

## **Written Representation Summary**

Submission Reference: [REDACTED]

Project: Sea Link DCO Application (EN020026)

Interested Party: Karen McKenzie

Date: 13 November 2025

The following is brief 627 word summary of my written representation, and is to be read in conjunction with the Tracked Changes and or Clean copy, as much detail is obviously missed out.

### **1. Need Case Not Justified**

- The energy market has evolved rapidly, undermining the assumptions behind Sea Link's justification.
- Recent government consultations and Select Committee hearings have questioned National Grid's modelling and cost basis.
- Constraint payments and future generation capacity are poorly evidenced; NESO data suggests up to 70% of proposed projects may never be built.
- Alternatives such as routing via Dover or Dungeness are not adequately considered.
- The cost-benefit analysis lacks transparency and fails to demonstrate value for consumers.

### **2. Site Selection Flawed**

- The chosen site at Minster Marshes is geotechnically unsuitable: unstable clay, high groundwater, and no bedrock found.
- National Grid's own design guidance discourages development on such terrain.
- Evidence suggests site selection was reverse-engineered to justify a pre-chosen location.
- Ground investigations are still ongoing, indicating that cost and engineering feasibility remain uncertain.
- Previous archaeological trenches have left land unusable; heavy machinery from the NEMO project caused compaction and flooding.
- Damage from NEMO (e.g. to riverbanks, hedgerows, and replanting schemes) remains unrepaired, undermining trust in mitigation promises.

### **3. Premature in Light of NESO Strategic Spatial Energy Plan**

- NESO is developing a national modelling tool for energy infrastructure siting.
- Proceeding with Sea Link before NESO guidance risks misalignment with strategic planning and ecological harm.
- The project risks becoming an expensive and environmentally damaging white elephant if not aligned with NESO's spatial framework.

#### **4. Failure to Apply Mitigation Hierarchy for landfall in Kent**

- No genuine avoidance of sensitive sites (SPA, SAC, Ramsar, SSSI, NNR); avoidance was ruled out from the outset.
- Construction threatens internationally protected habitats and species, including turtle doves, and golden plover among others.
- Maps misrepresent or omit key ecological features; some habitats are wrongly labelled or excluded from impact assessments.
- A 300m hedgerow linking the SSSI to the Minster Stream—used for bird ringing and planted for habitat connectivity—is slated for removal.
- Acoustic sensitivity assessments ignore wildlife impacts, focusing solely on human receptors.
- The use of attenuation ponds on marshland is geotechnically questionable and ecologically inappropriate.

#### **5. Inadequate Consultation Process**

- Interested Parties were given only six weeks to review over 400 complex documents, many of which were later superseded.
- Documents are only available online and require high-spec computers to access, excluding many residents.
- Feedback from earlier consultations was ignored; local councils and conservation groups report being sidelined.
- Document referencing is inconsistent and confusing (e.g. APP-319 became APP-030 then AS-057), making public engagement difficult.

#### **6. No Local Benefit**

- Minimal employment (15–20 FTEs) during construction; negligible operational jobs.
- No meaningful economic uplift for Thanet or Sandwich.
- Contravenes the Procurement Act 2023 requirement for local benefit in public spending.
- Thanet is treated as a “Zone of Sacrifice” with no compensatory gain.
- National Grid’s own documents acknowledge that socio-economic benefits are “insignificant” for the local area.

#### **7. Local House Price Blight**

- Properties near Pegwell Bay have lost value and become unsellable.
- Residents were not properly informed during consultations, leading to distress and legal risks.
- Estate agents are now legally obliged to disclose the project, further depressing the market.
- Some residents only learned of the project through grassroots campaigns, not official channels.

## **8. Human Health & Wellbeing**

- Issues are downplayed and ignored throughout.

## **9. Conclusion:**

The Sea Link proposal fails to demonstrate a robust need case, violates site selection best practice, pre-empts strategic planning, and threatens internationally protected environments. It offers no local benefit and imposes significant social, ecological, and economic costs. The consultation process has been exclusionary and opaque. I urge the Planning Inspectorate to reject the current proposal or require substantial revision in line with national policy, environmental protections, and community interests.