

From: Stephen Byrne [REDACTED]
Sent: 12 March 2026 17:22
To: South East Anglia Link <SouthEastAngliaLink@planninginspectorate.gov.uk>
Subject: Re: Sea Link Deadline 5 submission

Thank you for your note.

I confirm that I have used AI for research in the generation of my submissions. Specifically, I have used three AI systems - Chat GPT, Anthropic Claude and Deep Seek. I have done so with the specific purpose of cross testing through this group of AI systems the validity and veracity of responses from other AI systems. For clarity, a response from Chat GPT would be submitted to Claude for validation and verification and the third system Deep Seek would be required to rebut the response from Claude and suggestion mitigations. The submissions are therefore an amalgam of all three sets of responses. I am especially aware of Hallucination and bias which is why I use different systems with different learning models. For information, I call this process 'Thinket Teams' which I have evolved over the last two years. I hope that helps and would be happy to provide you with further information if needed. I was not aware that AI systems are considered inappropriate in this DCO environment. Stephen Byrne 12 March 2026 **Interested Party Reference number:** [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Sea Link (EN020026)

Final Supplementary Submission

Site Selection Proportionality, “Closest Suitable Location”, and Whole-Life Risk

Interested Party Reference: [REDACTED]

From: Stephen Byrne

Date: [Insert Date]

1. Purpose of this Submission

This submission addresses the proportionality of the Applicant’s selection of Minster Marshes as the converter station location.

It focuses on:

1. The “closest suitable location” contention;
2. The absence of quantified route-length comparison;
3. The environmental and hydrogeological risk differential between Minster and Richborough;
4. Construction and whole-life maintenance complexity;
5. The need for transparent clarification of the site selection evolution.

This note does not rehearse earlier submissions but seeks to assist the Examination in ensuring that the balance required under the National Policy Statements is demonstrably evidence-based.

2. Chronology and Site Evolution

The Applicant’s *Main Alternatives Considered* chapter identifies Richborough (Area A) as initially preferred, citing shorter HVDC and HVAC routes.

Planning permission for substantial Battery Energy Storage System (BESS) infrastructure at Richborough was granted in September 2022, with earlier phases approved in 2021.

The Sea Link DCO application submitted in March 2025 identifies Minster Marshes as the preferred converter location.

It is therefore clear that:

- Richborough was at one stage preferred notwithstanding BESS consents;
- The shift to Minster occurred subsequently;
- The precise decision point and technical trigger for that shift are not clearly dated in the public record.

The Examination would benefit from explicit clarification of what materially changed between the stage at which Richborough was preferred and the stage at which it was set aside.

3. The “Closest Suitable Location” Contention

National Grid has advanced Minster as the “closest suitable location”.

However:

- Earlier appraisal documentation described Richborough as enabling shorter HVDC and HVAC routes.
- No simple side-by-side distance table has been provided in the application documents.

Given that “closeness” is measurable, the Examination cannot assess proportionality without quantified data.

It is likely that both sites lie within a relatively confined geographic envelope and that route-length differences are a matter of several kilometres rather than orders of magnitude.

If this is correct, then the question becomes one of balance:

Are modest route-length differences proportionate when weighed against materially different environmental risk profiles?

4. Environmental Risk Differential

Minster Marshes presents the following characteristics:

- Low elevation (low AOD) with tidal influence;
- Flood Zone 2 designation in parts;
- Shallow groundwater conditions;
- Location above a Principal Chalk Aquifer in a water-stressed region;
- Undeveloped marshland setting.

Richborough Energy Park is:

- A long-established brownfield industrial platform;
- Historically used for major power infrastructure;

- At comparatively higher elevation;
- Already hosting substantial energy installations.

This is not an argument that Minster is unbuildable.

It is an argument that the environmental and hydrogeological exposure profile of Minster is materially different.

If route-length savings are modest, the Examination must determine whether those savings justify greater long-term aquifer, flood and marshland interface risk.

5. Construction and Whole-Life Complexity

From a geotechnical and maintenance perspective:

Minster Marshes is likely to involve:

- Greater ground improvement and platform engineering;
- Higher groundwater management complexity;
- Greater flood-interaction design requirements;
- Increased corrosion and drainage management over 50+ years.

Richborough, while potentially involving contamination management and spatial constraints, is an established industrial platform with long history of heavy infrastructure use.

The key issue is whole-life risk exposure.

For nationally significant transmission infrastructure expected to operate over multiple decades, whole-life resilience should weigh materially in the site selection balance.

6. Proportionality Under the National Policy Statements

Under EN-1, site selection must demonstrate that environmental impacts have been avoided where reasonably practicable.

If the distance differential between Minster and Richborough is modest, the Examination must consider:

- Whether marginal engineering efficiencies outweigh increased environmental sensitivity;
- Whether the brownfield alternative was proportionately reassessed following BESS consents;
- Whether the decision pivot was driven primarily by substation connection engineering rather than land suitability.

This is a matter of transparent balancing rather than opposition to infrastructure.

7. Clarifications Sought

To assist the Examination, it is respectfully requested that the Applicant provide:

1. A quantified comparison table showing:
 - HVDC landfall-to-converter route length (km) for Minster and Richborough;
 - Converter-to-grid connection works length (km) for each option;
 - Total route-length differential.
 2. An estimate of CAPEX differential using the Applicant's own unit assumptions.
 3. A brief technical note clarifying:
 - Whether Richborough was excluded primarily for spatial, electrical or programme reasons;
 - Whether a compact layout solution at Richborough was tested against the consented BESS envelope.
 4. Confirmation that whole-life groundwater, flood and maintenance risk were explicitly weighted in the comparative appraisal.
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8. Additional Related Matters

In the interests of completeness, the Examination may also wish to consider:

- Whether climate change allowances over the full operational life have been comparatively assessed between sites;
- Whether long-term groundwater monitoring obligations differ materially between the two locations;
- Whether brownfield preference principles were fully tested before selecting undeveloped marshland;
- Whether the grid resilience implications of each connection arrangement have been comparatively evaluated.

These are not objections but legitimate proportionality questions.

9. Conclusion

The issue is not whether Minster Marshes can technically host the converter station.

The issue is whether, in light of:

- The earlier preference for Richborough;

- The likely modest route-length differences;
- The materially different environmental and hydrogeological exposure;
- The increased whole-life complexity associated with marshland construction;

the balance struck by the Applicant has been demonstrated with sufficient quantified transparency.

A concise, data-based comparison would materially assist the Examination.

Stephen Byrne
Interested Party – [REDACTED]

If you wish, I can now:

- Produce a concise 3-minute oral version of this submission for hearings; or
- Provide a one-page annexed comparison matrix that visually summarises Minster vs Richborough across engineering, environmental and proportionality criteria.