

WRITTEN REPRESENTATION

Kent Sea Link Development Consent Order

Submitted by:

Councillor Abi Smith

Thanet District Councillor for the Thanet Villages Ward

Interested Party reference: [REDACTED]

1. Introduction

This written representation supplements my oral submission. The central contention is that National Grid has failed to adequately demonstrate that alternative sites have been exhausted, and that the proposed development would cause irreparable harm to legally protected habitats hosting critically endangered species.

2. Inadequate Assessment of Alternatives

2.1 Cost-Driven Site Selection

National Grid has justified Minster Marshes' selection primarily on cost grounds, claiming it represents 'the cheapest option'. This approach fails to properly weigh environmental considerations. Emma Waller of Kent Wildlife Trust states: 'There appear to be several options for Sea Link, yet the current plans will cause significant disturbance to wildlife at a site with multiple statutory conservation designations that should be protected.'

Sources: Kent Wildlife Trust; The Isle of Thanet News (9 April 2025)

2.2 Questions National Grid Must Answer

Before consent can be granted, National Grid must provide satisfactory answers to:

1. What alternative sites were considered, and what was the full assessment methodology?
2. Were comprehensive ecological field surveys conducted at all potential sites?
3. Has National Grid properly accounted for additional construction costs at Minster Marshes due to unstable, flood-prone ground (40,000 lorry loads of aggregate, extensive concrete works)?
4. Has National Grid calculated the carbon emissions from massive concrete infrastructure required at this site versus alternatives?

Without transparent answers, it cannot be said that alternatives have been exhausted.

2.3 Burden of Proof

Sites with this level of statutory protection should be considered only as a last resort. The Environmental Law Foundation notes: 'This area has been targeted for development in the past, with several planning approvals being granted. This has caused a drastic reduction in the biodiversity of the area, and has made Minster Marshes a haven for wildlife, acting as a critical ecological superhighway.'

That Minster Marshes has become a crucial refuge because surrounding areas have been developed strengthens, not weakens, the case for its protection.

Source: Environmental Law Foundation (30 June 2025)

3. Ecological Significance

3.1 Critically Endangered Species

Kent Wildlife Trust has confirmed the presence of critically endangered European eels (*Anguilla anguilla*), which have declined by 95% since the 1980s. The site also supports 32 red-listed and 46 amber-listed bird species, including nightingales, turtle doves, skylarks, curlews, golden plover, and jacksnipe. Independent bird ringing data shows that in 2023, Minster Marshes accounted for 90% of woodcock, 90% of jacksnipe, and 50% of all skylarks ringed in Kent.

Sources: Kent Wildlife Trust (2025); The Canary (16 March 2025); Environmental Law Foundation

3.2 Protected Designations

The development impacts two SSSIs, two Special Areas of Conservation, a Special Protection Area, a Ramsar Wetland, Kent's largest National Nature Reserve, and a Marine Conservation Zone. Pegwell Bay has more statutory conservation designations than any other bay in the UK. Golden plover and turnstone, designated features of the SPA, have been recorded in significant numbers on the proposed converter site.

Sources: Kent Wildlife Trust; multiple campaign materials

4. Carbon Contradiction

4.1 Construction Requirements

The site lies in a groundwater flood zone with soft clay soil unsuitable for heavy construction. National Grid proposes raising the ground level by two metres using 40,000 lorry loads of aggregate, constructing a concrete platform covering one square kilometre, and installing concrete support columns 20 metres deep. The 28-metre-tall converter station will cover 9 hectares.

Source: The Isle of Thanet News (8 July 2024)

4.2 Concrete Emissions

Concrete production is responsible for 8% of global CO₂ emissions. For every 1,000 kg of Portland cement produced, 931 kg of CO₂ are emitted. Destroying natural carbon sinks (wetlands) to build carbon-intensive infrastructure contradicts stated climate objectives.

Sources: EConcrete (11 December 2022); PMC (2021); Northwestern University (2025)

5. Planning Deficiencies

5.1 Contradictory Impact Assessments

National Grid's documentation contains a fundamental inconsistency: the application states 40,000 lorry loads are required solely for aggregate, yet claims total construction will involve only 38,000 lorry movements. These figures are mathematically incompatible. If National Grid cannot provide consistent basic logistics figures, how can the Examining Authority trust environmental impact assessments?

Sources: The Isle of Thanet News (8 July 2024); CrowdJustice

5.2 Previous Environmental Damage

When National Grid drove the Nemo cable through Pegwell Bay in 2019, it caused permanent damage to the saltmarsh and nature reserve despite assurances of 'limited impact'.

Source: CrowdJustice campaign

6. Required Independent Assessment

Before consent can be granted, an independent expert assessment (not engaged solely by National Grid) must:

5. Identify all potentially viable alternative sites with comprehensive field surveys
6. Calculate full lifecycle carbon footprint of each option
7. Assess true economic costs including environmental remediation and long-term maintenance
8. Apply precautionary principle when sites have this level of statutory protection
9. Conduct genuine engagement with local communities and conservation organisations

Granting consent without this assessment would set a dangerous precedent that cost considerations can override protection of internationally designated conservation sites.

7. Conclusion

This Development Consent Order must be refused on four grounds:

First:

National Grid has not demonstrated that alternative sites have been properly assessed. The reliance on cost considerations and potential desktop studies indicates incomplete alternatives assessment.

Second:

The project threatens critically endangered species (European eels with 95% decline), 32 red-listed and 46 amber-listed bird species, and sites with more statutory protections than any other UK bay.

Third:

Destroying natural carbon sinks combined with massive concrete construction emissions (40,000 lorry loads, 1sqkm concrete platform) undermines climate objectives.

Fourth:

Internal inconsistencies (contradictory lorry figures) and documented history of environmental damage undermine confidence in impact assessments.

Recommendations:

1. The Examining Authority should refuse this Development Consent Order
2. National Grid must conduct a comprehensive, transparent review of alternative sites
3. Independent experts must assess all alternatives with full field surveys and carbon assessments
4. Only after these conditions are met should further consideration of consent be entertained

The burden of proof lies with the applicant to demonstrate no viable alternative exists. National Grid has not met this burden.

Respectfully submitted,

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District Councillor, Thanet Villages Ward

8. Key Sources

- Kent Wildlife Trust, multiple publications (2025)
- Environmental Law Foundation (30 June 2025)
- The Isle of Thanet News (8 July 2024; 9 April 2025)
- The Canary (16 March 2025)
- Kent Online (28 March 2025)
- EConcrete (11 December 2022); PMC (2021); Northwestern University (2025)
- CrowdJustice campaign; Save Minster Marshes (www.minstermarshes.com)