

Atkins, Caelan

From: Janet Dennis [REDACTED]
Sent: 26 July 2023 21:40
To: Aquind Interconnector
Cc: viola langley; Jonathan Walker
Subject: The SOS's 23 May request for any further comments from Interested Parties. Questions regarding the French landfall.

Categories: Consultation Response

Planning Inspectorate,
Dear inspectors,

I write further to the Secretary of State's request on 23 May 2023 for any comments from Interested Parties to matters contained in his request of 3rd March 2023 and the information contained in AQUIND Ltd's response dated 28th April 2023.

I fully support Portsmouth City Council's latest submission dated 4th July 2023. I would like to further underline one issue in particular.

Throughout the two-day High Court hearing in November 2022 several of us from the campaign group, Let's Stop Aquind, heard Mrs Justice Lieven refer repeatedly to Le Havre as the French landfall, a crucial error that was not contradicted by Aquind's lawyers at any point. Aquind have in the past claimed they chose to land their cable at Portsmouth as it was the shortest route from Le Havre but at least two years ago Aquind had decided that Pourville-sur-Mer near Dieppe, 50miles east of Le Havre, would be the French landfall. Fecamp, which lies approximately midway between Dieppe and Le Havre, was also considered back in 2015.

Aquind's Response to the Responses of Interested Parties, dated June 2023 states, and I quote:-

'3.1 The landfall for the Project has consistently been identified by the Applicant as being at Pourville-sur-Mer in the commune of Hautot-sur-Mer in Seine-Maritime Department of the Normandy region in northern France, or at nearby Dieppe where a landfall was also considered during optioneering.

3.2.4

A landfall location in France near to Dieppe was first explained publicly in the UK during the first round of consultation undertaken on the Proposed Development in January 2018.

3.3 It is correct that reference was made to Fecamp as being used in early 2015 as an assumed French Landfall for the purpose of facilitating an assessment of the technical, geographic and environmental considerations relevant to the three shortlisted substations in the UK The same paragraph identifies that the assumed UK landfall for the purpose of facilitating this assessment was East Wittering.' End of quote.

Pourville-sur-Mer to Portsmouth is definitely not the shortest route; from the Dieppe area that would be Ninfield, north of Bexhill-on-Sea.

Why then does Mrs Justice Lieven refer to the landfall as Le Havre during the hearing and also in her judgement? Why was this not corrected? Where did that misinformation come from? Was it stated in the mountain of documentation submitted to Justice Lieven by Aquind's lawyers? Was this a genuine error on Aquind's part or misleading? Either way the judgement was based on a false premise. Does this not invalidate it? Please see point 9 of the Aquind Judicial Review judgement. I quote:-

'The Facts

9. The interconnector is intended to bring electricity from France to link into the UK network. The nature of the project is that neither end point is fixed. In broad terms the elements of the project are the exit point on the

French coast; the subsea cable; the landfall site in the UK; and the substation which allows the interconnector to link into the UK high voltage power network. Two important considerations in the planning of the scheme were the cost of the cable, and therefore the desirability of minimising length; and the need to minimise the crossing of busy shipping lanes. These factors, amongst others, led to a location near Le Havre for the landfall in France.' End of quote.

As shown, Aquind's intended French landfall is actually Pourville-sur-Mer, 50 miles east of Le Havre, far from the shortest route. Above all, neither Fecamp nor Pourville-sur-Mer are Le Havre!

Therefore is Justice Lieven's decision to overturn the previous Secretary of State's decision not seriously flawed?

Thanking you,
Jan Dennis, member of LSA comms group.

<https://stopaquind.com>

Sent from my iPad