

Submission to the Planning Inspectorate

Sea Link Project DCO

1. Introduction

We submit this Written Representation in respect of the Sea Link Project DCO, with specific reference to the proposed converter station and associated infrastructure at Minster Marshes. We acknowledge the urgent need for reinforcement of the transmission network but contend that the Applicant has failed to select the least-damaging option consistent with EN-1 and EN-5, and has inadequately assessed alternatives, environmental impacts, and technology options.

Our representation identifies four primary grounds of objection:

1. Flaws in the Habitats Regulations Assessment (HRA).
2. Failure to properly assess the Richborough brownfield alternative.
3. Suboptimal technology choice, contrary to Best Practicable Environmental Option principles under EN-5.
4. Failure to address public value and Green Book obligations.

We respectfully request that the Examining Authority issue targeted Rule 17 questions and convene Issue Specific Hearings (ISHs) on HRA, alternatives, and technology selection.

2. Policy Framework

- **EN-1 (Overarching NPS for Energy)** requires decision-makers to "seek opportunities to avoid and minimise adverse impacts" (§4.2.8).
 - **EN-5 (Electricity Networks Infrastructure)** requires that early-stage network planning balances cost, timely delivery, and minimisation of community and environmental impacts (§1.1.8).
 - Revised **EN-1 and EN-5** came into force on 17 January 2024.
 - The **Habitats Regulations 2017** (as amended) impose strict obligations at the screening, Appropriate Assessment (AA), and Imperative Reasons of Overriding Public Interest (IROPI) stages.
 - The **Green Book (2020)** requires holistic, public value-based appraisal using the Five Case Model.
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3. Habitats Regulations Assessment (HRA)

The Applicant's HRA is inadequate and does not satisfy the precautionary principle.

3.1 European Sites at Risk

- **Thanet Coast and Sandwich Bay SPA:** supports important wintering populations including turnstone, sanderling, and dark-bellied brent goose (JNCC citation).
- **Thanet Coast SAC:** designated for sandbanks, reefs, and marine habitats.
- **Pegwell Bay Ramsar site and NNR:** nationally and internationally important for birds, intertidal habitats, and saltmarsh.

3.2 Impact Pathways

- Noise, artificial light, and construction disturbance.
- Visual intrusion and fragmentation of dark-sky conditions.
- Recreational pressure and construction traffic.

3.3 Survey Gaps

- The Applicant's ornithological surveys did not cover the full overwintering season (Nov–Mar).
- Lighting assessment did not benchmark against ILP GN08 or CIE standards.

3.4 In-Combination Effects

The HRA does not adequately assess cumulative effects with:

- Manston Airport (reinstatement).
- Port of Ramsgate operations.
- Pegwell Hoverport expansion.
- Local development plans.

Request: The ExA should require updated HRA with in-combination analysis and evidence-based precautionary measures.

4. Alternatives Assessment – Richborough Brownfield Option

The Applicant dismissed Richborough without sufficient justification. Richborough offers:

- **Brownfield credentials:** former power station site with grid infrastructure.
- **Industrial setting:** avoids new encroachment into sensitive marshland.
- **Proximity to grid assets:** existing 400kV substation and SF₆-free pilot.
- **Reduced biodiversity risk:** compared with Minster Marshes and its adjacency to SPA/SAC/NNR.

By contrast, Minster requires extensive new infrastructure, reliance on constrained hoverport land, and incurs severe ecological risk.

Request: The ExA should require a side-by-side alternatives matrix (Minster vs. Richborough).

5. Technology Choice – Converter Station Design

The Applicant proposes a standard, bulky converter design. Modern, compact alternatives exist:

- **Hitachi HVDC Light®** and **Siemens HVDC PLUS®**: compact VSC converters with reduced footprint and height.
- **Operational deployments**: Amprion/Hitachi contract (Germany, 2024) demonstrates industry-standard scale.
- **Multi-vendor interoperability**: demonstrated in UK Project Aquila and HVDC Centre trials.

The Applicant has not evidenced why these options were excluded. In addition, NGET has publicly committed to eliminate SF₆ by 2050 and halve emissions by 2030. Indoor, compact GIS/VSC options would better align with this obligation.

Request: The ExA should require the Applicant to provide:

- Side-by-side technology comparison (standard vs. compact VSC).
- Justification for exclusion of BAT options.
- GIS shapefiles showing converter station footprint and construction compounds.

6. Value for Money (VfM) and Public Value

The Applicant presents only a private CAPEX-based case. The **Green Book (2020)** requires a Five Case Model including social and environmental value. Richborough likely delivers superior public value when biodiversity, tourism, community wellbeing, offsetting costs, and litigation risk are included.

Request: The ExA should direct the Applicant to prepare a Green Book–compliant VfM comparison of Minster vs. Richborough.

7. Alternatives Matrix (Minster vs. Richborough)

Criteria	Minster Marshes	Richborough
Land type	Greenfield, sensitive marsh adjacent to SPA/SAC	Brownfield, former power station site
Proximity to designations	Direct adjacency to SPA, SAC, Ramsar, NNR	Away from sensitive sites, within industrial corridor
Flood risk	High – marshland	Managed flood defences, industrial setting

Infrastructure	Requires new compounds, hoverport reliance	Existing 400kV substation, industrial access
Biodiversity risk	Severe (wintering birds, intertidal habitats)	Lower (already industrialised site)
Visual/landscape	Converter station ~28m height in open marsh	Screened within industrial landscape
Programme risk	Land access constraints (hoverport)	Established access corridors
Cost	Likely lower CAPEX but higher ecological/social cost	Higher CAPEX but lower long-term risk/cost
Public value	Net loss of biodiversity and amenity	Potential net gain through regeneration

8. Formal Requests to the Examining Authority

We respectfully request that the ExA:

1. Issue Rule 17 questions requiring the Applicant to:
 - Provide GIS shapefiles of Order Limits and construction compounds.
 - Provide a side-by-side site selection comparison (Minster vs. Richborough).
 - Provide technology comparison (standard vs. compact VSC).
 - Provide updated HRA including full in-combination analysis.
 - Provide Green Book-compliant VfM comparison.
 2. Convene Issue Specific Hearings on:
 - Habitats Regulations Assessment.
 - Alternatives and brownfield options.
 - Converter station technology selection.
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9. Conclusion

The Applicant has not demonstrated compliance with EN-1/EN-5 obligations to minimise impacts, nor with the Habitats Regulations, nor with public value appraisal standards. A brownfield Richborough option, combined with modern converter technology, would better deliver the urgent grid need while safeguarding internationally important habitats and securing value for money.

Accordingly, we urge the Examining Authority to seek full clarification on these points before determining whether the proposed Minster Marshes site is acceptable.

Appendix A – References with Descriptions

1. **EN-1 (2023, revised)** – Overarching NPS for Energy. UK Gov. Establishes the policy framework for energy infrastructure, including the need case and impact

- minimisation. Source:
<https://assets.publishing.service.gov.uk/media/65bbfdbc709fe1000f637052/overarching-nps-for-energy-en1.pdf>
2. **EN-5 (2023, revised)** – Electricity Networks Infrastructure. UK Gov. Provides guidance specific to grid infrastructure, balancing cost, delivery, and community/environmental impacts. Source:
<https://www.gov.uk/government/publications/national-policy-statement-for-electricity-networks-infrastructure-en-5>
 3. **Habitats Regulations 2017 (as amended)** – Statutory instrument governing protection of European sites in the UK. Source:
<https://www.legislation.gov.uk/ukSI/2017/1012/contents>
 4. **Green Book (2020)** – HM Treasury appraisal/evaluation manual. Sets out the Five Case Model for assessing public value. Source:
<https://www.gov.uk/government/collections/the-green-book-and-accompanying-guidance-and-documents>
 5. **JNCC SPA citation** – Thanet Coast & Sandwich Bay SPA. Provides details of protected bird species and features. Source: <https://jncc.gov.uk/jncc-assets/SPA-N2K/UK9012071.pdf>
 6. **Natural England citations** – Thanet Coast SAC and Pegwell Bay NNR. Provide conservation objectives for habitats and species. Source:
<https://publications.naturalengland.org.uk>
 7. **Isle of Thanet News (2025)** – Articles reporting on Pegwell Hoverport land use, hearings, and project constraints. Source: <https://theisleofthanetnews.com>
 8. **Hitachi Energy HVDC Light®** – Product documentation highlighting compact VSC converter technology. Source: <https://www.hitachienergy.com>
 9. **Siemens Energy HVDC PLUS®** – Product documentation describing compact HVDC converter technology. Source: <https://www.siemens-energy.com>
 10. **HVDC Centre / Project Aquila** – Industry demonstration of multi-vendor interoperability. Source: <https://www.hvdccentre.com>
 11. **Amprion/Hitachi Energy contract (Germany, 2024)** – Industry press release showing operational deployment of large-scale compact VSC technology. Source: <https://www.reuters.com/business/energy/amprion-hitachi-energy-sign-over-2-blnc-contract-german-converter-stations-2024-12-20>

Appendix B – Glossary with Narratives

- **AA (Appropriate Assessment):** A legal test under the Habitats Regulations requiring assessment of likely significant effects on European sites and possible mitigation.
- **BAT (Best Available Techniques):** Concept of using the most effective and advanced technology options that are reasonably available to minimise environmental impacts.
- **CAPEX (Capital Expenditure):** Upfront investment cost of building infrastructure; does not capture wider social or environmental impacts.
- **DCO (Development Consent Order):** The planning mechanism under the Planning Act 2008 for approving nationally significant infrastructure projects.

- **EN-1 / EN-5:** National Policy Statements providing the policy and need case for energy infrastructure (EN-1 general, EN-5 electricity networks).
- **ExA (Examining Authority):** Panel appointed by the Planning Inspectorate to examine DCO applications and recommend to the Secretary of State.
- **GIS (Geographic Information System):** Mapping and spatial analysis tools; in DCOs, shapefiles are required for precise project boundary assessment.
- **Green Book:** HM Treasury framework for assessing costs, benefits, and public value of government projects using the Five Case Model.
- **HRA (Habitats Regulations Assessment):** Assessment of whether a plan/project will adversely affect the integrity of a European site.
- **HVDC (High Voltage Direct Current):** Transmission technology allowing long-distance and efficient power transfer.
- **ISH (Issue Specific Hearing):** A hearing within the DCO examination process focused on specific issues such as HRA or alternatives.
- **JNCC (Joint Nature Conservation Committee):** Statutory adviser on UK and international nature conservation.
- **NNR (National Nature Reserve):** Nationally important habitat protected for conservation and public enjoyment.
- **NPS (National Policy Statement):** Government statement of policy used in decision-making on nationally significant infrastructure projects.
- **PEIR (Preliminary Environmental Information Report):** Pre-application consultation document providing baseline environmental data.
- **Ramsar:** Wetland site designated under the Ramsar Convention for international importance.
- **SPA/SAC (Special Protection Area / Special Area of Conservation):** European site designations protecting habitats and species of importance.
- **VfM (Value for Money):** Assessment of whether a project delivers best use of resources, including wider societal outcomes.
- **VSC (Voltage Source Converter):** HVDC converter technology enabling compact design, improved control, and reduced footprint.

Signed

Stephen Byrne: The Ramsgate Regeneration Alliance

John Walker: Chairman The Ramsgate Society

Michael Ashley; Hon Sec. The Ramsgate Society

20th September 2025