Submission ID: S2980F1A1

Dear Secretary of State,
There are many points that I can make and need to make in relation to this application; the impact it has already had on our area and will potentially continue to have dependent on this decision, and the latest submissions from interested parties; however, I believe the vast majority of these points are addressed by a single paragraph.
Paragraph 5.4.53 of the 2024 NPS EN-1 states that
“The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of any irreplaceable habitats, including ancient woodland, and ancient and veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists.”
There is no question, within anyone’s mind, from a statutory, ecological or community standpoint, that this proposal will result in significant loss, damage to and ongoing deterioration of completely irreplaceable habitats.
There is no disagreement on this point from national, international and local authorities; this area is already protected as an SSSI, with a comprehensive list of endangered and red list species, providing essential grounds for eels, amphibians and reptiles, breeding grounds for endangered birds and wading species, and spanning precious coastal saltmarsh and chalk habitat.
Chalk habitat is already acknowledged to be an irreplaceable habitat, and, as discussed by Kent Wildlife Trust in their submission, one that cannot be compensated for in terms of loss due to the ongoing degradation of disturbed chalk habitat. There can be no mitigation for this loss, and no “suitable” compensation strategy; it is, by definition, impossible to replace the irreplaceable.
As such neither of the two conditions for development can be met; there are no “wholly exceptional” reasons for the placement of this proposal; only proposed cost efficiencies (which can never and should never be considered an “exceptional” reason for development) and the absolute impossibility of ever formulating a “suitable compensation strategy” for the loss of irreplaceable habitat.
From that standpoint alone, by very definition granting consent for this project would go against national guidance, as there is no argument that can be made to argue that this is not irreplaceable habitat, that there are “exceptional” reasons, and that our chalk habitat can somehow be compensated for, repaired or maintained after damage; indeed, as KWT discuss, recent experience shows that not only can initial damage related to construction not be repaired or compensated for, but that outlying habitat not directly disturbed is also shown to accrue damage along a much longer timeline than known or expected, multiplying the damage to irreplaceable habitat.
Thanet District Council have continually raised concerns and voiced our opposition to this proposal; this included a Labour motion directly opposing the development and supporting those who seek to protect our biodiversity, heritage, environment and ecology, which was unanimously backed by all Councillors and political parties in Thanet.
We have been continually cornered and let down by the rigidity of planning permissions in relation to DCO’s, which effectively allow applicants to force authorities to give permission for investigatory works, leaving local Councils and authorities with the choice of accepting works in order to control and minimise disruption, or having those permissions forced on them regardless due to the intrinsic permissions within this process.
We have, in effect, been forced to fight for our area whilst also fulfilling our formal and legal obligations in relation to Planning, which forces us to take part in a proposal we do not and have not supported in order to have any chance of influencing or protecting our home.
We are not seeing any benefits to our local community from this proposal, which again, is supposed to be an integral part of any infrastructure project permission.
A £1.1 million “Community Fund” in an area this deprived is quite literally nothing, and will do nothing; not only from the perspective of not even touching the proportionality of damage done from a biodiversity and irreplaceable habitats standpoint, but also from the very real standpoint of the costs involved in making a long term difference to deprived communities.
We have individual community projects that cost over eight times the proposed “Community Fund”; and yet we are expected to believe that £1.1 million is suitable mitigation for the damage done, and that it has any chance of making any difference to lives locally. It doesn’t, and is grossly inadequate and insulting to our community, especially in the face of the scale of loss we are facing.
The level of work this proposal has required from our community, in understanding, campaigning and commitment has been beyond extraordinary. These are not easy processes to access, understand, influence or be part of. From a community standpoint, and even from a local government standpoint, they are arcane, labyrinthine, inaccessible and isolating. These are not processes that make communities feel welcome or wanted. They make us feel like an unwanted fringe trimming central policy priorities; our viewpoint is required, but not respected, and not relevant to larger aims.
I want, very much, to be wrong, and for these systems to become more responsive and more locally led. I am a Labour and Co-operative Councillor, and the Deputy Leader of a Labour Council; I fully understand the necessity for energy independence, investment in renewables and the necessity of infrastructure. But what we have been trying to express as a community is not an opposition to infrastructure full stop, or to national priorities; obviously, more affordable and reliable energy supplies are essential for all of us. It is simply an absolute desperation to be heard when the proposal made is being made for entirely the wrong reasons, in entirely the worst location, and irrevocably changes our home, our ecosystems, our biodiversity, and endangers the species and the habitats that we know and love and are intrinsically connected to.
In the previous responses you have heard from the TFA that the drift proposals are insufficient; you have also heard from KEIFCA that even at this late stage, effective mitigations and planning are still not in place and would need further oversight, and even all of this pales into insignificance against the fact that there is a strict prohibition on the destruction of irreplaceable habitat, and that neither of the exceptions listed apply, as the only reason for this location choice is, bluntly, that it was cheaper to construct in this area than in others.
That is not an adequate reason to lose irreplaceable habitat and the trust and belief of a community who do, very much want to support national energy provision and infrastructure; just in the right place, with the right mitigations.
At the Energy Matters conference on the 14th of October you very eloquently pointed out that our current energy systems simply aren’t working, at a strategic and consumer level.

Your statement that “ - even the best companies cannot compensate for a system that lacks sufficient coordination and long-term direction” and that our existing systems have been “failing in (the) central purpose of providing this essential good to the British public” is entirely correct, and well supported.

I agree wholeheartedly; but equally I would argue that this does not exist in a silo that contains only energy related infrastructure. Like our ecosystems, our decisions are interlinked; we cannot make a decision in one area of policy without having profound impacts, intentional or otherwise, on other areas of policy; and this proposal is a perfect example.

Our coordination and long term direction has to hold our ecological commitments at the heart of decision making; as if it doesn’t, no amount of off site BNG credits can ever make up for the loss of essential and irreplaceable habitats, and the reduced impact we seek to have in terms of renewable energy provision will be wholly undermined by the long term carbon impact of the infrastructure decisions made today.

Thanet is my home; I care this much and have worked so much precisely because I spend any free time I have on our beaches, coming across fossils preserved by our chalk hundreds of millions of years ago, seeing our slow worm and amphibian populations grow in the habitats that they have carved out for themselves, and seeing the natural changes in our habitats and coastlines over the decades that I have lived here.

But these proposed changes are not natural. They are not controlled, not proportional, and not justified; and they are not accepted by our community.

I know that we all share the same priorities; but equally I also know that we will never achieve those priorities if we undermine the ecological foundation they stand on.

I ask, with full respect and full understanding of the weight of these systems and decisions, for that foundation, and this site of extraordinary ecological importance, to be remembered and saved.

Yours Faithfully.

Councillor Helen Whitehead