Submission ID: SB430B897

Deadline 2 Submission – Comments on Written Representations, Local Impact Reports, Applicant Responses, and New Information
Submitted by: Joanna Styles (Interested Party – Kent) Date: 9 December 2025
Please find Introduction here and my full submission in the attached PDF.
0. INTRODUCTION
This Deadline 2 submission provides:
1. Comments on Written Representations (WRs)
2. Comments on Further Information Submitted at Deadlines 1 and 1A, including:
o The Change Application
o Saltmarsh Technical Note
o Seal/airborne noise modelling
o New ES appendices for Kent (noise, ecology, construction method, suspended sediment modelling, marine mammals, REAC v2)
3. Comments on Applicant's Responses to Relevant Representations (RRs)
4. Comments on Local Impact Reports (LIRs) – Thanet DC, Kent CC, Dover DC
5. Identification of outstanding concerns and evidence gaps
6. Requests to the Examining Authority (ExA)
This submission covers Kent only.
It cross-references my initial Relevant Representation, updates based on all new material, and highlights new issues emerging from the Applicant's own Deadline 1 and 1A documents.

Sea Link – EN020026

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PART 0 INTRODUCTION

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PART 1 EXECUTIVE SUMMARY & STRATEGIC FRAMING

1.1 EXECUTIVE SUMMARY – KEY ISSUES FOR KENT (UPDATED FOR DEADLINE 2)

Across all new documentation since Acceptance and since my Relevant Representation, the following remain unresolved:

1.1.1 The Change Request is Not "Minor" in Kent

The Applicant continues to assert "no new significant effects", yet the change request:

- expands the Pegwell Bay Order Limits to include the entire saltmarsh, not avoided as originally presented;
- introduces new compulsory acquisition powers;
- adds new access corridors along the hoverport frontage;
- requires new modelling, new surveys, and new assessments — all still incomplete.

These features are prima facie material, not administrative refinements.

1.1.2 Kent's Evidence Base Is Still Being Constructed During Examination

New Deadline 1 documents confirm that:

- updated ecological baseline,
- updated sediment modelling,
- marine mammal airborne sound modelling,
- seal surveys,
- HDD feasibility clarifications,
- noise appendices, and
- construction access details,

were not available at application.

This makes the application premature, and consultation not meaningful, because the public and regulators were asked to respond before key information existed.

1.1.3 Consultation in Kent Remains Inadequate and Misleading

New documents, including the Applicant's RR response, reinforce systemic weaknesses:

- No meaningful alternatives presented for Kent
- Hoverport area treated as "countryside", excluding neighbouring residents from consultation radius
- Visualisations taken from rural long-distance viewpoints, not from the homes facing the 28-metre converter building
- Two 8-week consultations do not constitute "years of rigorous consultation"
- A mailing to 35,000 households across two counties is not representative when most critical constraints were undisclosed.

PART 1 EXECUTIVE SUMMARY & STRATEGIC FRAMING

1.1.4 Pegwell Bay Remains One of Kent's Most Sensitive Environments

New evidence confirms:

- 365-day CROW s26 closure for bird protection
- Very large population of grey + harbour seals in the Thanet–Pegwell system
- SPA and Ramsar designations
- Highly sensitive intertidal mudflat ecology
- Recreational and walkway value of hoverport frontage
- Saltmarsh is expanding landward, yet Applicant proposes flexible Order Limits instead of a defined alignment.

The Applicant's materials repeatedly rely on future surveys and future modelling, not evidence now.

1.1.5 HDD Feasibility Uncertain

From the 7.3 report:

- HDD exit locations remain conceptual
- Risk of frac-out not evaluated for Pegwell sub-strata
- No geotechnical data for saltmarsh substrate
- Apparent conflict between drill radius and protected zones

This reinforces that the Kent scheme is still in design development, not "exam-ready".

1.1.6 Noise and Construction Disturbance Severely Underestimated

Based on ES Ch 9, Appendices 3.9.A–D:

- Only one noise monitoring location used for the entire Minster converter–substation cluster
- Baseline is rural, but construction is industrial-scale
- Construction peaks appear understated
- No assessment of cumulative noise from co-located converter + substation + overhead line landing
- No marine noise assessment for airborne construction noise on seals until Deadline 1

1.1.7 REAC v2 Does Not Secure Actual Mitigation

Much is "embedded" or "good practice", but not enforceable.

Commitments rely heavily on "contractor will", "where practicable", "as far as possible", etc.

This is not sufficient where Kent's receptors include SPA/Ramsar habitats and a nationally important seal population.

PART 1 EXECUTIVE SUMMARY & STRATEGIC FRAMING

1.2. COMMENTS ON FURTHER INFORMATION SUBMITTED AT DEADLINES 1 AND 1A

This section (Part 2) will include deep dives into:

- Saltmarsh Technical Note (serious methodological concerns)
- Airborne seal disturbance modelling (marine mammal note)
- HDD feasibility and 7.3 design report
- Noise & Vibration evidence base (Ch 9 + Appendices)
- Traffic & Transport
- Marine ecology & ornithology (Ch 5)
- Sediment modelling (Appendix 4.1.A)
- Construction method (9.13 Pegwell Bay note)
- REAC v2 shortcomings

1.3. COMMENTS ON APPLICANT'S DETAILED RESPONSE TO RELEVANT REPRESENTATIONS (Document 9.34.1)

This is a c500-page attempt to rebut stakeholder concerns, but several patterns emerge:

1.3.1 Pattern of Tone Over Evidence

For many issues raised (including mine, KWT's, SEAS', and local residents'), the Applicant responds with:

- statements of confidence
- suggestions that concerns are "misunderstandings"
- repeated reliance on "accepted by Section 55"
- heavy procedural framing

What they do **not** provide:

- quantifiable evidence
- updated modelling
- transparent option comparison
- rationale for land take
- explanation of design evolution in Kent

1.3.2 Misrepresentation of Consultation Adequacy

The Applicant repeatedly states:

- "We complied with Section 47."
- "The LPA adequacy responses raised no issues."

Both statements are legally irrelevant to the *quality* of consultation.
The ExA must determine adequacy, and the updated 2024 guidance imposes obligations the Applicant did not meet.

PART 1 EXECUTIVE SUMMARY & STRATEGIC FRAMING

1.3.3 Failure to Address My Specific RR Points

I will produce a cross-reference table (in Part 3) showing:

- which of my RR issues are unaddressed,
- which the Applicant deflects, and
- which they delay to future surveys / plans.

1.4. COMMENTARY ON LOCAL IMPACT REPORTS (KENT) (Thanet DC; Kent CC; Dover DC)

1.4.1 Alignment and Support

Across all three LIRs, there is strong alignment with issues I identify:

- Concerns about scale and massing at Minster converter station
- Risks to ecology, saltmarsh, birds, and seals
- Inadequate construction traffic assessment (Appendices 3.7.A–J show serious gaps)
- Inadequate consultation
- Uncertain HDD feasibility
- Insufficient landscape mitigation for immediate residents near the hoverport and the converter station
- Significant recreational impact on the hoverport frontage

The LIRs reinforce that the Applicant **downplays impact** at every stage.

1.4.2 Key Points Strengthened by LIRs

a) Visual and landscape harm

Kent CC and Thanet DC both identify that:

- Converter station height and scale are far beyond what the Applicant visually models.
- Landscape buffers inadequate for the urban–rural interface.
- Night lighting impacts understated.

b) Biodiversity and marine mammals

All councils raise unresolved issues regarding:

- noise disturbance
- seal haul-out disruption
- bird disturbance in a legally restricted intertidal zone
- insufficient avoidance, reliance on mitigation “later”

c) Transport

Appendix 3.7 shows:

- baseline flows outdated

PART 1 EXECUTIVE SUMMARY & STRATEGIC FRAMING

- no seasonal peak analysis
- hoverport access modelling poor
- cumulative traffic not considered
- Saturday peaks ignored

Councils confirm that highway risk is not adequately assessed.

PART 2 COMMENTS ON FURTHER INFORMATION SUBMITTED AT DEADLINES 1 AND 1A

2.1 PEGWELL BAY SALTMARSH — TECHNICAL AND EVIDENCE ANALYSIS

2.1.1 Core Concern

The Applicant continues to assert that Change 1 remains "non-material" and environmentally neutral.
The evidence now supplied at Deadline 1 contradicts that claim.

2.1.2 Internal contradictions in the Saltmarsh Technical Note

From the new *Saltmarsh Technical Note*:

- Applicant admits *the revised Order Limits include the entire existing saltmarsh*.
- Applicant claims this is "not an indication" of proposed works but merely "flexibility".
- Applicant acknowledges that *saltmarsh is likely to migrate* over the coming years.
- Applicant has not provided any limit to how far that "flexibility" might extend in practice.

This creates the following problems:

(A) "Flexibility" without boundary = unassessed impact

The Note does not set:

- a maximum spatial envelope for saltmarsh shift
- a binding condition preventing construction on saltmarsh
- any enforceable requirement in the REAC or DCO

Therefore, the technical note allows construction within an area explicitly recognised as ecologically critical.

(B) The modelling is NOT of the change-area itself

The technical note models *sediment dynamics* and *saltmarsh erosion*, but does not model:

- the consequences of tracking heavy plant within the change area
- ground disturbance and compaction risks
- localised hydrological changes caused by widened access

These omissions substantially weaken the credibility of their "no significant effect" conclusion.

(C) The Applicant treats "erosion" as an external factor

They argue the saltmarsh is *already eroding*, implying their works pose no meaningful additional effect.

PART 2 COMMENTS ON FURTHER INFORMATION SUBMITTED AT DEADLINES 1 AND 1A

But the technical note silently assumes:

- *no construction-induced acceleration* of erosion
- *no disturbance-induced habitat fragmentation*

These assumptions are not justified by the evidence.

The baseline is dynamic and vulnerable, so any disturbance can have disproportionate long-term effects.

(D) No cumulative assessment

The technical note fails to account for:

- Lidar-mapped sediment shifts
- Increased footfall and disturbance from the proposed new access route
- Disturbance to seal haul-out sites (see Section 2.2)

This breaches the requirements of:

- NPS EN-1 (cumulative impact duty)
- Habitats Regulations (requirement for "in-combination" review)

2.2 SEALS & AIRBORNE SOUND — ANALYSIS OF TECHNICAL NOTE 9.49

The Applicant's new modelling is presented as an "improvement", but several weaknesses undermine the conclusions.

2.2.1 Auditory Injury Modelling Issues

1. The Applicant calculates only TTS/PTS thresholds from airborne noise, not behavioural disturbance.
   Behavioural disturbance — *including abandonment of haul-outs* — occurs at far lower levels, and is the primary route by which seals are affected.

2. The model uses M-weighting, which is correct, but the underlying source data remain unchanged from the earlier A-weighted modelling — meaning source uncertainty is not addressed.

3. Reflective surfaces (water, intertidal flats) are treated as "hard" surfaces but no sensitivity analysis is given.
   Reflection *increases* effective sound exposure — but this is not explored.

4. The Applicant models only continuous 12-hour use of a vibratory rig + excavators, but does not include:

    - emergency hovercraft deployment
    - unplanned plant movement

- overlapping construction phases

These represent credible worst-case scenarios which are excluded.

2.2.2 Behavioural Disturbance is Not Modelled

Natural England's published advice is clear:

Disturbance to pinnipeds can occur at levels significantly below those causing auditory injury.

Yet the Applicant:

- does not model behavioural thresholds,
- does not quantify changes in haul-out behaviour,
- and fails to consider disturbance to dependent pups.

This is scientifically incomplete and materially undermines their "no significant effect" claim.

2.2.3 Population-Level Impact Ignored

Pegwell/Stour supports ~3,600 seals (harbour + grey).
This is a nationally significant population.

Population-level effects *are not addressed* in any of the following:

- Marine Mammals Chapter
- Seal Technical Note
- REAC commitments

This is a HRA failure.

2.3 HDD FEASIBILITY (Document 7.3) — FLAWED AND INCOMPLETE

Major concerns:

2.3.1 No geotechnical justification for the 1.2 km HDD length

The document:

- lacks detailed borehole logs for the full HDD alignment
- uses generic soil assumptions
- does not model the effect of saltwater-saturated substrates near the exit pits

HDD failure rates increase in:

- saturated silts
- unconsolidated sediment
- mixed strata

All three are present at Pegwell.

PART 2 COMMENTS ON FURTHER INFORMATION SUBMITTED AT DEADLINES 1 AND 1A

2.3.2 No contingency plan for HDD breakout

The Applicant explicitly states:

“Breakout risk is low”.

This contradicts:

- EA advice
- NE advice
- Kent Wildlife Trust evidence
- Case history of HDD failures in similar geologies

No plan is secured in the DCO for:

- frac-out response
- grab recovery
- re-drilling
- bentonite release management

This omission is serious.

2.3.3 HDD exit pit location is STILL not fixed

Despite the change request stating increased precision, the HDD exit remains:

- within a broad “Limits of Deviation”
- not shown on a fixed construction plan
- not tied to a specific coordinate in the DCO

This means the Applicant can:

- encroach further into the saltmarsh,
- shift access routes,
- alter construction heights,
- relocate plant zones.

This undermines the credibility of all assessments.

2.4 NOISE & VIBRATION — KENT CHAPTER 9 ANALYSIS

2.4.1 Baseline data reliability

The Kent Noise Survey Data shows:

- insufficient night-time sampling
- gaps in readings near Nethercourt and Cliffsend
- no assessment of aircraft noise influence (Manston)

PART 2 COMMENTS ON FURTHER INFORMATION SUBMITTED AT DEADLINES 1 AND 1A

This leads to errors in:

- receptor categorisation
- significance thresholds
- cumulative judgements

2.4.2 Predicted construction noise is understated

Multiple problems:

- Using average LAeq rather than peak levels masks worst-case conditions
- No modelling of plant movements across reflective mudflats
- No account of high amplitude impulsive noise from anchor installation

2.4.3 Traffic noise assessment excludes hoverport-edge homes

Houses directly facing the converter station site are not modelled as receptors in the traffic noise assessment.

Applicant has classed the hoverport as “countryside” → therefore claims no sensitive receptors present.

This is demonstrably incorrect.

2.5 TRAFFIC & TRANSPORT (Appendices 3.7.A–J)

2.5.1 Receptor classification errors

The Transport Assessment:

- excludes Cliffsend: mislabelled as “not significantly affected”
- excludes the hoverport-area residents entirely
- excludes recreational users of the Pegwell Bay frontage

This leads to an artificially low impact classification.

2.5.2 Trip generation not credible

The Saturday trip-generation tables (3.7.F) assume:

- unusually low contractor car ratios
- no HGV overlap
- no plant recovery movements
- no peak contingency traffic

This is not a realistic worst-case scenario.

PART 2 COMMENTS ON FURTHER INFORMATION SUBMITTED AT DEADLINES 1 AND 1A

2.5.3 Highway Impact Assessment (3.7.H) uses outdated counts

Counts are:

- 2019 pre-Manston reopening
- 2020 COVID-affected
- not updated despite new local development
- not validated against ANPR data

This breaches DfT guidance.

2.6 ECOLOGY & ORNITHOLOGY (Part 3 Kent Chapter 2 + Marine Ornithology Chapter)

2.6.1 Incomplete baseline

The Applicant admits:

- wintering bird survey gaps
- absence of full SPA-functionality mapping
- lack of night-time behavioural data
- incomplete seal pup monitoring

This makes significance conclusions unsafe.

2.6.2 REAC commitments are non-specific

Many Kent ecology mitigations say:

“Where practicable.”
“As far as possible.”
“Subject to contractor method.”
“Indicative location.”

This does not satisfy the legal requirement for secured mitigation under the Habitats Regulations.

2.6.3 Marine ornithology fails to model displacement

The Marine Ornithology chapter:

- does not model displacement of golden plover
- does not include migratory wader disturbance
- assumes SPA birds will habituate

NE guidance states habituation *cannot be assumed*.

PART 2 COMMENTS ON FURTHER INFORMATION SUBMITTED AT DEADLINES 1 AND 1A

2.7 REAC ANALYSIS — SECURING FAILURES

2.7.1 REAC measures are not enforceable

The Kent REAC table:

- does not secure HDD parameters
- does not secure saltmarsh protection
- does not secure behavioural thresholds for seals
- does not secure maximum noise levels
- does not secure precise access routes
- does not secure haul-out exclusion zones

2.7.2 Many key Kent impacts rely on “contractor discretion”

This is not acceptable for a DCO.

Key wording problems:

- “appropriate”
- “where practicable”
- “subject to agreement”
- “anticipated”
- “expected”

None of these bind the Applicant.

PART 3 COMMENTS ON APPLICANT'S RESPONSES TO RELEVANT REPRESENTATIONS

3. Cross-referencing of Joanna Styles' Relevant Representation (RR) with Applicant's Responses

Issue Raised in My RR (18 Aug 2025)	Applicant's Response (from 9.34.1 and follow-on submissions)	Outstanding Concerns / What the Applicant Has *Not* Resolved
1. Inadequate consultation; lack of meaningful public engagement; exclusion of Pegwell Bay residents; no alternatives disclosed.	Applicant states consultation complied with Section 47; Section 55 acceptance proves adequacy; LPA AoC responses raised no failures; mailing to 35,000 households considered adequate.	**Fails to address substance**: • Section 55 is a threshold, not a test of quality. • 35,000 over two counties ≠ meaningful engagement. • No evidence of engagement with hoverport-adjacent residents. • No disclosure of saltmarsh constraints, HDD feasibility limits, or seal haul-out locations at the time of consultation. • Change request itself demonstrates gaps in early evidence. **Still unresolved**: • Documentation shows *internal technical optioning*, not public-facing alternatives assessment. • No evidence of presenting Kent alternatives to public. • No explanation why the hoverport frontage — a recreation area and ecologically sensitive — was chosen over sites with demonstrably lower environmental conflict.
2. Kent site selection appears predetermined; alternatives not transparently assessed.	Applicant references APP-368 and APP-301 routeing/siting methodology and constraints mapping.	

PART 3 COMMENTS ON APPLICANT'S RESPONSES TO RELEVANT REPRESENTATIONS

Issue Raised in My RR (18 Aug 2025)	Applicant's Response (from 9.34.1 and follow-on submissions)	Outstanding Concerns / What the Applicant Has *Not* Resolved
3. Pegwell Bay ecological sensitivity (SPA/Ramsar, golden plover, saltmarsh, seal populations).	Applicant states effects are "not significant", "design will avoid saltmarsh", impacts mitigated through timing restrictions and CEMP measures.	**Contradictions remain**: • Revised Order Limits include all current saltmarsh (Rule 9 confirmation). • HDD feasibility is unproven; thermoplastic drilling fluids interactions not evaluated; risk pathways insufficiently assessed. • Seal disturbance analysis uses optimistic assumptions; updated M-weight model still shows significant unassessed behavioural disturbance.
4. Change Request is major, not minor — late surfacing creates procedural unfairness.	Applicant asserts change is "not substantial", will not delay Examination, no new significant effects, CA Regulations triggered but manageable.	**Unresolved**: • CA powers = major material change. • Rule 9 letter shows ExA disagrees with Applicant's minimisation. • Late surfacing restricts ability of public to engage compared with Applicant's specialist team.
5. Construction impacts in Kent underestimated (noise, traffic, access, HDD risks).	Applicant relies on embedded mitigation; states assessments follow best practice; effects "not significant"; REAC commitments control risks.	**Still unproven**: • Noise baseline taken from one rural monitoring point (K_L1), not representing marine, intertidal or settlement receptors. • Traffic study based on unvalidated assumptions (worker distribution, abnormal loads).

PART 3 COMMENTS ON APPLICANT'S RESPONSES TO RELEVANT REPRESENTATIONS

Issue Raised in My RR (18 Aug 2025)	Applicant's Response (from 9.34.1 and follow-on submissions)	Outstanding Concerns / What the Applicant Has *Not* Resolved
		• HDD exit pit modelling omits failure scenarios, breakout risks, turbidity plumes.
6. Incomplete evidence at application stage; application submitted prematurely.	Applicant insists evidence was "sufficient" for acceptance; further detail to be provided during Examination.	**Major outstanding concern**: • ExA has had to issue repeated Rule 17 requests due to missing/ inconsistent information. • Saltmarsh Technical Note, seal modelling, sediment modelling, access design, HDD construction method all provided after submission. • This is consent by mitigation, not by assessment.
7. Impact on recreation and amenity at hoverport frontage.	Applicant acknowledges area used for walking; states impacts temporary and mitigated.	**Still unresolved**: • Loss of access to entire frontage for extended periods. • No photomontages or visualisations from dwellings immediately opposite converter station. • Construction compound footprint significantly larger than shown in early consultation materials.
8. Visual, noise and landscape impacts of 28m building on nearby homes.	Applicant uses distant viewpoints; insists receptors are limited due to "countryside" classification.	**Critical gap**: • Homes directly facing site not assessed. • Viewpoints selected from rural distances, not actual residential vantage points. • Applicant treating hoverport area as "countryside" = exclusion of real receptors.

PART 3 COMMENTS ON APPLICANT'S RESPONSES TO RELEVANT REPRESENTATIONS

Issue Raised in My RR (18 Aug 2025)	**Applicant's Response (from 9.34.1 and follow-on submissions)**	**Outstanding Concerns / What the Applicant Has *Not* Resolved**
9. Failure to consider cumulative effects with other NSIPs in Kent.	Applicant notes cumulative assessments included in ES.	**Insufficient**: • Narrow definition of cumulative zone excludes foreseeable grid reinforcements + Richborough corridor constraints. • Recreational displacement effects not assessed.
10. Applicant's tone + dismissive response to stakeholders (KWT, SEAS, residents).	Applicant states all RRs have been "taken on board" and will be addressed in Deadline 1 response.	**Not resolved**: • Responses remain argumentative, not evidence-led. • Applicant repeatedly downplays errors as "standard" and concerns as "misunderstandings".

PART 4 CONSOLIDATED CONCLUSIONS

4. Consolidated Conclusions

1. Kent has been procedurally disadvantaged by:
    - late surfacing of the Change Request,
    - incomplete baseline evidence at application,
    - premature submission that required extensive post-application corrections.
2. Change 1 at Pegwell Bay is material, not minor, because it:
    - triggers new CA powers,
    - expands Order Limits dramatically,
    - affects SPA/Ramsar features,
    - impacts a nationally important seal population,
    - removes access to a major recreational area.
3. The Applicant's updated evidence does not resolve foundational concerns:
    - HDD feasibility unproven, risks unassessed.
    - Seal disturbance analysis still uses highly optimistic, behaviour-blind assumptions.
    - Sediment modelling does not address worst-case plume or HDD breakout.
    - Noise baseline and visual assessments omit nearest actual receptors.
    - Traffic and access assessments contain unsupported assumptions.
4. Consultation was not meaningful:
    - limited to procedural compliance rather than iterative engagement,
    - alternatives not disclosed,
    - hoverport residents excluded,
    - information incomplete at all key public stages.
5. Applicant continues to minimise or reframe concerns, rather than address them on their merits.

PART 5 FORMAL REQUESTS TO THE EXAMINING AUTHORITY

5.1 On the Change Request

- Determine that Change 1 is material, not minor.
- Require full environmental reassessment for:
    - saltmarsh disturbance,
    - seal disturbance (behavioural + energetic),
    - HDD feasibility and breakout risk,
    - recreational loss,
    - noise and visual effects on the immediate residential frontage.

5.2 On Evidence Gaps

Require the Applicant to provide before ISH2:

1. HDD structural/ geotechnical feasibility study including failure scenarios.
2. Full saltmarsh migration model + justification for including entire saltmarsh in Order Limits.
3. Revised seal disturbance assessment incorporating:
    - behavioural metrics,
    - displacement duration,
    - energetic cost.
4. Photomontages from dwellings facing hoverport frontage.
5. Updated construction traffic model using real-world receptor data.

5.3 On Consultation Adequacy

Request the ExA to:

- scrutinise consultation under 2024 guidance (alternatives/transparency),
- require Applicant to demonstrate meaningful engagement with hoverport residents,
- provide clarity on why Kent site was chosen when less harmful alternatives existed.

5.4 On Management, Mitigation and Conditions

If consent is considered:

- Require restrictions prohibiting placement of HDD compounds or temporary works within 50m of CROW-restricted intertidal zones without further assessment.
- Impose strict noise limits based on residential receptors, not K_L1 only.
- Require seasonal seal protection buffer based on updated behavioural modelling.

PART 5 FORMAL REQUESTS TO THE EXAMINING AUTHORITY

5.5 On Examination Fairness

- Request additional time between future deadlines if Applicant continues to submit late evidence.

- Ensure equal treatment of Kent issues alongside Suffolk issues, including dedicated ISHs on Kent ecology, Kent construction methods and Kent traffic.

Thank you

MRS JOANNA STYLES