FORMAL OBJECTION

AQUIND INTERCONNECTOR

Objection, Supplementary Grounds and Technical Annex

Submitted to: The Secretary of State
Project: AQUIND Interconnector (EN020022)
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Address: [redacted]
Date: 12 November 2026

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1. Purpose and status of this submission

This document sets out a formal objection to the proposed AQUIND Interconnector. It consolidates principal objections, supplementary grounds and a technical annex identifying matters requiring independent verification. It should be read alongside the earlier objection submitted by the objector via the email this has been submitted with.

The concerns below are not assertions that every proposed construction method will necessarily fail or cause harm. They identify material risks, uncertainties and information gaps which must be properly investigated and resolved by the applicant and decision-maker before consent could responsibly be granted.

2. Principal objection

I oppose the AQUIND Interconnector in its proposed form and location. I consider that the project has not demonstrated that its claimed public benefits outweigh its risks and burdens for Portsmouth, its residents, its infrastructure, its environment and the United Kingdom.

- An energy infrastructure project should serve demonstrable public need and resilience, rather than principally private commercial returns.
- The case for additional interconnector capacity must be tested against actual supply security, demand, existing and planned interconnections, and the availability and reliability of electricity during periods of stress.
- Project costs, financing, ownership, risks and long-term liabilities require transparent scrutiny.
- Portsmouth would bear substantial construction disruption and potential long-term constraints, while the claimed benefits are not shown to be proportionate to those local burdens.
- Potential effects on national security, flood defence infrastructure, groundwater, habitats, public health, traffic and emergency access remain serious concerns.

3. Energy need, security and economic justification

The applicant's capacity claims should not be equated with guaranteed electricity supply. An interconnector transports electricity when it is available and commercially or operationally deliverable; it does not itself create generation or guarantee availability during simultaneous shortages, outages or constrained market conditions.

The Secretary of State should require clear evidence of the project's contribution to UK energy security, including realistic scenarios for peak demand, low generation, outages, market conditions, and the role of existing and proposed interconnectors. The assessment should address the economics of the project, costs to consumers, alternatives and the extent to which benefits are public rather than private.

The concerns raised in Ofgem's November 2024 Initial Project Assessment, including its red rating and questions about economic benefits and costs, warrant careful consideration. The timing and uncertainty of commissioning, including the reported potential French-side timetable, should also be reflected in any assessment.

4. National security and His Majesty Naval Base (HMNB) Portsmouth

Portsmouth is home to HMNB Portsmouth, a strategically important naval base. Ministry of Defence concerns about the project's potential to impede or compromise safe and effective use of the base are of exceptional significance and cannot be treated as an ordinary planning issue.

The Secretary of State should obtain and consider the full relevant security and operational assessment, establish whether concerns have been resolved to the satisfaction of the competent authorities, and explain transparently, subject to legitimate security restrictions, how those concerns have been addressed. Consent should not proceed while material national-security or operational risks remain unresolved.

Ownership, financing, control, data/fibre infrastructure and foreign-linked interests should also be assessed through appropriate national-security processes. Any safeguards must be enforceable throughout the project's lifetime.

5. Construction, traffic and public safety

The construction programme risks prolonged disruption across Portsmouth, including road closures, diversions, congestion, noise, dust, vibration and restricted access. These effects may be cumulative with other infrastructure and coastal-defence works.

- Require a credible, independently reviewed construction traffic and logistics plan, with realistic sequencing and enforceable limits.
- Demonstrate that emergency-service routes, access to hospitals, homes, businesses and essential facilities will remain available.
- Assess cumulative disruption, not merely individual worksites or short-duration peak impacts.
- Provide monitoring, complaint handling, restoration standards and enforceable remedies for damage or disruption.
- Explain how residents and businesses will be informed and consulted throughout construction.

6. Flood defences, HDD and ground conditions

The proposed use of Horizontal Directional Drilling (HDD) beneath or near coastal flood defences, watercourses and sensitive ground requires detailed and site-specific scrutiny. HDD can reduce surface disturbance, but it does not eliminate risks associated with drilling fluids, ground instability, groundwater pathways, settlement, breakout or future maintenance.

Particular attention is required at Broom Channel (HDD-3) and Milton Common (HDD-6), and in relation to the North Portsea Coastal Scheme and other Portsmouth coastal-defence works. The project must demonstrate that construction and operation will not undermine existing defences, obstruct future upgrades, compromise flood-risk management or create unacceptable maintenance constraints.

The converter station and associated works also require robust assessment of chalk geology, groundwater and the relevant source protection arrangements, including concerns raised by the Environment Agency and water-supply stakeholders. Independent verification, not reliance solely on applicant assurances, is essential.

7. Environment, health and community impacts

The assessment should fully address impacts on residents' health and quality of life, including construction noise, dust, vibration, air pollution, traffic, access and prolonged disruption. It should assess effects on habitats, watercourses, allotments, Milton Locks Nature Reserve and other sensitive locations, including indirect and cumulative effects.

The use of underground routes through or near allotments and nature areas must be accompanied by clear evidence on construction footprint, reinstatement, monitoring, access, future maintenance and restrictions on deep excavation or piling above the cable corridor.

The Secretary of State should ensure that environmental mitigation is specific, funded, enforceable and subject to independent monitoring, with clear responsibility for remediation and compensation.

8. Governance, transparency and evidence

The decision should be based on complete, accessible and independently scrutinised evidence. Any relevant feasibility studies, technical assessments, risk registers, modelling assumptions and responses to statutory consultees should be identified and made available to the extent legally possible.

Where information is withheld for security or other legitimate reasons, the decision-maker should still ensure that the substance of the issue is independently tested and that the public can understand the basis on which it has been resolved.

The project should not benefit from uncertainty created by incomplete evidence. The applicant must demonstrate that the proposal is necessary, safe, technically sound, environmentally acceptable and in the public interest.

9. Requested action by the Secretary of State

I respectfully request that the Secretary of State refuse development consent for the AQUIND Interconnector because the serious concerns identified in this objection have not been satisfactorily resolved.

Alternatively, if the Secretary of State considers further examination appropriate, I request that consent not be granted unless and until a comprehensive, independent and transparent investigation has:

- verified HDD designs and their interaction with flood defences, groundwater, geology, culverts and existing infrastructure;
- assessed cumulative construction, traffic, emergency-access, environmental and community impacts;
- independently tested the energy-security case, economic justification, financing and long-term liabilities;
- resolved Ministry of Defence and national-security concerns to the satisfaction of the relevant competent authorities;
- reviewed relevant feasibility studies and outstanding evidence, with meaningful disclosure and consultation;
- established enforceable safeguards, monitoring, financial security, remediation and compensation arrangements.

The burden of demonstrating that this project is safe, necessary, economically justified and in the public interest rests with the applicant. It should not be transferred to Portsmouth residents or those who would bear its consequences.

I ask the Secretary of State to uphold the refusal of consent, or at minimum ensure that all material issues are independently and demonstrably resolved before consent is contemplated.

Technical Annex A – Engineering and infrastructure evidence requests

This annex identifies technical matters for independent examination. It is intended to frame evidence requests and scrutiny; it does not presume that a particular failure will occur.

A1. HDD-3: Broom Channel and coastal flood defences

- Provide the final surveyed alignment, entry/exit points, drilling profile, depth, tolerances and as-built verification plan.
- Demonstrate clearance from defence structures, foundations, seepage paths and future defence-upgrade footprints.
- Provide geotechnical and hydrogeological data, drilling-fluid design, pressure controls, breakout contingency and monitoring.
- Explain how the works will avoid settlement, damage, leakage or impairment of flood-defence performance during construction and operation.

A2. HDD-6: Milton Common and coastal defence interfaces

- Provide equivalent detailed alignment and risk information for Milton Common, including interaction with planned or existing coastal works.
- Assess alternatives and explain why the selected route is preferable in engineering, environmental and community terms.
- Address historical ground conditions, potential made ground/landfill influences where relevant, groundwater and drilling-fluid migration.

A3. Cumulative coastal-defence schemes

The North Portsea Coastal Scheme extends approximately 8.4 km and is being delivered in phases, alongside other coastal-defence works. The project assessment should map AQUIND construction and permanent infrastructure against all relevant schemes, programmes, access routes and future maintenance areas.

- Provide a coordinated programme and spatial overlay of AQUIND and coastal-defence works.
- Demonstrate that construction compounds, drilling operations and cable corridors will not obstruct defence construction, inspection, maintenance or future raising/strengthening.
- Assess cumulative effects on flood risk, construction traffic, residents and businesses.

A4. Groundwater, chalk geology and water supply

- Provide site-specific groundwater levels, flow direction, seasonal variability and hydrogeological modelling.
- Assess preferential pathways, fractures, contamination mobilisation, turbidity and impacts on groundwater-dependent receptors.
- Address the converter station's location in relation to source protection arrangements and the Bedhampton/Havant springs, including consultation with relevant water undertakers.
- Specify baseline monitoring, trigger levels, incident response, stop-work criteria and independent reporting.

A5. Drilling fluids and HDD failure scenarios

The assessment should include inadvertent returns, loss of circulation, bore instability, collapse, settlement and fluid migration. It should identify realistic worst-case scenarios, detection methods, response times, containment measures and responsibilities.

- Provide a drilling-fluid management plan and material safety information.
- Set measurable monitoring and stop-work thresholds.
- Explain how any breakout or ground movement would be detected and reported.
- Provide a funded remediation plan and independent verification after any incident.

A6. Culverts, watercourses and drainage

Where detailed design of culverted crossings or drainage interfaces is deferred, the Secretary of State should require sufficient information before consent or impose tightly defined, enforceable requirements that prevent material impacts from being left to post-consent discretion.

- Identify every crossing, structure, culvert and drainage asset affected.
- Provide hydraulic capacity, structural condition and construction-method assessments.
- Demonstrate no unacceptable loss of capacity, obstruction, damage or increased flood risk.
- Set out inspection, reinstatement and long-term maintenance responsibilities.

A7. Allotments, nature areas and surface impacts

HDD beneath Milton and Eastney Allotments and Milton Locks Nature Reserve may avoid some direct surface works, but does not by itself resolve access, drilling-site, groundwater, noise, ecology, reinstatement or future maintenance impacts.

- Identify all surface compounds, access routes, working areas and temporary land requirements.
- Provide ecological surveys and seasonal constraints where relevant.
- Set out reinstatement standards, monitoring and independent sign-off.
- Clarify permanent easements and restrictions on deep excavation, piling or other works above the cable corridor.

A8. Maintenance, monitoring and liability

- Provide a lifetime inspection and maintenance plan, including access arrangements and foreseeable excavation requirements.
- Define responsibility for damage to flood defences, roads, utilities, private property and environmental receptors.
- Require appropriate bonds, insurance or other financial security for remediation and compensation.
- Establish independent monitoring, public reporting, incident notification and enforceable corrective action.

A9. Technical evidence schedule

Ref	Evidence required	Purpose
T1	Final HDD alignment/profile and tolerances	Verify clearances and constructability
T2	Geotechnical and groundwater baseline/model	Assess ground, water and pathway risks
T3	Drilling-fluid and inadvertent-return plan	Test containment and response
T4	Flood-defence interface and upgrade compatibility	Protect defence integrity and future works
T5	Cumulative coastal scheme programme/map	Avoid clashes and cumulative impacts
T6	Culvert/watercourse asset schedule	Protect drainage and hydraulic capacity
T7	Water-supply/source-protection assessment	Protect groundwater and public supply
T8	Construction traffic/emergency access plan	Protect public safety and access
T9	Ecology, allotment and reinstatement plans	Mitigate local environmental impacts
T10	Lifetime maintenance and easement plan	Clarify future restrictions and access
T11	Independent assurance and monitoring protocol	Verify compliance and detect impacts
T12	Financial security and remediation arrangements	Ensure liabilities can be met

Appendix – Key references

1. **Ofgem, Window 3 Initial Project Assessment Decision (November 2024) —** https://www.ofgem.gov.uk/sites/default/files/2024-11/Window_3_IPA_Decision.pdf
2. **AQUIND, Design and Access Statement, Revision 004 —** https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020022-003553-5.5%20Design%20and%20Access%20Statement_Rev004.pdf
3. **AQUIND, Environmental Statement Chapter 20: Surface Water Resources and Flood Risk —** https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020022-000588-6.1.20%20ES%20-%20Vol%201%20-%20Chapter%2020%20Surface%20Water%20Resources%20and%20Flood%20Risk.pdf
4. **Environment Agency, Statement of Common Ground (onshore) —** https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020022-002872-7.5.14%20Statement%20of%20Common%20Ground%20with%20Environment%20Agency%20%28onshore%29%20Deadline%204.pdf

5. **Portsmouth City Council, Statement of Common Ground —** https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020022-003819-7.5.3%20SoCG%20PCC.pdf
6. **AQUIND Consultation Report —** https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020022-001079-5.1%20Consultation%20Report.pdf
7. **North Portsea Coastal Scheme —** https://northportseacoastalscheme.org.uk/
8. **Portsmouth City Council, Coastal Defence Management —** https://www.portsmouth.gov.uk/services/environmental-health/flooding/coastal-defence-management
9. **Portsmouth City Council, Full Council papers (9 December 2025) —** https://portsmouth.moderngov.co.uk/documents/g5849/Public%20reports%20pack%2009th-Dec-2025%2014.00%20Full%20Council.pdf?T=10
10. **Planning Inspectorate, AQUIND Interconnector project documents —** https://infrastructure.planninginspectorate.gov.uk/projects/south-east/aquind-interconnector/?ipcsection=docs
11. **AQUIND project proposals and FAQs —** https://aquindconsultation.co.uk/our-proposals/ ; https://aquindconsultation.co.uk/faqs/

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