

Andrew McDonald [REDACTED]

Project: SEA LINK EN020026

Written Representation at Deadline 7 in respect of the Applicant's Additional submission 9.154 of 25/04/2026, proposing DCO drafting changes to post-consent discharge functions [AS-167].

I am making this submission to add my voice to concerns widely expressed at this late submission, which would, if accepted, seriously damage the representation of local communities through the potential elimination of the role of the local planning and Highways Authorities in the discharge of requirements for this Proposed Project.

- I appreciate that the background to the proposal (and indeed to the Project itself) is the Government's clearly expressed wish to sweep aside any and every local process or authority that would impede the development of offshore wind generation and its onshore transmission through the Grid, but that wish is still subject to legal and procedural obligations being correctly followed, and this is an attempt to subvert those obligations.
- The Fingleton recommendation was simply that a Unit be set up to process discharge requirements and then consult upon them with local planning authorities to secure 'local authority involvement'. This was to apply solely to nuclear development. Guidance would need to be updated to implement the use of the new Unit. The DESNZ response extends this proposal to 'energy transmission networks', and that's the situation as it stood at March 15th 2026. No further details have been issued, nor proposals for an implementation timetable; no Unit has been set up, and no team at DESNZ yet seems to exist within which the Unit would sit.
- On this basis, to propose detailed changes to a legal document, importing the outline wishes of DESNZ for an as yet undefined process into a pivotal role in the delivery of a thoroughly contentious project is completely unreasonable.
- It is more unreasonable still in the way it has been introduced – four working days before the final deadline for public comment on the Application and the Draft DCO, although nearly six weeks had passed since the DESNZ proposals were made public. There will be no chance of a proper discussion or examination of the changes at this stage, with the Examination stage closing 6 working days after its submission.
- Finally, the Applicant has made a bold addition to the draft change proposed, over and above the published process, by suggesting that the DCO should include the Applicant's option to *choose* whether the new DESNZ Unit or the existing planning mechanisms should be used in the discharge process. No justification is made for these additional powers.

I very much hope that the Examining Authority will dismiss this proposed DCO draft change, and allow the DESNZ to make its own proposals for the transitional stages in what is, from my perspective, yet another blow to local accountability and responsibility, at the end of what has been a process of continuing pressure from the Applicant to downgrade and discount local perspective, knowledge and expertise.

Andrew McDonald

29/04/2026