

SEALINK Options SUBMISSION

Sea Link Development Consent Order Examination
[Your Reference / Interested Party Number]

1. Purpose of this submission

This submission is made to assist the Examining Authority in determining whether the Applicant has demonstrated that the chosen converter station location and configuration represent the **least damaging feasible solution**, having regard to environmental sensitivity, technological options, land use compatibility, and deliverability.

This submission does **not oppose the Sea Link project in principle**. Its purpose is to ensure that a project of national significance is implemented using the most appropriate and future-proofed choices, while minimising avoidable environmental and land-use impacts.

2. Richborough Energy Park – previously preferred converter location

The Applicant’s earlier routeing and siting work identified “**Converter Area A – Richborough Energy Park**” as the initially preferred Kent converter location. This reflected:

- proximity to existing grid infrastructure,
- established industrial/energy land use,
- potential to avoid higher flood-risk areas,
- reduced connection distance.

This represented an **area of search**, not a fixed plot. The examination record does not include a scaled layout showing where within the Energy Park the converter would have been located, nor does it provide a transparent explanation demonstrating why that preference later changed.

3. Current Energy Park context and coexistence with battery infrastructure

Richborough Energy Park remains an active and expanding strategic energy infrastructure site, currently hosting:

- HVDC converter infrastructure (Nemo Link),

- grid-scale battery energy storage,
- ongoing energy development.

Planning permission for the battery installation was granted in September 2024. The examination record does not indicate that the Applicant objected to that development on the basis that it would compromise delivery of Sea Link as nationally significant infrastructure, nor that land was formally safeguarded for Sea Link at that location. This raises a legitimate question as to whether coexistence was considered feasible at that time, or whether Richborough was no longer treated as a required converter site.

4. Technology-adjusted feasibility (compact / stacked HVDC configurations)

Modern HVDC converter configurations using compact VSC technology, indoor GIS, and vertically stacked equipment are widely recognised as materially reducing horizontal landtake compared with conventional layouts.

Based on publicly available engineering precedents, compact configurations are typically of the order of **3–6 hectares permanent footprint**, broadly comparable to infrastructure already accommodated within Richborough Energy Park. The examination record does not demonstrate whether such configurations were evaluated when considering Richborough feasibility.

Accordingly, it remains unclear whether any identified constraints at Richborough were **absolute site limitations** or dependent upon the assumed design envelope.

5. Need for a demonstrable “fit test”

The current record does not provide a scaled constraints plan demonstrating:

- where the converter would have been located within Richborough,
- the effect of existing infrastructure, easements, and land use,
- whether a reduced-footprint configuration could be accommodated,
- whether constraints are absolute or design-dependent.

In the absence of such evidence, the feasibility of Richborough cannot be verified either way.

The Applicant is therefore respectfully requested to provide:

- A scaled layout showing available and sterilised land within Richborough Energy Park,
- An overlay of a reduced-footprint converter configuration,
- A table identifying which constraints are absolute and which are design-dependent.

6. Water environment, aquifer and floodplain sensitivity

The Environmental Statement confirms that:

- the Stour Marshes and floodplain are highly sensitive,
- groundwater and drainage interactions are material,
- deterioration of water body status must be avoided,
- flood and groundwater conditions are key environmental factors.

Given this sensitivity, the selection of a large-footprint installation within a floodplain environment requires particularly clear justification. The examination record does not present a transparent comparative assessment showing that the chosen location represents the least damaging feasible option in water-environment terms.

7. Programme, delivery and time-to-completion

The submitted programme reflects an assumed design and layout. Alternative configurations — including compact or modularised arrangements — can materially affect construction duration and time to energisation.

Earlier completion would accelerate system benefits and revenue generation, potentially offsetting higher capital costs associated with reduced-impact designs. The examination record does not demonstrate whether programme sensitivity to design alternatives has been assessed.

8. Transparency of alternatives assessment

The Applicant's earlier documentation confirms that alternatives must include **design, technology, size and scale**, yet the examination record does not clearly evidence a transparent comparison between:

- Richborough and the chosen location,
- conventional and compact converter configurations,
- footprint and environmental consequences,
- programme and delivery implications.

This leaves uncertainty as to whether the selected option represents the least damaging feasible solution.

9. Constructive position

This submission does not seek to delay or prevent implementation of Sea Link. Rather, it seeks to ensure that:

- site and design choices are demonstrably optimal,
 - environmental and groundwater impacts are minimised,
 - future-proof and proportionate infrastructure is delivered,
 - alternatives have been transparently assessed.
-

10. Matters for clarification

The Applicant is respectfully requested to clarify:

1. Where within Richborough Energy Park the converter was envisaged during earlier studies.
 2. Whether coexistence with the battery installation was assessed and how this affected feasibility.
 3. Whether reduced-footprint / compact converter configurations were evaluated.
 4. Whether any constraints at Richborough are absolute or design-dependent.
 5. Whether programme duration is sensitive to converter configuration and site selection.
 6. Whether a transparent comparative assessment of environmental and water-environment impacts has been undertaken between alternative siting and design options.
-

11. Conclusion

The earlier identification of Richborough as a preferred converter location, combined with the absence of a transparent technology-adjusted feasibility assessment, leaves uncertainty as to whether the current proposal represents the least damaging feasible solution. Clarification of the above matters would assist the Examining Authority in reaching a fully informed decision.

Additional Comment:

Water environment and site comparison

The Applicant's Environmental Statement confirms that infrastructure development can adversely affect groundwater, surface water and drainage regimes, and that development must avoid deterioration of water body status in accordance with the Water Framework Directive. The Statement further acknowledges flood and groundwater vulnerability at Minster Marshes and the need to steer development to areas of lowest flood risk where possible. Independent engineering evidence from Richborough Energy Park demonstrates that major energy infrastructure, including a multi-hectare impermeable platform, has been successfully engineered in an environment characterised by shallow groundwater and tidal

drainage constraints. This confirms that water environment challenges are material but manageable through design and mitigation. In these circumstances, a transparent comparison of water-environment consequences between alternative siting and design options remains necessary to demonstrate that the selected proposal represents the least damaging feasible solution.