

To The Secretary of State of Energy Security and Net Zero and to whom ever else is concerned in the re-determination of the Aquind proposal.

I am a resident of Portsmouth and I was classified as an interested party in my previous submissions to the Planning Inspectorate and the SoS.

I agreed 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. I think it is very important to remember them:

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 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, I would suggest that nothing has changed, in the intervening time that affects that original decision, to again refuse the application by Aquind.

For the SoS to approve this proposal, there would be a need to consider 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.

I would suggest the only perceived lawful exception to interfere with these human rights, would be 'the economic well being of the country'. I would say that that 'exemption' case has not been achieved 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 to the people of Portsmouth. Quite the reverse. Aquind wrote an open letter to The Portsmouth News on 06th April 23 stating that if the project is permitted to proceed that the current ownership structure will change radically with new investors; well known UK and international institutions.

At this stage, is that transparent to the people of Portsmouth? Who would become accountable and liable for the project with this 'radical restructuring'? Portsmouth City Council vehemently, across all political parties, unanimously, don't want the project.

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 Southdowns. 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 and Aquind continually uses the word temporary in their reports; I would ask, what is temporary? A day, a week, a year, 2 years, longer? The word is meaningless in the context of a large scale construction and where lives will be adversely affected for prolonged periods of time.

The examination was completed by the Planning Inspectorate on 08th March 2021. The submissions and ExA report are now 2 years old. I ask, are the examination documents and recommendations still accurate and relevant? The Book of Reference last version was submitted at Deadline 8 on the 02nd 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 document ever-dip sampled to check as to its accuracy?

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

The ExA in their recommendations commented on the following:

Highways and onshore traffic

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.

I 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 width corridor. Eastern Rd is to the east. The M275 to the west and the A3 in the middle.

Local knowledge and experiences over several years has 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 and has caused serious gridlock on Portsea Island. In general day to day traffic the entry and exit points of these 3 roads are heavily congested at peak 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. This is 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.

I suggest 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 any doubt whatsoever 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 requirement of areas for large cable drums, winches, safety corridors, abnormal load movements and the 'laying apart' areas for top and separated sub soil.

Air quality

The ExA also comment in their 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.

I would like to again highlight my 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 Portsmouth City Council have had to develop a clean air zone (CAZ) framework.

I 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 a child, I use play in this area. The 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 to be 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 intended exit pit for the HVDC cables. This is located alongside the HDD drilling area under Southsea Leisure park where 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?

I ask, what will be the effect of that deep 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 before people were allowed to live there again? **Was the soil cleaning as deep as the proposed open trenching on Fort Cumberland Rd and the car park?**

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 on Moorings Way, a pre-school nursery and blocks of living accommodation to the west bordering the Eastern Rd. The Common is rich with wildlife and their natural habitat.

I would like to highlight that no one has a single clue as to what is buried underneath Milton Common. This is clearly why Aquind still, after all this time during the process, maintain a requirement in the DCO for a 3 option route across the Common using a combination of any of the 3 routes. 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 people's health, habitat, wildlife and air quality.

I ask why there was no in-depth historical research made by the applicant of these 2 specific areas at Fort Cumberland and Milton Common. What were the results of any test drillings in these areas.

I therefore disagree 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.

I disagree fundamentally. What possible mitigation is there when you've already exposed the problem.

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 Milton campus, the Eastern Rd sports complex and pitches at Farlington Marshes.

I would point out that it is not just the loss of the actual playing 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 over the drilling area during construction, the breakout of drilling fluids on their plots and any adverse effects that will have on their grown produce.

The ExA also comment 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.

Temporary? Inconvenience? Minor? I 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, I highlight just some of the issues that will adversely effect 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 larger cable drums are each 3m in diameter and weigh approx 50 tons.

Each large 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 to the 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. How will these transportations be catered for in the tight small roads on Portsea Island. Where will they be stored? How will that affect local traffic during their movement?

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.

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.

Disruption to peoples lives, local businesses, work, social and school journeys.

Secondary Sea Defences 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 applicants 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. I think this route needs to be actually defined by the applicant prior to any re-determination decision being made. Will it affect any of the 3 lakes or their water quality? Will it affect the ongoing coastal defence construction? There is no room on Milton Common for a trial and error carve up on it, in what the applicant called 'optioneering'.

Considering the scale of the above adverse impacts of the Aquind Interconnector, I strongly support a further refusal to grant the DCO. The current SoS of the Energy Security and Net Zero department must not allow this harmful project to be realised.

Thank you.

Ian Daye.

