

## Atkins, Caelan

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**From:** Janet [REDACTED]  
**Sent:** 26 July 2023 09:36  
**To:** Aquind Interconnector  
**Cc:** [REDACTED]; [REDACTED] Pitt, Steve (Cllr); Vernon-Jackson, Gerald (Cllr); Barrett, Kimberly (Cllr); Sanders, Darren (Cllr); [REDACTED]@portsmouthcc.gov.uk; cllr.[REDACTED]@portsmouthcc.gov.uk  
**Subject:** AQUIND Interconnector:- Nationally Significant Infrastructure Project  
**Importance:** High  
**Categories:** Consultation Response

AQUIND Interconnector Team

Unique Reference 20025182

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

The Milton Neighbourhood Planning Forum previously wrote to the Planning Inspectorate as an "Interested Party" in February 2020; May 2020; on 16<sup>th</sup> November 2021; on 5<sup>th</sup> December 2021 and again, on 30<sup>th</sup> March 2023, the latter in response to the High Court Judgement of 24<sup>th</sup> January 2023.

We have always rejected AQUIND claims that it is necessary to make landfall in Portsmouth for a Cross-Channel HV Electricity Interconnector to link with a Converter Station at Lovedean. Our original response to PINS in 2020 was as follows:- "*We question the applicants motives for choosing a route through the UK's most densely populated City creating huge disturbance when a far easier route could be chosen along a footpath & bridleway on the former Hayling Island Railway on the east side of Langstone Harbour. This was the approximate route of an HV O/head Cable in the 1960's*".

We have been invited yet again to make further comments, this time by 28<sup>th</sup> July 2023, but only in respect of the responses of 28<sup>th</sup> April 2023 by Portsmouth City Council and NGET/NGESO respectively.

The selection of Portsmouth as a chosen route is again, identified by PCC in their April 2023 letter, as a manifestly disruptive option. The ExA in determining Portsea Island as the preferred route concluded there was a "*compelling case*" to do so. The High Court Judgement at para 10 e) only states the need case has been clearly made. It doesn't say the need is satisfied by a route through Portsmouth.

Where a simpler alternative route to accommodate HV Cables exists only half a mile away on Hayling Island avoiding digging up roads, footpaths, allotments, green-spaces and sports fields in Portsmouth, a "*compelling case*" ought to be capable of justification. PCC's letter of 28<sup>th</sup> April is reaching the same conclusion where, under paragraphs 1.6 to 1.11, it requests the Sec of State consider the disbenefits of "mitigation" of harm from contamination on Public Allotments and Public Open-Space loss as being significant and material, in addition to all those other disruptions they identify.

Nothing in NGETs/NGESOs response is relevant. We know why it refers to the limitations of the Mannington site as a potential Converter Station. We know why Justice Lieven Allowed the AQUIND Appeal to the High Court in January of this year. None of it means Portsea Island is suitable.

The High Court's Judgement at para 46 a) to d) only describes the legal process in considering alternatives whereas the true test of significance requires at least a degree of evaluation of benefit and harm. Without sight of a Feasibility Study to describe and evaluate alternative options, a Project risks abortive expenditure and wastage of resources. It wasn't presented to J Lieven; the Sec of State hasn't seen it (despite asking); PCC hasn't seen it; and we certainly haven't.

We questioned why Lovedean had been selected at all in our Objection of 30<sup>th</sup> March 2023. PCC is effectively challenging that site's selection too because in their letter at para 2.2, they support the Sec of State's request for information on the Feasibility Studies. How else could a justification of significant benefits outweighing harm be reasonably made. These are critical to an understanding of the entire Project.

A Feasibility Study of 2014/15 to lay and construct a Cross-Channel Interconnector from Portsmouth without an agreed landfall in France is at best peculiar and at worst, a fundamental project oversight. It may be the reason for its absence.

Returning to our Objection of 30<sup>th</sup> March, and the absence of the Feasibility Study, may we remind the Sec of State that Le Havre has not yet been selected as landfall site near which a Converter Station might be built. Dieppe is also named as a potential landfall area close to where a Converter Station may be built (should the French ever decide they want another Interconnector).

May we also return to our related comments of 30<sup>th</sup> March where we introduce Ninfield as a potential alternative site for a UK Converter Station. NGET has a station at Ninfield four miles north of the East Sussex coast at Bexhill and only seven miles east of the Converter Station "Search Arc". There's no explanation as to why the arc shouldn't extend a further seven miles. The absence of the Feasibility Study means the Sec of State, the Council and ourselves are prevented from understanding why. It's important because the Ferry crossing from Portsmouth to Le Havre takes 5hrs 30 minutes whereas Newhaven to Dieppe takes only 4 hrs. Newhaven is as equidistant from the French coast at Dieppe as Bexhill is to Dieppe. We and PCC are led to believe the major costs incurred in the project are incurred with subsea cable laying and maintenance. It seems counter-intuitive to consider Portsmouth with a 35% greater distance to the French Coast than Bexhill.

We agree too with PCC, the absence of a justification for the Commercial Fibre Optic Cabling also compromises the choice of Portsmouth as the preferred route. As identified by PCC, it's not as if the Application for Development Consent was ever meant for communications infrastructure anyway. Bearing in mind Portsmouth has just undergone major disruption to highways and footpaths with the introduction of "City Fibre", it's also counter-intuitive it be considered as essential to the Project that commercially available Fibre Optic Cables would be of benefit to Portsmouth residents and businesses.

Clearly the AQUIND project requiring a route through Portsmouth cannot be described as urgent requiring NSIP status if, nearly ten years later, the French landfall site remains undefined.

If neither Le Havre or Dieppe are determined as required by the French, it's even more counter-intuitive AQUIND be granted landfall rights in Portsmouth for a connection to France.

### Summary

1. Portsmouth is the worst location on the South Coast to choose as a landfall site for an HV Interconnector.
2. DCO consents should only be used for their primary purpose. Data Cabling rights can be secured by other means.

3. All Public Projects require transparent Feasibility Studies. All Projects carry risks. Those that aren't feasible carry the greatest.
4. We doubt Lovedean is the best site for a Converter Station when Ninfield is closer to France.
5. It is premature to grant a DCO with Compulsory Acquisition rights to lay Cross-Channel cables in advance of securing the requisite consents in France.
6. We do not trust AQUIND.

This DCO application should be **REFUSED**.

Yours sincerely

Rod Bailey and Martin Silman  
Milton Neighbourhood Forum  
representing 14,000 residents in Milton and Baffins Wards

supported by Councillors:-

Steve Pitt Leader of Portsmouth City Council and Milton Ward Councillor

Gerald Vernon Jackson (Milton Ward)

Kimberly Barrett (Milton Ward)

Darren Sanders (Baffins Ward)

Abdul Kadir (Baffins Ward)

Leonie Oliver (Baffins Ward)

26<sup>th</sup> July 2023