

## Open Hearing 2 Session 3 – Written summary of my oral submission

Planning Inspectorate ref: EN020026

My ID: [REDACTED]

- 1) Notwithstanding that I believe there is no need for Sea Link as there is a better, cheaper and more economically friendly solution that satisfies the need for additional infrastructure, I will address the specific issue of Change 1.
- 2) I do not believe the Applicant can justify the increase in order limits simply by saying it gives them more flexibility.

In my REP4-209 I explained why areas that had already been ruled out by the Applicant, such as the area around the Manston Outfall, should be excluded from the change to the order limits.

They cannot give an increase in flexibility if they can't be used and I would urge the Ex A to **not** allow these areas to be included within the new order limits.

Due to the need to avoid the saltmarsh as stated in CR1a-002 and from the alternative routes shown in REP3-070, the Applicant has ruled out using the southern edge of the apron.

This area can and should also be removed from the order limits.

As the Ex A are aware EN1 5.4.35 – states that “the Applicant should demonstrate that during construction, they will seek to ensure that activities will be confined to the minimum areas required for the works.”

Thanet District Council (TDC) are opposed to the use of the Hoverport:

“TDC objects to the proposed activity of siting and operating up to 40-tonne vehicles on the former hoverport site, particularly involving crossings over the concrete skirt into Pegwell Bay. The potential for environmental damage outweighs the operational benefits; and alternative access methods should be considered and prioritised.

Should the Examining Authority determine that some form of site access is unavoidable, TDC recommends the imposition of the following commitments to safeguard Pegwell Bay from contamination risks caused by structural damage. These commitments emphasize prevention, monitoring, and rapid response”.

One of the conditions stipulated by TDC is:

“Vehicles and machinery must not directly traverse the edge of the concrete skirt. Instead, access should be facilitated via engineered ramps or temporary bridging structures designed to distribute weight and prevent direct contact with the skirt. These structures must be constructed from non-contaminating materials (e.g., geotextile-reinforced matting) and approved by an independent structural engineer prior to use. The hoverport area and all access points must be pre-assessed via non-invasive surveys (e.g., ground-penetrating radar) to identify weak zones”.

The use of an engineered ramp or temporary bridge would have the benefit of giving certainty to the route used by the Applicant and would reduce the area of the Hoverport required to give “flexibility”.

The Hoverport is used extensively by the public and every effort must be made to minimise the area lost to them. TDC have also asked for wheel-washing as the vehicles move from the Hoverport to the intertidal region and back so land needs to be set aside for that but that should still leave the majority of the site available for the public to use. This is, of course, dependant on the Applicant allowing adequate access but this was discussed in my REP4-207, REP4-208 and particularly REP5-154.

The Ex A must decide on the request to change the order limits and based on my previous points it is my belief that the area required by the Applicant could be reduced to the area highlighted in purple in the map below including the wheel-wash and bridge:



### 3) The need for surveys

The fact that the Applicant talks of the need for flexibility shows that they have no idea which areas are suitable for use. If a suitable structural survey had been carried out, they would know and they would not need to set aside land that is unlikely to be used.

It is not acceptable to wait until after the DCO has been granted for them to then carry out a precondition survey. What happens if there are no suitable routes following this survey?

We know from Thanet District Council that Edge Enviro was granted permission under Section 172 of the Housing and Planning Act 2016 to carry out survey work at the Hoverport presumably for the Applicant. This permission was granted in October 2025.

Do we know if any surveys have been carried out by them?

4) The route across the apron passes within 10m of dense vegetation which has been acknowledged by the Applicant in AS-093 to be suitable for reptiles. No doubt the Applicant will argue, as they did during ISH1, that the effect of very noisy equipment of up to 99dB is not significant because it is just passing by.

The reality is very different, and it will cause serious disturbance to creatures living within that habitat. The routes as they stand are totally unacceptable.

On the morning of the 18<sup>th</sup> March 2026, by coincidence exactly a week after the unaccompanied site visit by the Ex A, I was lucky enough to accompany [REDACTED], a recognised wildlife photographer on a visit to the Hoverport. Whilst there we were able to witness a Greenfinch, which are on the Red List, the location of Bee Orchids and the rosettes of Lizard Orchids which are a protected species. I was also shown the locations of reptile maps, one of which is within 10m of the proposed route. Although it was too early for these to be occupied, Slow worms, Grass Snakes and Common Lizards have all been spotted

there previously. One of the grass snakes found at Pegwell Bay was apparently due to be part of the BBC Springwatch but didn't make the final edit.

Both the photographs below were taken at the Hoverport. The first was taken on 18<sup>th</sup> March 2026 and the second taken previously when it was in flower.



Lizard Orchid Rosette



Lizard Orchid (photo courtesy of Keith Ross)

Just before we left, [redacted] spotted a pair of long tailed tits in the distance and he told me that they were preparing their nest. The nest site was in undergrowth that is on the intended route across the Hoverport. [redacted] stayed afterwards and quietly filmed them and I have a copy if the Ex A wish to see it.

Both the photographs below are stills taken from videos by [redacted] and published in the last 3 weeks.



Common Lizards at the Hoverport



Long tailed tit nest building on the proposed route



The photographs indicate the location and proximity to the route of the observed wildlife. Obviously, the reptiles will not just be located under the mats but are likely to be found in and around that area when it is warm enough to do so.

**5) Conclusion:**

- I object to the project in its entirety because there is a more efficient and economical solution.
- There is no justification for the Compulsory Acquisition of such a large area of the Hoverport.
- I ask the Ex A to reduce the size of the order limits on the Hoverport site.
- The Applicant needs to ensure easy access for all members of the public that want to use it.
- The Applicant should carry out the necessary surveys of the Hoverport.
- The route selected by the Applicant is totally unsuitable because of the devastating effect on Fauna and Flora.
- I would urge the Ex A to request that the Applicant finds an alternative way of accessing the intertidal area that doesn't use the Hoverport and doesn't involve damaging the Saltmarsh.