

Written Representation from [REDACTED] – Sarah Bailey

Tuesday 18th November 2025

Summary

This document is in addition to my Relevant Representation submitted on 22 June 2025 and my verbal submission to the Open Floor Hearing on 12 November 2025.

In addition to my concerns about the validity of the project as a whole, the siting of it and ecological impact which I know will be covered in depth by a number of other respondents, I want to draw the attention of the Examining Authority (ExA) to a number of other issues:

- failure to comply with PA23 requirements for NSIPs
- inadequate traffic surveys which fail to account for seasonal tourism
- poor socio-economic assessment
- lack of overall timetable aligned with planned impact and mitigation.

I am largely confining my comments to the documentation issued by National Grid (NG), with a few additional remarks about what I heard at the first Issue Specific Hearing and the Open Floor Hearings held in Kent on 11th and 12th November. As the ExA is aware, around 200 updates have been published since the 23rd June deadline. I would like to put on record that it is almost impossible as a member of the public to be able to comment meaningfully when dealing with such a vast, poorly cross referenced and constantly updated number of documents. I have only been able to review a limited number of documents within the available timescale and would ask that the ExA take that into consideration.

1. Procurement Act 2023 (PA23) requirements for NSIPs

- 1.1. PA23 regulations mandate that public benefit, environmental, social and economic value must be considered. While the NPPS may not specifically apply here, the Act places a statutory duty on the ExA to have regard to the NPPS. I can find no evidence of the Applicant adhering to PS23 requirements. I would like the ExA to explain to Interested Parties why any disregarded policies are irrelevant or inappropriate or would be disproportionate to consider.
- 1.2. PA23 also mandates that any public sector contract must no longer be the Most Economically Advantageous Tender (MEAT) but must be Most Advantageous (MAT). While this is not a tender, I would expect the ExA to implement MAT best practice in their project assessment. Where is the Social Value delivery in the Applicant's submission? It should make up 10% of the ExA's assessment. The Applicant must not be allowed to circumvent regulations that apply to other public sector procurement projects.

2. 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport

- 2.1. Traffic surveys carried out in January in both Kent and Suffolk are entirely inadequate in areas which are heavily reliant on summer tourism. I raised this in my RR. The ExA asked NG about the inadequacy of traffic surveys in Suffolk in your letter PD-006 of 5th August but did not ask the same question of the Applicant in Kent. I note that the Applicant has requested that they respond to this point by Deadline 1 which means I am unable to comment further at this point. I would be grateful if the ExA would also ensure that the Applicant provides a robust response to this point in Kent.

3. 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism

- 3.1. In paragraph 10.9.24, the Applicant states: **£1.1 million would likely be within the Economic Study Area**. I would suggest the word 'likely' is doing some very heavy lifting in this paragraph. No apprenticeships or training opportunities have been provided. A mere 20 jobs to local people have been estimated. The project will undoubtedly have a negative impact on tourism, property values and health and wellbeing. The Applicant must provide some evidence to support this assertion.
- 3.2. The Applicant has not assessed the impact of cumulative projects on socio-economics, nor the impact of the project on traffic or tourism at all. I would request that the ExA ask the Applicant to provide an assessment. As per 2.1 above, without adequate baseline traffic surveys, any impact assessment is meaningless. I urge the ExA to ask the Applicant to provide this information.
- 3.3. In paragraph 10.9.46, the Applicant states: **The King Charles III Coastal Path, NCN 15 and The Cantii Way cycle route will be crossed during the construction and operation of the Kent Onshore Scheme by the Trenchless HVDC Cable**

alignment. This crossing will be underground at depth and will not require land take or access to the routes. As a result, there are no anticipated provisions, diversions or closures. This is not true. As outlined in 3.7 below which reproduces paragraph 10.9.76, the Applicant wishes to have permanent access across these routes whenever they deem it necessary.

- 3.4. In paragraph 10.9.63, the Applicant states that: ***The sensitivity of Great Oaks Small School is assessed to be very high, due to its high level of local importance, the absence of alternatives available in the local area and daily usage by families and children with special needs. The proposed works would be undertaken during the school holidays and/or at a time agreed with the school, avoiding any effects on vulnerable users. As a result, no likely significant effect is anticipated.***
- 3.5. The ExA must ask the Applicant to provide a full GANTT chart of their planned works. Are they really suggesting they will only access Jutes Lane during the school holidays? The Applicant has said they will avoid working on the Marshes at some times, avoid working on Sandwich Bay on others and avoid working during school holidays here. This is a nonsense. How will this impact their work plan? The ExA must insist that a full timetable is provided. I suspect these promises are impossible in terms of carrying out their construction within their planned timetable and in any event, they must provide an overall timetable of works which take all these impacts into consideration which as far as I am aware, they have not.
- 3.6. Further, as I said in my RR, this level of disruption to severely affected autistic children will be immense, even if access via Jutes Lane is restricted to school holidays. The change in landscape will be hugely distressing.
- 3.7. In paragraph 10.9.76, the Applicant states: ***Infrequent movements along the existing foreshore access track on Pegwell Road (via the hoverport) may be required to undertake maintenance works within the intertidal zone, however there will not be a permanent presence. Maintenance works are anticipated on an annual basis with a maximum of two work vehicles and a trailed quad bike per visit. Cable and protection repairs are anticipated on an emergency call-out basis and in a worst-case scenario will require excavators, quad bikes and trailers, as well as potentially transport of specialist equipment. Movements along the access route will interact with PRow TR15 and TR33. Site fencing and crossing gates will be installed to separate construction vehicles and PRow users and will remain in place for the full duration of any maintenance works.*** This paragraph omits any reference to the King Charles III footpath, even though it will also be impacted.
- 3.8. In paragraph 10.9.78, the Applicant goes on to discuss the impact that this maintenance will have on the Contra Trail. Omitting any reference to the King Charles III footpath feels like a deliberate oversight. One wonders what else the Applicant has overlooked.
- 3.9. In addition, if the ExA decides to grant the Change 1 request requiring access to the hoverport during construction, this will have a severe impact on all these PRowS and this document must be revised. The Applicant must also carry out a full Environmental

Impact Assessment as well as assess impact on Recreation, Socio-Economics and Tourism, together with Health and Wellbeing.

- 3.10. I referenced the St Augustine's Camino in my RR. This is directly impacted and I'm disappointed that the ExA have not asked the Applicant to explain their mitigation. This is an internationally important pilgrimage route.

4. 6.2.3.11 Health and Wellbeing (updated May 2025)

- 4.1. Since the App-003 update was published, a new Index of Multiple Deprivation has been published on 30th October 2025. Section 11 of this document should be updated and not rely on 2019 figures.
- 4.2. The Applicant states: ***There are no residential properties within the Kent Onshore Scheme Order Limits.*** The two occupiers living in permanent caravans should be considered residents. The Applicant seems not to think of them as residents as they are not landowners.
- 4.3. In their 1st September response to the ExA's letter, the Applicant states: ***Whilst less formal, the Applicant has have(sic) however previously engaged with the occupier of the caravan in plot 3/20 – one of the local engineers has spoken with the occupier.*** This is not true as Emma Tolley's RR and her OFH statement make clear.
- 4.4. **Employment:** Viking Ship Hugin is located approximately 50 m to the north of the proposed permanent monitoring access route of the Kent Onshore Scheme. Impact on employment needs updating if the Applicant is granted permission to use the hoverport as described in their Change 1 request. What financial compensation is the Applicant proposing to businesses which will be ruined by the Applicant's construction?

5. 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment (version B September 2025)

- 5.1. In this document, the Applicant states that for Kent landfall, they require: ***One barge / Jack-up or back-hoe dredger. As a result of spud cans: At each Jack-up location: 50 m2. 4 locations = 200 m2. Area of seabed disturbance from Cable Lay Barge (CLB): 32 m2 (at each anchor worked location). Each anchor 2 m in length and deployed up to 600 m from CLB. Area of seabed disturbance from back-hoe dredger, which maintain position via anchor or spud can: 50 m2 at each exit pit location.*** For the ExA's information, this is a spud can.



- 5.2. And: ***Kent landfall - Temporary Cofferdam dimensions, length: 10 to 15 m, width: 3 to 5 m, depth: 2 m below seabed level, for each of the 4 HDD exit points. Pile dimensions - potentially 9 m piles founded to 6 m depth below ground level.***
- 5.3. In their Community Update of November 2025, the Applicant states that: ***We would install cables approximately 15 metres (equivalent in height to around three and a half double decker buses) beneath the saltmarsh and reserve using trenchless technology. No disturbance would occur to the saltmarsh or the nature reserve, which would remain open for public use during construction and operation.***
- 5.4. There is a clear implication here that they will be tunnelling under the bay and not breaking the surface of it at all which is disingenuous in the extreme. The entirety of Sandwich Bay and Hacklinge Marshes is a nature reserve. Spudcans, a back-hoe dredger and cofferdams will cause immense damage to the nature reserve. The image below is of a cofferdam.



6. 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent

- 6.1. In paragraph 5.5.4, the Applicant states: ***The abnormal vehicles will be required to follow the abnormal vehicle routing strategy (see Application Document 6.4.3.7.3 Abnormal Load Routing Plan).***

- 6.2. There is no document of either that name or number in the Examination Library. I have checked using both name and number. Please see screenshot below. I am concerned that the Applicant has not provided this information. If this information has been subsequently provided by the Applicant, it is not adequately referenced, how many other documents or references are missing from this application?

Search documents

Search by author, description or document type.

6.4.3.7.3 Abnormal Load Routing Plan	Search
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No results were found matching your search term or filters.

Would you like to clear your search and filters to view all available documents instead?

7. Missing information and errata

- 7.1. As far as I am aware, there has been no **carbon footprint** assessment of this project. I urge the ExA to provide one. Carbon sequestration of marshland is estimated to happen 40 times faster than woodland. What is the carbon footprint of the project when taking the loss of marshland, the construction and materials required to construct this? I cannot find any evidence of any calculation.
- 7.2. I am also not aware of any **revised costs not EIA** provided by the applicant to construct a 2-metre-high platform to attempt to 'float' the converter station above the marsh to prevent it from sinking. The ExA should ask for this. The ExA should also ask how the Applicant will prevent the converter station from sinking as testimony at the OFHs made it very clear this is what will happen.
- 7.3. This is as far as I've got in the time I've had available. If I had more time to review the documents, I'm certain I'd find more holes, omissions and contradictions. This is a shoddy and arrogant application wherein the Applicant assumes it can run roughshod over British law and due process. It is evident that despite the ExA's best efforts to impel the Applicant to provide missing information, there are so many holes and inconsistencies that this is impossible for the ExA to find all the flaws and for Interested Parties to review in the mandated timetable for NSIPs.
- 7.4. This is my first time engaging with a DCO process. I am shocked at how the process is absolutely stacked against individuals, how little respect the Applicant has for affected people, and how it is not remotely fair or transparent. I don't blame this ExA for this in any way – we are all operating within the system. But the system is very poor.

8. Comments on Issue Specific Hearing and Kent Open Floor Hearings

- 8.1. As I said at the Open Floor Hearing, I was appalled that the Applicant took no responsibility for the colossal damage caused by the Nemo link which continues to

this day. I would expect a socially responsible business to draw on lessons learned and engage and collaborate with KWT and others to understand the consequences of Nemo to avoid making the same mistakes again. To dismiss this as the responsibility of a 'sister company' is simply not good enough. I have worked in the private sector my whole life and I have never known a plc to behave with such disrespect for due process or local communities. In the Open Floor Hearings we heard from people who had not been told that the Applicant intends to remove trees from their land. The owners of the Viking Ship Café whose business will be destroyed if the ExA grants permission for Change 1 were not aware of the consultation for that until I spoke to them.

- 8.2. Finally, in the Open Floor Hearings, it was made abundantly clear how foolhardy it is to construct a building of this size and weight on marshland. Incidentally, the airman who sunk, along with his Messerschmitt into the marsh was 24 year old Corporal Fritz Buchner who died in August 1940. His body and plane were not recovered until 1984.