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Via Electronic Submission

Dear Planning Inspectorate,

SEA LINK DEVELOPMENT CONSENT ORDER (DCO)

Thanet District Council Summary Statement Deadline 7

This document sets out the Summary Statement of Thanet District Council's (TDC) position on the proposed Sea Link Development Consent Order. TDC wishes to express thanks to the Examining Authority for their approach to engaging with the local community of Thanet, ensuring that opportunities have been provided to residents, interest groups, councillors and statutory and non-statutory consultees to engage with the process and express their views. As outlined below, TDC still holds the view that significant concerns remain about the impact of the project on the district, however we appreciate the Applicant's communication with TDC throughout the examination in relation to the production of additional information and providing updates on the development of the project. In the event that the Development Consent Order (DCO) is granted by the Secretary of State, TDC will work with the Applicant to ensure all impacts are minimised as far as possible and any potential benefits are realised and maximised for Thanet residents and the environment.

Council Position

TDC adopted the following motion at a full Council on the 8th December 2023:

"Council acknowledges the considerable public concern over the impacts of National Grid's Sealink project, which is currently the subject of a statutory consultation process. We share this concern, and wish to reassure residents that their views are heard and understood. We recognise the need to adapt the electricity transmission network in order to respond to rising demand and the move to sustainable generation methods in new locations. We welcome the extensive engagement by National Grid with both elected members and the communities in Thanet most affected. Council agrees that it does have major concerns regarding the proposed location on Minster Marshes; the scale of the converter building, as well as the effects of the associated infrastructure; the significant impact on protected wildlife and species habitat both during construction and afterwards; and the potential change to the character of the landscape."

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TDC's concerns have been set out in the Local Impact Report [REP1-132] and further submissions throughout the examination process, with the final Statement of Common Ground (SoCG) and Principal Areas of Disagreement Summary Statement (PADSS) submitted at Deadline 7. The following matters are highlighted to the Examining Authority for consideration:

Landscape - Contrary to Policy SP26

The development would be in direct conflict with Policy SP26 of the Thanet Local Plan (Landscape Character Areas), meaning that the development should only be permitted if it can be demonstrated that the development is essential for the economic or social well-being of the area.

Landscape and visual impacts - viewpoints and Stour Marshes Landscape Character Area (E1)

TDC considers that the sensitivity of some of the viewpoints (specifically those looking across the Minster Marshes) have been undervalued and the adverse visual effects identified would be greater than the assessed level.

The Stour Marshes Landscape Character Area (E1) has been determined as experiencing a moderate (significant) adverse effects during construction and year 1 of operation, however TDC considers that the impact would be a major (significant) adverse effect for the full duration of the project given the location, scale of development (in particular the converter station and substation) and the limitations of the landscape mitigation proposed (as accepted by the Applicant). The Applicant has also conceded that no additional planting can be provided within the Order Limits as this planting would be contrary to the defined characteristics of the Stour Marshes Landscape Character Area (E1).

Ecology

TDC has significant concern in relation to the impact the project will have on habitats and protected and notable species which, it appears, will result in significant harm to ecology at the local level. These concerns include: construction timing, tunnelling and potential habitat destruction, habitat loss, noise pollution, light pollution, bird strikes and infrastructure hazards, carbon footprint and flood risks, inadequate mitigation measures, water runoff and pollution, seal population disturbance.

Agricultural Land and Soils

Loss of Best and Most Versatile (BMV) Land

The cumulative impact of buildings (converter station and substation), areas for parking and access roads, would result in a large scale loss of BMV land. The Applicant accepts there is the permanent loss of BMV land and temporary impacts to soil function and disruption to soil ecosystem services during construction is a significant residual effect with no further mitigation available.

Decommissioning - Agricultural Land Classification (ALC)

The Environmental Statement identifies that following decommissioning the land would be returned to its pre-decommissioning ALC grade which is assumed to mean the ALC grade prior to the

development. In addition, Chapter 4 states that the access road is to be left in situ. This is then found to be a moderate to major beneficial effect that is significant within Part 3 Chapter 6 Agriculture and Soils [PDA-023]. However, this does not represent a beneficial effect as, with or without the development, the ALC grading remains the same but the land is unable to be used for agriculture. Therefore, the effect is negligible.

Hoverport

Coastal Impacts

TDC is opposed to the use of the mudflats and the hoverport with the potential impact on protected species and qualifying features of the designated sites.

TDC would like to clarify that the potential instability of the hoverport has the potential to have an adverse effect on ecology (reptiles). This structural instability could lead to further degradation and there is a risk of contamination leaching into the environment through the hoverport.

Land Ownership

TDC notes the rights sought by the Applicant for the compulsory acquisition of rights over Council owned land. This is subject to separate discussion with TDC's Assets Team and the Applicant.

The Book of Reference does not outline the compulsory acquisition of any land of TDC outright.

Socio-economics, Recreation and Tourism

Construction Impacts - Attractiveness for Tourism and Recreation

TDC has significant concerns with regards to the negative impact construction and associated traffic will have on both residents and visitors which will in turn discourage people from visiting the District. The site is located at a key entry point to the District. Thanet also hosts a number of events throughout the year with many taking place over the summer months.

Further to this, there is a wider perception issue that could occur from a prolonged construction period where the construction activities could result in a negative perception of Thanet as being a destination for tourists.

This includes disruption, noise and visual impacts to the PRow network and coast, impacting potential tourism and the enjoyment of this area for recreation. There is also a concern that due to the length of the construction period, this will serve to discourage the use of the area for recreation and tourism in the long term and affect the sense of place.

Construction Impacts - Accommodation

The tourism capacity analysis from the Applicant lacks the detail to sufficiently inform the potential impact of the proposed development as it did not include the type or cost of rooms available for potential construction workers. TDC remains concerned that the proposed development will have an adverse effect on local tourism and accommodation.

Operational Impacts

The Council considers that the introduction of significant large-scale energy infrastructure to the local area will generate a negative perception of the local area being suitable for recreation and tourism. It will significantly change the perception of the area from one that is tranquil and remote to an area that is industrial and thus less attractive for visitors and users of the PRoW. The proposed development directly conflicts with the special characteristics of the Stour Marshes Landscape Character Area (E1) which makes the area attractive to visitors.

Climate Change

Whilst it is understood that the Proposed Project is part of UK policy to decarbonise the electricity grid and transition to net zero by 2050, concerns are raised about the levels of embodied carbon which would be associated with the construction of the Project. TDC has committed to work towards carbon neutrality by 2030 within the published Net Zero Strategy, with the aim of net-zero on Thanet wide emissions by 2050. The Proposed Project would have the potential to affect TDC's ability to meet this target and the implications of the construction project on district-wide targets should be fully appraised.

Cumulative Impacts

Construction - Inter-project Effects

TDC has significant concerns regarding the list of cumulative sites which omits a number of sites that TDC consider should be included, particularly in regard to the traffic and transport impacts on the A229. It is understood that the applicant is reviewing this information in light of our comments in the SoCG.

TDC is of the view that there are additional developments within a 5km radius of the site as identified within the Inter-Project Cumulative Effects Assessment Update - Technical Note [REP6-098] which have not been shortlisted. Due to their proximity to the site, there could be likely significant cumulative effects arising from traffic and transport and landscape and visual amenity. The justification for excluding these sites from the short list given their proximity is insufficient. Therefore, the Council cannot confirm if the proposed mitigation to address the cumulative effects is sufficient. However, it is understood that relevant mitigation measures have already been imposed for the relative topics with limited additional mitigation available.

Operation

TDC raises concerns regarding the cumulative impact of energy projects in this location and the potential need for further expansion within and potentially beyond the Draft Order Limits to satisfy future energy infrastructure demands. The proposed development may lead to a precedent that this area is acceptable for energy infrastructure and other similar development.

Decommissioning

TDC considers that the definition of decommissioning is unclear and Requirement 13 excludes the substations from decommissioning. Therefore, TDC considers that decommissioning should be defined within the DCO and Requirement 13 amended to include the substation.

Skills and Employment Plan

TDC acknowledges that a Detailed Skills, Supply Chain and Employment Plan [REP6-101] has been submitted. However, it is requested that this is provided as an outline document to enable the detailed plan to be approved by TDC to ensure the plan is sufficient, specific and relevant to the area.

ExA suggested changes to draft DCO

TDC has reviewed the Examining Authority's schedule of changes to the draft Development Consent Order (dDCO) [PDA-024] and the proposed changes are welcomed. Should the development be granted, the positive changes proposed to the dDCO would allow direct Local Authority input into detailed design and appropriate mitigation, for example in relation to construction hours and built form.

Yours faithfully



Planning Applications Manager