsden Rd homes not really justified p7 \*  
'93-03-05  
\*\*\*\*\*

Chemicals SH  
Labour MP John Battle backs call for building on Lumsden Rd site p6 \*  
'93-04-07  
\*\*\*\*\*

Land SH Portsmouth  
MoD quizzed over sale of Lumsden Rd housing & Eastney Barracks p7 \*  
'93-04-16  
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FORTSMOUTH CITY COUNCIL  
LIBRARY SERVICE  
NOT TO BE  
TAKEN AWAY  
SH

✓ LUMSDEN ROAD

19/9/91 →

Chemicals  
Lumsden Rd families refuse to quit homes after chemicals found p1  
'91-09-19  
\*\*\*\*\*

Housing SH Portsmouth  
Parents fear for health of children from Lumsden Rd estate p1 \*  
'91-09-20  
\*\*\*\*\*

Housing SH Portsmouth  
Evacuation of Lumsden Rd estate begins p2 \* 3  
'91-09-20  
\*\*\*\*\*

Land Reclamation SH  
Concern for safety of landfill sites as Lumsden Rd hazard revealed p10  
'91-09-20  
\*\*\*\*\*

Land Reclamation SH  
Concern for safety of landfill sites as Lumsden Rd hazard revealed p10 \*  
'91-09-20  
\*\*\*\*\*

Asbestos SH  
Sam Waterman calls for Lumsden Rd to be levelled after asbestos fears p1 \*  
'91-09-21  
\*\*\*\*\*

Housing SH  
Residents urged to leave Lumsden Rd estate after asbestos fears p1 \*  
'91-09-21  
\*\*\*\*\*

Asbestos SH  
Pauline Banfield fears for daughter after living near Lumsden Rd p3 \*  
'91-09-21  
\*\*\*\*\*

Chemicals SH  
Lumsden Rd residents express fear over "hit and miss" health tests p8  
'91-09-25  
\*\*\*\*\*

Marinas SH Eastney  
Residents fear house devaluing effect of Lumsden Rd chemicals scare p8  
'91-09-25  
\*\*\*\*\*

Chemicals SH  
Water on Lumsden Rd estate claimed safe to use p8  
'91-09-25  
\*\*\*\*\*

Chemicals SH  
Poisoned land at Lumsden Rd to be no-go area for public p1  
'91-09-27  
\*\*\*\*\*

Martin David MP SH  
To quiz ministers about poisoned Lumsden Rd estate p2  
'91-09-27  
\*\*\*\*\*

Chemicals SH  
Lumsden Rd residents fear becoming outcasts if area is fenced off p7  
'91-09-28  
\*\*\*\*\*

Chemicals SH  
Health screening of Lumsden Rd residents to begin p1 \*  
'91-09-30  
\*\*\*\*\*



## **Non-conformance with the UK Government Environmental Improvement Plan 2023**

New evidence that Aquind's proposed works will contravene the government's own 25-year plan and environmental objectives as detailed in the [UK Government's Environmental Improvement Plan 2023](#) that was published in February this year.

1. P73 of this document states that:

***'However, air pollution continues to be the biggest environmental risk to human health, with particular hotspots in some urban areas.'***

***'It also harms the natural environment, affecting our biodiversity, waterways and crop yields.'***

Yet Aquind's trenches will be very wide, meaning that at least one lane of the Eastern Road will be closed for months or years. We have only three main roads in and out of the city and this is one of them. It is an urban hotspot and the result will be gridlock. It will do untold damage to residents' lives and to businesses, not only along the route but throughout our city and beyond.

It makes no sense to route this interconnector through Portsmouth, the second most densely populated city after London with already high levels of pollution and very poor air quality. It is bad enough now, especially on match days when Pompey are playing at home; the tailback often extends the length of the Eastern Road (which runs alongside Milton Common and the shoreline) and off the island too. The fumes from engines idling will make already unsafe levels of pollution even worse.

2. P211 states the Environmental Goal is to:

***'Reduce the risk of harm to people, the environment and the economy from natural hazards including flooding, drought and coastal erosion.... that is why we have made significant investments to improve coastal and flood defences'***

Yet Aquind's trenching and drilling would interfere with the much-needed new sea defences running alongside Langstone Harbour that are already under construction. There is a serious risk of flooding if this work is disrupted.

3. P30 of the Environmental Plan states:

***'We will achieve a growing and resilient network of land, water and sea that is richer in plants and wildlife.'***

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Yet in response to fierce opposition from Eastney and Milton allotment holders Aquind now propose to tunnel beneath these cherished allotments. This raises troubling questions about the possible toxicity of lubricants used when drilling and the risk of contaminating the produce grown there.

Drilling beneath the only Nature Reserve in the city, where groups of children are taken to learn about nature, will harm biodiversity.

4. P34 of the Environmental Plan quotes the government’s long term target as:

***‘by 2030, we will halt the decline of species abundance.’***

Yet the proposed route cuts through an area of scientific interest at Langstone Harbour, a feeding ground for shoreline wading birds and the Brent geese that fly thousands of miles from Siberia to arrive here every year. It also cuts through a seagrass meadow at Farlington Marshes, another area that is supposed to be protected. No mitigation can prevent migrating birds from not returning to an area they have been forced to abandon. Many species of flora and fauna will be lost forever.

Using Portsmouth as a Landfall option has never been acceptable because of the huge social disruption and otherwise unnecessary environmental harm.

5. The UK Government’s 10 point plan (2021) states that:

<b>New and advanced nuclear power could deliver...</b>		
A large-scale nuclear power plant will support a peak of around 10,000 jobs during construction	Government support could unlock significant private investment, up to £300m for development of small modular reactors alone	Each GW of nuclear power generation is enough to power 2 million homes with clean electricity
<b>So why from a nuclear power station in France?</b>	<b>So why from a nuclear power station in France?</b>	<b>So why from a nuclear power station in France?</b>





## **Why industrial, marine and military waste was dumped on eastern side of Portsea Island**

The proposed UK landfall of the cable will be at Eastney in Portsmouth.

Portsmouth, in common with other island and coastal cities, has had to deal with two pressing problems: the need for more land on an island of limited extent and the need to dispose of increasing volumes of waste materials as the city has grown.

Portsmouth chose the most obvious and practical solution to these two problems by filling the low lying marshy coastal fringes and creeks of Portsea Island with a wide variety of dockyard, industrial and municipal waste materials throughout the years. Although some landfilling took place in the 16th and 17th centuries, major landfill and reclamation did not become significant until mid-Victorian times, when the last major expansion of both the dockyard area and the city itself took place.

In the first 30 years of the 19<sup>th</sup> Century incinerators were used and the remaining waste was dumped in substantial creek/mudflat areas on the eastern side of Portsea Island. Wartime rubble was used to cap many of these fills, although later filling with municipal wastes sometimes occurred to raise the ground to more suitable levels.

Many of these sites lie along the planned route of the proposed Aquind Interconnector.

### **Locations along the proposed Aquind Interconnector route**

The currently planned route runs from Eastney through to Milton Common, then up the Eastern Road and then on to Farlington. Along this route there will be tunnelling and also deep trench digging.

### **Focus on Eastney and the "Glory Hole"**

The Glory Hole was an arm of Eastney Lake in the extreme southeast corner of Portsea Island, which was banded off and infilled by the Royal Navy between approximately 1914 and 1960. This location was "infamous" for its "decay and filth". A wide variety of naval scrap and waste materials were dumped into this muddy creek, including asbestos from boiler and armaments lagging, lead from submarine and other batteries, mercury from electrical switchgear, zinc and cadmium plated metal objects and a host of other, mainly solid, materials. No records of the wastes deposited are available.

The site was covered over with several centimetres of topsoil and given over to the building of naval married quarters which were constructed on the site between 1955 and 1965.





Some of these homes were subsequently declared surplus to RN requirements and were leased to the City Council for council tenancy during the mid-1980s.

In the late 1980s local building work on a new marina uncovered substantial contamination. Subsequent investigations showed significant quantities of asbestos and various toxic heavy metals close to the surface, under the grass cover, although the MOD declared, at the time, that health risks were minimal. In the early 1990s a further investigation was made and Portsmouth City Council decided the site was unfit for family habitation and immediately offered to rehouse families elsewhere. This decision ensured 'Lumsden Road' a place in contaminated land history.

A quantitative assessment confirmed near-surface lead and asbestos contamination to be the major hazards. Major work was then done to cover the ground and make it a safe place to live.

Aquind plan to land their interconnector literally across the road from Lumsden Road and then run it essentially around Eastney Lake before then heading to Milton Common.

### **Focus on Milton Common**

The site is a very large area of grassland, scrub and ponds located on the edge of Langstone Harbour, surrounded by homes, schools, a college and businesses. It is now a popular place for local residents to walk and exercise and is also a haven for wildlife within the city.

Milton Common wildlife diversity is graded as 'excellent', with nearly 200 species noted plus species designated as Nationally Rare, Nationally Scarce & County Scarce. The conservation value of the site is flagged as especially important due to the proximity to the internationally important Langstone/Chichester Harbours which are designated as SSSI, SPA, SAC and Ramsar sites.

Milton Common was subjected to phases of land reclamation by infilling in the 18th and Early 20th Century. However, the majority of the landfilling took place between 1962 and 1970 when a bund was constructed across the mouth of Milton Lake and the confined area was progressively drained and in filled with domestic refuse. There was next to no control on what could be dumped, with stories of a hill of old motorbikes, building waste from factories and bomb sites, leaking scrap vehicles and more.





In-person interview research conducted with local people shows the extent of the historical toxic waste dumped on Milton Common:

- “Walking my dogs there to see parts of cars & tyres showing through where the earth had eroded” – Leslie
- “A clear recollection of looking through cracks in the ground and seeing flames” – Ian
- “I am sure I remember seeing some wartime incendiary bombs” – Paul
- “I remember the methane gas burning for months” – Richard
- “A real scrap yard” – Alan
- “The soot from the power station chimney all this was dumped up there” – David
- “There was a ‘mountain’ of topsoil brought in early 70s to cover it over, but it’s only a few inches deep then it’s god only knows what underneath.” – Gary

A borehole drilled in 1992 by the University of Portsmouth identified up to 5m of landfill with a cap on top of 300-400mm of clay and topsoil, showing the depth and scale of waste on the site.

Aquind’s own Environmental Statement (18.5.4.83) states:

***“Exploratory holes at Milton Common during the 2018 investigation were commonly abandoned short of the 5m target due to obstructions, asbestos or underground metallic anomalies.”***

To mitigate, the report says additional mitigation measures should include trenching that:

***“...will need to be excavated in short lengths to minimise odour risk;” (18.9.2.3)***

Aquind want to cut right through the Common with a deep trench, with no one knowing what could be uncovered and released into the local environment.

### **Conclusion - Let’s not open a “Pandora’s Box” of contaminants**

Eastney and Milton Common are just two areas along the route that could cause contaminant issues, with others such as Tangier Road/Little Salterns and moving up to Farlington. Currently there is a balance of local residents and the harbour and wildlife, nobody wants Aquind to open “Pandora’s Box” full of unknown, toxic contaminants on our city’s doorstep.

**I am asking the Secretary of State to make the right decision for Portsmouth and stop the Aquind Interconnector.**





#### Sources:

Milton Common Management Plan (Draft) (2019-2024) by Portsmouth City Council

- 'The legacy of contaminated land in Portsmouth: its identification and remediation within a socio-political context' (1998) by N. R. G. Walton (Department of Geology, University of Portsmouth) & A. Higgins (Environmental Health Service, Portsmouth City Council)
- Aquind Limited: the Aquind Interconnector Local Impact Report (2020) by Portsmouth City Council
- Environmental Statement. Chapter 18 - Ground Conditions (Nov. 2019) by Aquind Limited
- Shanty Town article in The Evening News, (Portsmouth) 16th June 1966
- In-person interview research conducted by Paula Ann Savage 2022/23

#### SECTION 3B: ENVIRONMENTAL INFORMATION (TRAFFIC AND AIR QUALITY ISSUES)

##### **Examining the true adverse effects of the proposed on-shore construction corridor**

The Let's Stop Aquind group (LSA) agrees with the original decision to refuse this DCO application made by a former SoS for BEIS and for the reasons he listed as copied below:

*3.5. The Secretary of State notes that the ExA also considered at length the question of the planning balance under section 104(7) of the Planning Act 2008 i.e. whether the need for the proposed Development outweighed the planning harms inherent in the scheme and concluded that this was the case. The Secretary of State notes that the ExA identified planning harms associated with the scheme, which include less than substantial harm to the Fort Cumberland Scheduled Monument and the Grade II listed cottage known as Scotland, as well as impacts on tourism receptors, sports pitches, and the Victorious Festival. The compulsory purchase powers sought by the Applicant would also result in private losses and could cause delay to the North Portsea Island Coastal Defence Scheme due to the overlapping of construction compound areas between this scheme and the proposed Development. The proposed development also has other potential adverse effects which are summarised in the ExA's report in the consideration of the planning balance [ER 9.3]. The Secretary of State agrees these adverse effects weigh against the proposed development.*

*3.6. Given the adverse effects arising from the project and which have been noted above, and in particular the combination of impacts that result from the proposed landfall in an urban location, the Secretary of State considers that in the circumstances of this particular application it is exceptionally necessary to consider whether sufficient consideration has been given to whether there are more appropriate alternatives to the proposed route. In particular, consideration needs to be given to the alternative substations initially identified by the Applicant (and therefore alternative onshore routes avoiding the above harms) and whether these were adequately considered to determine whether the potential harms caused by the development from the selected route could have been avoided or reduced. In this regard the Secretary of State disagrees with the ExA's conclusion in relation to the*

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*consideration of alternatives and, as set out below, considers that there was a failure to adequately consider the original alternatives identified by the Applicant, such that it is not possible to conclude that the need for and benefits of the proposed Development would outweigh its impacts.*

**In the re-determination of this proposal by the SoS, LSA would comment that nothing has changed, in the intervening time, that affects that original decision to refuse the application by Aquind.**

For the SoS to approve this proposal, there would be a need to override Article 8 (respect for private and family life) and Article 1 of the First protocol (peaceful enjoyment of possessions) of the Human Rights Act 1998.

LSA would suggest the only perceived lawful exception to interfere with these human rights, would be 'the economic well-being of the country'. LSA say that that exception case has not been made out by this proposal and falls woefully short of that benchmark.

Aquind is a private company that makes this proposal for profit for themselves and any potential investors. It brings no public benefit.

Aquind could and should have chosen a less impactful route from the very start of this ill-conceived project. It is incomprehensible for anyone to think this project was a good idea in the ripping apart and causing havoc to a densely populated island City and in the entire 13-mile route from Eastney on Portsea Island to Lovedean in the South Downs. The impact on the entire route to people's lives, the habitat, wildlife and traffic congestion will be devastating over a very long period of time.

The ExA continually uses the word temporary; LSA would ask, what is temporary? A day, a week, a year, 2 years, longer? The word is meaningless in this large construction context where lives are adversely affected.

The examination was completed by the Planning Inspectorate on 08<sup>th</sup> March 2021. The submissions and ExA report are now 2 years old. LSA asks, are the examination documents and recommendations still accurate and relevant? The Book of Reference last version was submitted at Deadline 8 on the 02<sup>nd</sup> March 2021. Is that document still accurate as to the details of owner/occupiers along the entire route? Have the owners/occupiers been updated by Aquind? Have new owner/occupiers been made aware of the proposal? Was this data in the document ever dip-sampled to check on their accuracy?

Have new, locally decided, planning proposals and approved projects been taken into consideration at Bransbury Park (swimming pool, sports complex and GP surgery) and Tipner (large housing estate) which is adjacent to M275 corridor?





### **Highways and onshore traffic**

The ExA in its recommendations commented on the following:

*9.2.16. The ExA concludes that the Applicant has adopted a robust and proportionate approach to the highways and traffic assessment, and that the findings are generally sound.*

*9.2.17. The ExA is satisfied that the effects during operation would be negligible given the low generation of traffic.*

*9.2.18. Overall, the ExA considers there would be some temporary significant adverse effects on highways and traffic flows during construction. However, these temporary effects would be reduced to acceptable levels through the application of mitigation measures in the FCTMP and FTMS, as secured through the Recommended DCO.*

**LSA entirely disagree with these comments. Portsea Island is to the South of the route and is accessed by 3 roads, all of which are situated to the north of the island and are all within a 3-mile corridor width. Eastern Rd is to the East. The M275 to the west and the A3 in the middle.**

Local knowledge and experiences over several years have shown that a serious incident in any one of the three arterial roads causes very heavy congestion on the other two roads. Such an incident can cause serious gridlock on Portsea Island. In general day to day traffic the entry and exit points of these 3 roads are heavily congested at certain times of the day.

The main hospital and only accident and emergency unit for the Portsmouth and surrounding areas is located in the Cosham area of Portsmouth, on the mainland to the north of Portsea Island. Any heavy congestion or gridlock has serious implications in getting people to hospital in an emergency and could be possibly fatal for anyone in need of urgent treatment. Regrettably gridlock is a regular occurrence in Portsmouth ([for example this incident in 2022](#)) as a result of the very limited options for traffic - 3 roads – to get on and off Portsea Island. Portsmouth residents are simply astonished that this local knowledge has not been taken into account in the proposals and feel badly let down by the Planning Inspectorate and the planning process as a whole

LSA suggests that as the majority of the length of the Eastern Road is proposed to being used in the laying of the cables, this will cause prolonged lane closures and without doubt will cause daily traffic chaos over a long period of time, with traffic being deflected onto the other two main roads.

From Aquind's own submissions to the Planning Inspectorate, the size of the task in open trenching amounts to a 5-metre separation of the 2 pairs of cables, a 5-metre haul road for





construction vehicles, the sitting of large cable drums, winches, safety corridors and the 'laying apart' areas for top and the separated sub soil.

### **Air quality**

The ExA also comment in its report:

*At 9.2.20. There would not be any significant air quality effects during the operation of the Proposed Development. Any occasional maintenance requiring traffic management measures would be no more significant in relation to air quality than any other authorised utility work within the highway.*

*9.2.22. The Applicant's assessment indicates that any increases in air pollution from vehicular traffic, resulting directly from traffic management measures or potential diversions around any construction works, would not present a significant risk of breaching the exposure limits in the AQS*

*9.2.23. Similarly, construction traffic would only be present for a short duration in any one area during cable installation and would not cause a significant deterioration in air quality. Taken together with general traffic movements, the Proposed Development would not affect the ability of the local authority to comply with relevant Ministerial Directions.*

*9.2.24. The ExA considers the approach and evidence to be robust, and concludes that effects on air quality during the construction and operation stages have been properly assessed and that all reasonable steps have been taken or would be taken to ensure that air quality limits are not breached, in compliance with the requirements of NPS EN-1. Matters of air quality do not therefore indicate against the Order being made.*

LSA would like to again highlight our comments above regarding traffic congestion and potential gridlock. Such heavy traffic congestion will obviously have a detrimental effect on air quality, particularly in the Portsmouth area.

Portsmouth already has alarming air quality pollution levels where Defra has provided extensive direction to Portsmouth City Council requiring them to develop a clean air zone (CAZ) framework.

LSA would also like to highlight two particular areas of concern regarding health and air quality. These are at Fort Cumberland Rd and Milton Common which are directly on the route.

### **Fort Cumberland**

As you will read in detail elsewhere in this submission, this area was formerly a Ministry of Defence tip for dangerous, toxic substances including asbestos, toxic fluids and heavy metals. So much so, that in the 1990s whole families were urgently required to move out of their homes in that area and rehoused. This was to allow the removal of contaminated soil.







The former MOD tip was massive and originally serviced by dirt roads. Fort Cumberland car park is the exit pit for the HVDC cables, located directly behind where the HDD drilling under Southsea Leisure Park at the landfall of the cables at Eastney beach will take place. Fort Cumberland car park is opposite and near to those affected houses and contaminated land.

This drilling, trenching and installation of associated infrastructure within the car park and open trenching along Fort Cumberland Rd will cause a large area of this ground to be disturbed. At what health cost to local residents?

LSA asks, what will be the effect of that ground disturbance, in such a historically toxic area, in relation to people's health and the air quality? How much of the land was 'cleaned' back in the 1990's and to what depth? As deep as the proposed open trenching on Fort Cumberland Rd?

### **Milton Common**

Milton Common is entirely reclaimed land from Langstone Harbour. Again, in the 1960's this area was used as an amenity tip and vehicle scrapyards. It was infilled by household, industrial waste and scrap vehicles. It is now a popular recreational area with an infant school to the south, with a pre-school nursery and blocks of living accommodation to the west. The Common is rich with wildlife and their natural habitat.

LSA wishes to highlight that no one, and in particular Aquind Limited, has a single clue as to exactly what is buried underneath Milton Common. This is clearly why Aquind still, after all this time during the examination, maintain a requirement in the DCO for a 3-option route across the Common. They do not know what they will encounter in their open trenching. The protective clay cap, historically installed when the common was created, will be disturbed. It is a Pandora's box for health, habitat, wildlife and air quality.

LSA asks why there was no in-depth historical research made by the Applicant of these 2 specific areas at Fort Cumberland and Milton Common.

LSA therefore disagrees with the ExA's comments on ground conditions and contamination at 9.2.70 in their report:

**The ExA is content with the Applicant's finding that there would be no significant adverse effects associated with land contamination and ground conditions once mitigation measures had been applied. LSA disagrees fundamentally with this statement.**





### **Sports, leisure and recreational effects**

The ExA's comment at 9.2.30 of their report states that sports pitches in Portsmouth would be partially mitigated, but some uncertainty remains. Information gaps raise some doubt as to the effectiveness of the proposed mitigation.

To put this into perspective this relates to sports pitches, leisure and recreational areas at Bransbury Park (including a skatepark), The University of Portsmouth at their Milton campus and Eastern Rd sports pitches and Farlington pitches.

LSA would point that it is not just the loss of sports pitches. It is also access to car parking in the remaining areas/ pitches for players and spectators.

There is also highly likely to be disruption to access to the various sailing clubs and public slipways at Eastney, Locksway Rd at Milton and the sailing clubs and centres along the Eastern Rd during the construction period.

During the ExA examination a lot of debate was given to the fears and status of allotment holders in Milton. Their fears relate to the effects of the wide HDD drilling area required under their allotments, their personal safety, use of their vehicles during construction, the breakout of drilling fluids on their plots and any adverse effects that will have on their grown produce.

The ExA also comments on the following:

*9.3.4. The construction of the Proposed Development would result in significant, though temporary, effects on highway conditions and onshore transport during the construction phase, a local social inconvenience and economic impact that the ExA considers to be a factor of moderate weight.*

*9.3.5. Some residents living close to the construction works would experience temporary noise and vibration disturbance. The ExA attributes this minor negative weight.*

*9.3.9. There are also a number of issues which, on balance, do not weigh significantly for or against the Order being made including:*

- *air quality;*
- *EMF;*
- *the marine environment;*
- *shipping and navigation;*
- *biodiversity and nature conservation;*
- *design;*
- *trees;*
- *the onshore water environment;*
- *soils and land use;*
- *ground conditions and contamination.*





**LSA would respectfully suggest to the SoS, ExA and Aquind it is very much dependent on whether you actually live on the route or are affected by this proposal. Several 1000's of people who live on the route and every road user will be significantly affected by this proposal during its construction.**

### **The size of the problem in numbers**

From Aquind's own submission documents, LSA would like to highlight just some of the issues that will adversely affect people's day to day lives.

Across open land the construction corridor is required to be 23 metres wide. This includes a 5m separation between the two pairs of cables. A 5m haul road for construction vehicles. A 3m area for top soil. A 2m area for sub soil, two cable trenches for each pair of cables along with a 1m distance between each element and safety barriers.

The diameter of each HVDC cable is about the size of a DVD. The size of the cables on the cable drums range from 600-2000m. The 2000m cable drums are each 3m in diameter and weigh approx. 50 tons.

Each 2000m cable drum movement is classed as an abnormal load when being transported by road. This will necessitate safety vehicles in attendance. Traffic signage and controls North of the proposed route, in more rural areas, will have to be removed to accommodate the transporting vehicles to negotiate smaller roads and turnings.

To cater for the 4 HVDC cables on the entire route and associated infrastructure at each end, this will necessitate 100's of such abnormal load movements.

Typical construction corridors will require 3 lay-down areas for cable drums and equipment each measuring 100m x 50m.

Cable joint bays along the route are typically placed on verges, fields and car parks. Each joint bay requires a construction area of 15m x 3m with the actual joint bay measuring 6m x 3m. There will also be a requirement for an area of 15m x 5m for a joint bay workshop.

At HDD drilling launch and exit pits, it will require an area of 50m x 50m to accommodate the drilling and winches machinery. In normal open trenching it will require an area of 15m x 12m for the placing of cable drums and winches to pull the cable.

LSA say that this will cause huge disruption to footpaths, pavements and cycle routes along the entire route. There will be massive disruption to residents' on-road parking and disturbed access to private driveways.

Overall the proposal will cause significant disruption to people's lives, local businesses, work, social and school journeys.

Community action to stop the AQUIND Interconnector





### **Secondary sea defence bunds at Milton Common**

With regards to the 3 options over Milton Common, the most eastern option route, running north to south through the common, appears, according to the Applicant's land plans (submitted at deadline 7), to disturb or certainly impact upon the relatively recently installed secondary sea defence bunds. These were installed around the Langstone Harbour foreshore and on the land side the 3 lakes situated on Milton Common.

LSA believes this point needs to be defined by the Applicant prior to any re-determination decision being made.

### **Conclusion – the scale of the negative impacts on the city of Portsmouth is too great**

**Considering the scale of the above negative impacts of the Aquind Interconnector, LSA strongly supports a further refusal to grant the DCO. The current Secretary of State for the Department of Energy Security and Net Zero must not allow this harmful project to be realised and calls for him to do the right thing for Portsmouth and stop Aquind.**





## SECTION 3C: ENVIRONMENTAL INFORMATION – VISUALISATION OF THE IMPACT OF THE AQUIND INTERCONNECTOR

### Introduction

Many people have expressed to the previous SoS their deep concerns about the route of the Aquind interconnector - along highly congested, polluted and at times very narrow roads. The impact during construction is unimaginable. It will affect residents in many ways: gridlock, congestion, pollution, parking, delays of traffic and bus services, delays of ambulance services (for example from the South Central Ambulance Service NHS Trust station at the southern end of Eastern Road), schooling of young and older children, business loss and interference.

We drive, cycle, walk or travel by bus along the route regularly, sometimes several times a day, as this is the nearest access road for those of us residents living on the east side of the island. However, the decision about this project will be made in London, far away from the city of Portsmouth. Councillors, MPs and residents have repeatedly explained and highlighted the issues we are facing in our city and beyond. The Aquind interconnector has been the subject of statements in the House of Commons, was discussed in the press many times as a controversial issue. The Aquind interconnector was refused by the previous SoS because he felt that “alternatives have not been thoroughly explored as the harms outweigh the benefits. “

We invite the current Secretary of State, Grant Shapps, to visit Portsmouth to fully understand why we are against the Aquind Interconnector, why this route is WRONG, what it will do to the residents and environment. We have spent the last two and a half years raising awareness about the Aquind Interconnector. We do this because we know of the problems we face here in our local area, because we take our commitment for the environment seriously. We assure you that thousands of residents here feel the same and are deeply concerned.

The climate and biodiversity emergency has changed everything. Your government recognises the urgent need to reverse nature’s decline in the recent update of the Environmental Improvement Plan.

Please look at the photos below, to understand the negative impacts this project will have on Portsmouth and surroundings.

This visualisation helps to understand what impact the construction of the Aquind Interconnector would have on the second most densely populated city of UK and through Hampshire, a 13 miles route along some of the busiest roads in the UK with high rates of air pollution.

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Follow this link to a video made specifically to show the proposed route through Portsmouth and Hampshire: [REDACTED]

Alternatively follow this link to our website where you can find more detailed information: [REDACTED]

**There is only one decision to make. This project should be rejected.**





**Figures 1 & 2: Impact of cable route on Eastney Beach – loss of Fort Cumberland car park and Grade II listed building, blight from development of two Optical Regeneration Stations, each up to 4m high for the proposed Fibre-Optic Communications network**

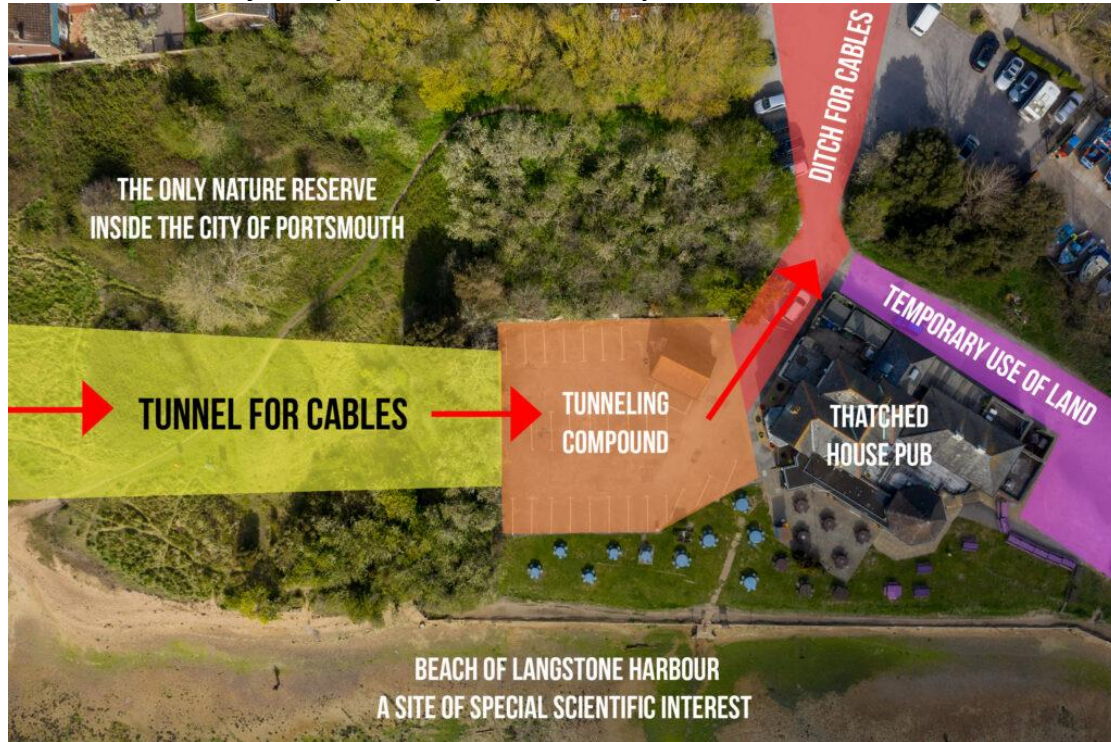


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**Figures 3 & 4: Impact of cable route on Milton Locks Nature Reserve, Langstone Harbour SSSI and Bransbury Park public space and skate park**



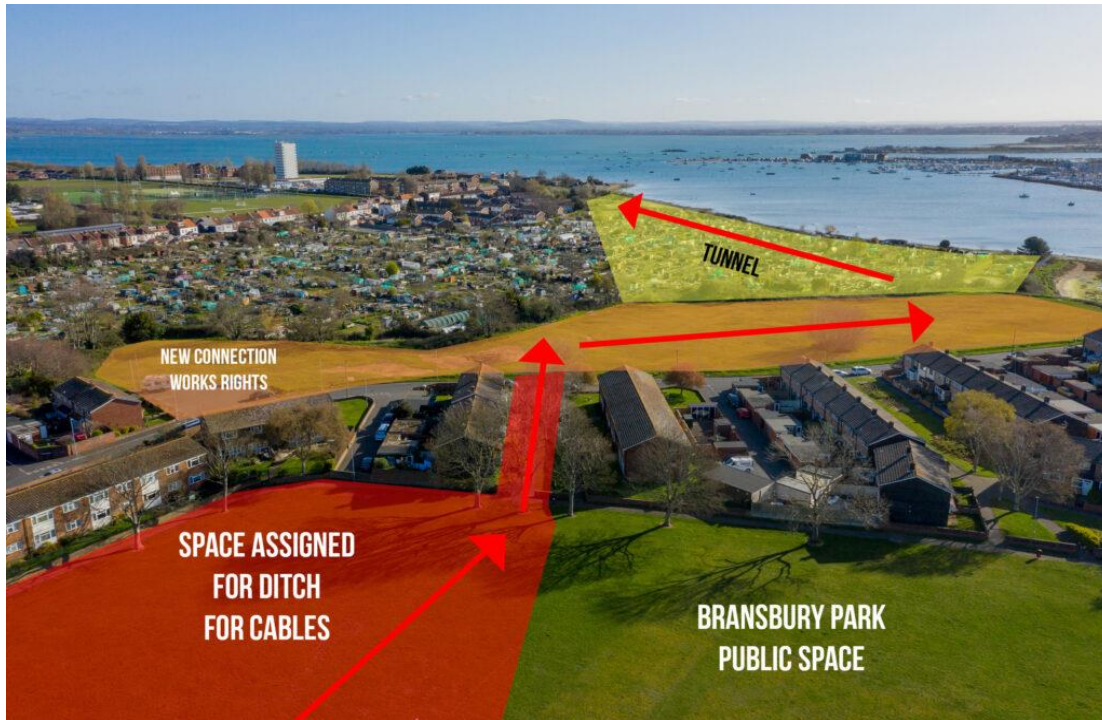
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**Figures 5 & 6: Impact of cable route on allotments, University of Portsmouth facilities, Moorings Way and the natural environment of, and toxic waste buried under, Milton Common**



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**Figure 7: Impact of cable route on car passengers, bus users, commercial vehicles and cyclists on Eastern Road, students and staff at Portsmouth College, response times at Eastern Road Ambulance Station, ambulance journey times to and from the A & E department at Queen Alexandra Hospital Cosham, shoppers at Ocean Retail Park, football fans travelling to Fratton Park, businesses based in Southsea or Burrfields Road Industrial Estate, sports and leisure users of the Outdoor Activity Centre and football pitches on Eastern Road**





**Figures 8 & 9: Impact of cable route on Farlington Marshes Nature Reserve, wading birds on Farlington Marshes seagrass meadows and Langstone Harbour SSSI, users of Farlington Marshes car park, sports pitches at Farlington and shoppers at Farlington Sainsbury's**



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**Figures 10 & 11: Impact of cable route on road users and residents in Farlington and Drayton, loss of public viewing point and parking for open space on Portsdown Hill**



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Figures 12 & 13: Impact of cable route and compulsory purchase of property and disruption to residents and road users in Purbrook, Widley and Waterlooville



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**Figures 14 & 15: Impact of cable route on local communities, businesses, road users and Fire Station response times in Waterloooville**



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**Figures 16 & 17: Impact of cable route on businesses, road users and retail shoppers in Waterlooville and Denmead and blight on green space, farmland, land values, and environmental issues caused by the works**



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**Figures 18 & 19: Impact of cable route green space and farmland, permanent loss and compulsory acquisition of land, loss of privacy and blight from development of 26m high Converter Station at Lovedean, with permanent impacts on farm owners, residents and the visual environment of the South Downs**



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SECTION 4: ANALYSIS OF PLANNED, APPROVED & PROPOSED INTERCONNECTOR CAPACITY AND THE NET EXPORT OF UK ELECTRIC POWER

**Planned interconnector capacity exceeds the 18GW UK Government target without Aquind**

In its recent [Powering Up Britain: Energy Security Plan](#), the UK Government reiterated its target to increase interconnection capacity to 18GW by 2030. Ofgem’s most recent data in the table below, shows a 2.1GW gap between the total capacity of approved projects and the target.

**Existing and future interconnector projects**

Below is a list of existing and future electricity interconnectors with GB regulatory approval. This doesn't include a pipeline of planned interconnectors that are under development but that we have not yet assessed.

As with other major infrastructure projects, future interconnectors face a range of challenges that can impact on timing of delivery. The estimated delivery dates shown below reflects our understanding in June 2021 of developers' plans.

Project name	Developers	Licensee	Connecting country	Capacity	Cap and floor regime?	Exemption?	Delivery date / estimated delivery date
IFA	National Grid Interconnector Holdings (NGIH) and RTE	National Grid Interconnectors Limited	France	2000MW	No	No	1986
Moyle	Mutual Energy	Moyle Interconnector Limited	Ireland	500MW	No	No	2002
BritNed	NGIH and TenneT	BritNed Development Limited	Netherlands	1000MW	No	Yes (Second Package)	2011
EWIC	EirGrid	EirGrid Interconnector Designated Activity Company	Ireland	500MW	No	No	2012
Nemo Link	NGIH and Elia	Nemo Link Limited	Belgium	1000MW	Yes	No	2019
IFA2	NGIH and RTE	National Grid IFA 2 Limited	France	1000MW	Yes	No	2021
NSL	NGIH and Statnett	National Grid North Sea Link Limited	Norway	1400MW	Yes	No	2021
ElecLink	Getlink	ElecLink Limited	France	1000MW	No	Yes	2022
Viking Link	NGIH and Energinet	National Grid Viking Limited	Denmark	1400MW	Yes	No	2023
Greenlink	Element Power & Partners Group	Greenlink Interconnector Limited	Ireland	500MW	Yes	No	2023
GridLink	iCON Infrastructure Partners III, L.P.	GridLink Interconnector Limited	France	1400MW	Yes	No	2024
NeuConnect	Meridiam, Allianz and Kansai Electric Power	NeuConnect Britain Ltd	Germany	1400MW	Yes	No	2024
NorthConnect	Agder Energi, Lyse, E-CO and Vattenfall	NorthConnect Limited	Norway	1400MW	Yes	No	2025
FAB Link	Transmission Investment and RTE	FAB Link Limited	France	1400MW	Yes	No	2025

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Aside from the Aquind interconnector, two new projects have progressed since this table was published, [Xlinks](#) and [LionLink](#).

These projects are on track to contribute to, and comfortably exceed the 18GW target set by the DESNZ. Xlinks is capable of closing the 2.1GW gap on its own, as it proposes the first of two 1.8GW interconnectors connecting a cluster of solar and wind farms in Morocco to Devon [to be in service by 2027, with the second coming online in 2029](#). This project has been designed with existing Photo Voltaic and wind turbine technology, and may complete sooner if emerging tech supersedes the planned design.

LionLink is a multi-purpose interconnector designed to connect the UK and the Netherlands with multiple wind farm clusters in the North Sea. The initial design allows for a 1.8 GW interconnector to join the UK grid.

Both the above projects have the advantage that they rely on truly green and sustainable sources of energy, unlike the failing estate of French nuclear power stations.





**In 2022, the UK became a net exporter of electric power to France**

The table below shows that in 2022, the UK became a net exporter of electricity to France. This is a dramatic turnaround from a long established pattern of importing power through interconnectors and reflects the parlous state of the French nuclear estate, France’s commitments to its EU neighbours post Brexit, and the change in strategic energy security priorities of the French government as a result of the Russia invasion of Ukraine. All these factors put pressure on the price of electricity in France, which has risen significantly. It also fundamentally undermines the case for the Aquind interconnector to provide 4-5% of the UK’s power needs, which now will be met by domestic sustainable sources for our own energy security. **There can be no justification to vandalise the environment of Portsmouth simply for a private company to sell UK power for private profit.**



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## SECTION 5: CONCLUSION

### **The importance of the French landfall site in relation to optioneering**

In order to make an informed determination on the matter of the Aquind interconnector DCO, the Secretary of State should first examine the basic case made in favour of the Eastney-Portsmouth-Lovedean route proposed by the Applicant. This choice of route relies on a French landfall site at Le Havre, and the subsequent need to limit the length of the cable both off and onshore for cost reasons. These were the justifications for the route that were given to, and accepted by, Mrs Justice Lieven in her recent High Court Judgement. With regard to optioneering, [Aquind's own literature](#) refers to "29 possible landing points being identified between Weymouth, in the west, and Bognor Regis, in the east", all of which would be relevant to a landfall site at Le Havre.

However, our research (Section 1 above) has found that Mrs Justice Lieven was entirely misinformed about the interconnector landfall site in France, which even at the time the judgement was made had been moved to the Dieppe area (some 90km to the east) by the Applicant. A simple glance at a map of the English Channel will show that the length of cables required to connect Dieppe and Portsmouth is considerably longer than the original route, fatally undermining the Applicant's claim for its optioneering priorities being led by the need to limit the length of the cables. Likewise, a simple glance at the map will show that a more logical range of UK landfall sites would run from Worthing to Folkestone, given the French landfall site is now so much further to the east, ruling Portsmouth out altogether. This makes Ninfield an obvious option, as it would reduce both the offshore and onshore cabling required, and of course the use of such a route would not create the same difficulties as the urban setting of Portsmouth.

It is worth restating that the Applicant has never looked at any sites further east than Bognor and that the optioneering process remains shrouded in secrecy, even from the Planning Inspectorate and the High Court, as the relevant National Grid documents have always been treated as commercially sensitive. We trust that the Secretary of State will re-examine the Applicant's siting process and the optioneering documentation in the context of the interconnector making landfall in the Dieppe area of France.

### **Has the Fibre-Optic Communications network been hidden within a Trojan Horse?**

Likewise, we trust that the Secretary of State will satisfy himself that the Applicant has acted transparently with regards to its motives for continuing to insist on the Eastney-Portsmouth-Lovedean route.

The issue of the Fibre-Optic Communications (FOC) network (and the huge optical regeneration stations it would require) remains unresolved, as do the concerns of residents

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that the HVDC cables are a "Trojan Horse" for a commercial FOC network on an enormous scale. The capacity of the network would be way beyond anything necessary to manage the power cables, add additional requirements in terms of on-shore buildings but offer no benefits to residents. No specific permission has ever been sought for such as network, so these questions will not subside.

### **The economic and social case for the Aquind interconnector - that was then but this is now**

As far back as 2014, the Applicant's stated intention has always been to use the interconnector to import (once plentiful) low-cost electricity from the nuclear power plants of Northern France. This would be sold into the UK grid (arbitraged) for the private profit of Aquind and its investors, and the company has been exempted from pricing regulation in order to enhance the profits from its investment. Put simply, the interconnector was designed to take advantage of the (then) lower cost of French power to meet 4-5% of the UK's energy needs, the project was subsequently treated as if it were a Nationally Significant Infrastructure Project (NSIP) in the UK and a Project of Common Interest (PCI) within the EU, and the Planning Inspectorate's Examiners went on to recognise the public benefit of the proposal on this basis.

However, the economic and social case for the interconnector has since collapsed for a number of significant reasons:

- **The French nuclear estate is in a state of decline and disrepair, with 2022 output at a 34-year low**
- **The price of power within France has risen dramatically since the start of the Russia-Ukraine conflict**
- **Brexit means that France no longer prioritises power exports to the UK, as it has commitments to provide energy to its EU partners**
- **Consequently, the French Government no longer recognises the Aquind interconnector as a PCI (see Section 2 above)**
- **The Prefet of Seine Maritime has refused permission for the project on environmental grounds (see Section 2 above)**
- **Importantly, UK Government policy has pivoted to developing our own sources of sustainable power for energy security, for example from off-shore wind**
- **[The Secretary of State for DESNZ's own recent announcement](#) expresses support for multi-purpose interconnectors such as LionLink which will provide 1.8GW towards the 18GW target from interconnectors by 2030**
- **[DESNZ has also expressed interest in the Xlinks project](#), which takes advantage of the combination of solar and wind power available in Morocco, will provide 3.6GW of renewable energy to the UK via an interconnector landing in Devon**
- **The UK became a net exporter of electricity to France in 2022**





As discussed in Section 4, LionLink and Xlinks have effectively rendered the Aquind interconnector obsolete, as unlike ageing nuclear power plants, they offer truly green, sustainable and reliable sources of energy and alongside existing and approved projects the 18GW target would be easily exceeded (see the table in Section 4 above), but it is the last reason that is so damning for Aquind...

The whole "raison d'être" of the Applicant's project (and justification for the devastation of Portsmouth and the South Downs), was to supply the UK with the unmet need of 4-5% of its total power requirements, with a subsequent saving to each consumer of £3.15 per year according to Aquind's own figures. However, it is now becoming apparent that Aquind is set to profit from the export of UK electricity as our green energy capacity exceeds our requirements, invalidating the Applicant's case for providing a social benefit. It is completely unacceptable to the citizens of Portsmouth and along the route that our communities are threatened and environment vandalised so that a private company can export UK power for its own benefit. This is truly a project that offers our citizens nothing while causing untold damage to our mental and physical health, our livelihoods, our air quality and our visual and natural environment.

**Nothing has changed in one important respect – the harms still outweigh the benefits**

Regardless of the dramatic changes in the circumstances and context of the proposal listed above, all of which have eroded away any justifications for this interconnector, the Secretary of State must continue to recognise the harms to Portsmouth posed by the DCO. The risk of disturbing highly toxic waste (detailed in Section 3a and [examined in this video](#)) is so high yet the Applicant has barely addressed it. Further deterioration to our already dangerously poor air quality in the city from the enormous number of heavy load movements required for construction has been also simply been ignored by both the Applicant and the Examiners. The additional pollution from traffic jams caused by contraflows and road blockages during construction (for example along the Eastern Road, one of only 3 routes onto our island city) has not even been estimated, nor has the likelihood of the works causing gridlock across Portsmouth and beyond, which would create real risks to the physical and economic health of the entire area.

The [flythrough video here](#) shows how homeowners, communities, sports enthusiasts, farmers, businesses and users of important public spaces such as Milton Locks nature reserve, Bransbury Park, Milton Common, Langstone Harbour SSSI and the South Downs would be affected by the Applicant's plans, either for years as the cables are laid or permanently from the blight caused by the buildings required. Our populations of wading birds may never recover from the disturbance to their habitat, the migrating species such as





Brent Geese may never return. No-one can guarantee the safety of tunnelling or trenching through the toxic waste along the route - the risks of these proposals are simply too high.

That is why the former Secretary of State was right to rule that the harms outweigh any benefits of the DCO. An urban environment, especially the second most densely populated city in the UK, especially an island city with such a delicate shoreline ecology and especially a city that has a history of dumping toxic waste a few metres underground, is simply not an appropriate place to lay interconnector cables by trench or tunnel.

**The Secretary of State is required under NPS-EN1 to consider alternatives (to quote the Planning Inspectorate's Recommendation report) "if an application gives rise to adverse impacts" and we have shown that this proposal poses a serious threat to our health, the environment and the economy of the Portsmouth area. These are cables that we do not want and do not need, for private profit not the public good.**

**The risks to our city of these proposals are simply too great, while clear, and as yet un-examined, alternatives exist. The risks to our national security must also be taken into account - the installation of a private communications network in the home of the Royal Navy is not a gamble we need to take - so we trust that you will make the right decision and protect our city and country from the Applicant's proposals. The original decision was correct and remains so. There are no justifications to change it, and our communities would never forgive you.**

Viola Langley and Ian Daye, on behalf of Let's Stop Aquind, 28 April 2023.

