From: Cllr-Kevin Pressland
Sent: Thursday, October 29, 2026 11:59
To: Cllr-[redacted]
Cc: South East Anglia Link; Thanet Greens; TDC_Green Group; Save Minster Marshes
Subject: Fw: Re: Further Response

Dear Cllr [redacted]

I entirely agree with your sentiment [redacted] and it's clear to me this is a done deal as far as the government is concerned. The government is also just creating an illusion of listening to the public's concern but having no intention of really listening.

Kind Regards
Kevin

On Thu, 22 Oct 2026 at 10:29, 'Cllr-Rebecca Wing' via TDC Green & Independent Group <TDC_GreenGroup@officer.thanet.gov.uk> wrote:
Dear Planning Inspectorate

Please accept the following as a further response to the concerns I have as both a resident and Town/District representative, to the proposed NG SeaLink project in East Kent. In addition I would like to express my concern as both a resident and councillor, living and repenting the community of Central Harbour in Ramsgate, in relation to the fact we have had no representation from our MP Polly Billington, with regard to this proposal. She has made several public statements that she is now 'unable to comment, given her appointment as Under Secretary to the Minister for Energy'. This situation is grossly unfair, we have no voice in Parliament and it is felt that steps should be taken to address this situation, how can something as serious as this not have a constituency MP that can listen and represent the very real concerns of the residents they represent, it is simply too shocking for words!

Cllr [redacted]
Councillor for Central Harbour Ward
Green Party

PLANNING ACT 2008
APPLICATION BY NATIONAL GRID ELECTRICITY TRANSMISSION FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR SEA LINK

PINS REFERENCE: EN020026

INTERESTED PARTY SUBMISSION: Councillor Rebecca Wing TDC & RTC
Central Harbour Ramsgate

INTRODUCTION: This is the written submissions of Councillor Rebecca Wing in relation the 'All Interested Parties Consultation for SeaLink DCO Examination', which seeks to address a number of issues as a consequence of the communication from the Secretary of State dated 28 August to all Interested Parties.

Paragraph 3: Benthic Mitigation Plans:
It is vital that any decision to approve 'conditions' the position expressed by Natural England (NE); that the plans are developed and agreed at least six months before seabed preparation, based on pre-construction surveys together with monitoring that actually tests whether mitigation actually works. There is simply too much at risk not to get this right before work starts, if approved. The need for this approach is clearly evidenced by the damage caused by the NEMO Project, from which the Saltmarsh at Pegwell Bay has not recovered, a concern Kent Wildlife Trust (KWT) has often raised, with little resulting action to take steps to address this damage to date. As a consequence it is vital conditions are put in place to ensure mitigation be agreed in advance of harm and monitoring must be vigorous, ensure also that enforcement is timely and results in action, should any harm take place. Sadly, given the failure to address damage caused through works to deliver the NEMO Project, it is hard to have any confidence in the likely success of monitoring operations to deliver the NG SeaLink Project and so it is essential any decision to approve puts in place serious systems and measures to address this.

Paragraph 4: Intertidal features Sandwich Bay to Hecklinge Marshes SSSI:
Serious concerns expressed by Natural England raised separately about Pegwell Bay are still unresolved (**C1-147 Natural England Risk & IssuesLog.xlsx**.). I am therefore extremely concerned that the Secretary of State may not be in possession of all the necessary information on which to base a well evidenced decision. This area has significant national and international environmental wealth and so to make a decision with missing information would be reckless. In addition, KWT evidence that the MMO accepted that they made an error in the discharge of the licence condition for NEMO (**C1-004**). This has resulted in the continuous erosion of the saltmarsh at Pegwell Bay, as a direct consequence of works to complete the NEMO Project. Indeed, KWT cites agreement from CEFAS, the EA and NE that the saltmarsh has not recovered after 5 years of monitoring and so lessons must be learnt from previous projects, to ensure the negative impact on this much protected environment is not repeated. Sadly, KWT also evidence that the saltmarsh has deteriorated outside the original impact zone and that as a result: *"the effects of Sea Link cannot necessarily be assessed against a baseline which assumes that the habitat is in a stable condition. A further disturbance to habitats that remain in a degraded and declining state could result in greater, more prolonged or potentially irreversible ecological effects than those predicted on the basis of an assumed stable condition."*
It is therefore, vital that the Secretary of State takes seriously the impact caused by the NEMO Project in their decision making as this much protected RAMSAR habitat has already been negatively impacted by this and it is hard to see presently, how the proposed SeaLink Project would not inflict further catastrophic damage to Pegwell Bay and its saltmarsh.

Paragraph 5: Chalk Habitat and EN-1 paragraph 5.4.53
The position held by KWT, which highlights serious concerns in relation to the NG's proposed use of "irreplaceable habitats" in relation to the ability of undersea chalk to support a complex biotope, warrants serious review during the decision-making process: *"The evidence presented during the Examination indicates that the extent, distribution and ecological characteristics of the chalk habitat had not been sufficiently established to support the Applicant's conclusion that the proposed impacts are not significant."*

These concerns need to be addressed; this unique habitat should trigger the wholly-exceptional-reasons and compensation test and believe that the Secretary of State should reconsider the proposed landfall at Pegwell Bay.

Paragraph 7: Use of Hovercraft at Pegwell Bay:
It is noted that emergency use of Hovercraft has been written into the plans and agreed by NE in July following the end of the consultation. There is concern that this lacks detail in terms of how an emergency is defined and what the resulting level of use will be. There is therefore serious concern about the possible negative impact on the environment, given the noise levels hovercraft make. Indeed, in point 7 of the Applicant's response (**C1-178** of 21 September 2026)) they have absolutely nothing to say about the possible effects of the use of Hovercraft on marine mammals and the designated site. In addition, it appears, NE are still awaiting a worst-case scenario that encompasses birds and seals, there is no documentation to evidence any communication between the NG and NE to suggest this has been provided. It is hoped that the Secretary of State would investigate this and make any documentation available to the public.

Paragraph 10: Missing Annex A from Kent OLEMP
It is good to see that the Figures in Annex A have now been provided, sadly this is the first opportunity that any Thanet residents and more importantly those who might be directly, negatively impacted by the proposed SeaLink Project have seen these images. Perhaps this reflects the 'extremely low priority' the NG places on the environment and any BNG they will be legally required to provide! As a local who places an extremely high priority on the environment for so many reasons, it is depressing to see the NG BNG plans, as some kind of 'last minute' addition. Quite frankly, it demonstrates how little the NG thinks of locals and the environment which is much loved, used and benefits our communities. I would therefore, strongly urge the Secretary of State to place the highest priority on this aspect of the SeaLink project and delay decision making so the BNG proposals can be properly scrutinised. It is also felt that there is a overall lack of 'thinking and doing' in relation to BNG, which appears as a bit of an 'afterthought' and not a high priority, given the destruction the proposals will inflict on our environment, it is tragic that so little effort has been put into the mitigating BNG plans.

Paragraph 12: Agriculture Land Classification:

It is sad to see so much 'best and versatile land' inside the Kent Order Limits (76,7ha/45%), as detailed in the NG's own Kent ALC survey (**REP7-153**, **Doc 9.31 (C)**) and the conflicting information in paragraphs 2.1.4 and 2.1.5. Of the 176 auger bores, 64 were out of scope and 3 unsurveyed because of access problems and so only 61.9% were relevant? Again, serious concerns must be expressed at the validity of some of what is being presented and the justifications for the use of valuable 'best and versatile land'. NE states that no Grade 3b must not be assigned on Flood Zone 3 alone, Grade 1 must be avoided, and the soil plan tied to restoration must be taken seriously. There appears to be no consideration of the cumulative impact of loss of 'best and versatile' farm land across Thanet, or indeed, given this is a proposed piece of national infrastructure, of the loss of this type of land across the UK and potential future impact of food security.

Paragraph 13: Converter Station Preferred Design:

The NG's SeaLink proposals seek to keep 'on the table' any of 4 converter station designs, for reasons of 'flexibility'! It is hard to see how any application large or small could 'get away with', offering 4 different sets of designs. The lack of clarity and clear decision making here by the NG must demonstrate that they want to make key decisions at a later date, possibly at the expense of 'visual impact' to others. This uncertainty, around what might or might not be built, is surely not acceptable and it is hoped that the Secretary of State will share these views and request a single design plan for the Convertor Station Hall, after all, this is not a simple shed in a garden!

Paragraph 15: Why are the Suffolk SeaLink entry/exit pits subtidal and Kent is intertidal:
The NG wishes to avoid underground drilling because this would be 2.5km longer, explaining that this would create increased spoil and carbon as the reason for not choosing this option. It is hard to believe cost was not a primary driver here and that they are aware of horizontal directional drilling (HDD), as it did with the NEMO project. They have chosen an open trenching system instead. This is extremely worrying as the environment does not lend itself to HDD. Indeed, NE notes at **C1-147 Natural England Risk & IssuesLog.xlsx** reference B1, B5, and B6, that;
"having experience of HDD failure of the Lincs Offshore Wind Farm cables and post consent geotechnical investigations for Race Bank OWF confirming that HDD was not valid in similar habitats within The Wash SAC, and HDD failures for Thanet and Nemo at Pegwell Bay itself; it is Natural England view that ***HDD failure is likely at this location****."*

They continue by adding,

"We advise that if a trenchless technique is found not to be valid then there is a high risk of an Adverse Effect on Integrity and that a full derogation case would need to be presented including appropriate compensation measures."

It is hard to see why the NG would even consider HDD given the evidence of failure in other locations and at the site they proposed, it is reckless and is too risky. Failure has a high likelihood of happening, at which point lasting damage to an internationally recognised RAMSAR site, as they revert to trenching. It is therefore important that the Secretary of State recognises this potential for disaster and insists on a subtidal underground drilling approach, which may be more expensive but a great deal safer.

Paragraph 16: Breeding Birds, Sandwich to Hacklinge Marshes SSSI
It was refreshing to see the instruction from the Secretary of State in the letter dated 9th October, requesting the provision of further detailed information in relation to Paragraphs B45 and B50 of the **REAC (REP7-360)** about pre-checks prior to breaches of 60Db limit to works in Pegwell Bay and Hacklinge Marshes SSSI. This wording seems to suggest, 'shutting the stable doors after the horse has bolted', damage from works above 60Db would already have resulted in 'harm'. The wording here needs to be strengthened and focus placed on not breaching the 60Db limit, rather than acting after it has been breached, surely this is commonsense!
Measures to restrict work during the nesting season, given the importance of the site for nesting and migratory birds, is welcome from the Secretary of State's instruction to restrict work March to September. However, NE notes that the NG has chosen to restrict this to works over 60dB between March to August and 'after a nest check', demonstrates a lack of clarity and should be changed to March to September inclusive to keep consistency with breeding season throughout the documents. This will be easier to monitor as there will be clarity for all

at present as demonstrated at B45 of the **REAC (REP7-360),** this paragraph is open to interpretation, creates a lack of clarity and puts nesting birds at risk for such an important SSSI for breeding birds. The
"installation of overhead line pylons either side of Sandwich Bay to Hacklinge Marshes SSSI will not cover the entire breeding season (March to September included) but will either take place outside the bird breeding season ***or will only occupy approximately two months of the breeding season unless otherwise agreed with Natural England****.*
It would also appear that the disturbance to breeding birds by the use of hovercraft in Pegwell Bay is also still unresolved, as previously mentioned and noted by NE.

Paragraph 19: Change to wording of oLEMP [REP7-141] in respect of bird collision monitoring to monitor for 2 years & provide diverters if needed:
Given the clear evidence presented at various hearings of ongoing and mass bird strikes (174 mute swans killed in 2003), hitting existing pylons, it is hard to accept that the Secretary of State has not already insisted on the use of bird deflectors from the start. The NG has made changes including collision monitoring for two years and to add additional diverters if NE agrees that bird collisions warrant this, but just how many more bird deaths are needed! Additionally, given this project will see additional pylons located on an extremely important migratory route for birds from all over the world, it is hoped the Secretary of State will insist on bird deflectors of the highest quality from the start.

Paragraphs 21 & 22: Dormouse survey methodology and decision to state absence:
It is felt that the data provided is not sufficient to support the 'absence' of Dormouse at Zone D at 14.96. The second edition (Bright, Morris and Mitchell-Jones, 2006) says assumed absence should not be based on a search effort score of less than 20 and as a result, this Zone fails the 2025 handbook, as mentioned by NE, who also state, Zone B had too few tubes, to rely on the data provided! Clearly further surveys are required to better inform an evidence-based decision, the resurveying has started and is due to finish in November 2026. This begs the question, how can a decision by the Secretary of State be made prior to this date?

Paragraph 24: Change wording in documents to refer to "Trenchless Crossings" throughout:
The very real risks of HDD have been mentioned earlier in this document and the NG have updated the wording as requested, but they have also stated that HDD is only viable option as micro tunnelling and direct pipe are not viable without intermediate pits. Once again, it is important to bring to the attention of the Secretary of State, the very real risk of using HDD in this environment. NE are clear and state that HDD failure in Pegwell Bay (a RAMSAR site) will be devastating and cause lasting damage, one can only assume the change to the wording therefore appears to be an attempt to 'mislead' in the light of the warnings from NE.

Paragraph 44: Impacts on Tourism:
The NG makes commitments SE04 and SE05 in their answer to the impact on tourism but this lacks detail of clear actions that they will take to minimise identified negative impacts! In addition, we refer to the East Thanet MP, Polly Billington and Jenny Riddell Carpenter MP speeches in Parliament, they are on record as saying, that the compensatory payment scheme to Thanet and Suffolk residents is derisory and that £2.1 million split between the two areas is clearly a "rounding error" because "We can barely get a spade in the ground for a

playground for £20,000." (source Hansard 30th June 2026 Nationally Significant Infrastructure Projects Westminster Hall debate.) In addition, the following has not been taken seriously:

- The disruption to the Way of St Augustine.
- Only recently has work been underway on the footprint of Caesar's Landing area to the west of the A256. There are also concerns that heavy earth moving equipment and bridges that are being deployed presently in this area, appear to have begun early earthworks and that the application is already decided! This is an area rich in archaeology as Caesar's landing site and any associated finds could be a significant tourist attraction, but the NG appears to be 'hitting it' not with trowels and brushes but great big machines, sadly.
- The transport of gravel and equipment from the Port of Ramsgate lacks assessment, especially when the tunnel is shut on a monthly basis for maintenance and there is no reference to the 6 million Kent County Council have quoted as the amount needed to bring the tunnel up to modern safety standards. Indeed, following a recent incident, the tunnel was shut for an extended period of time, with all traffic rerouted via Military Road, as a narrow route past the harbour and its successful businesses and up out via the town. It is hard to see how an increased risk to pedestrians especially on Military Road can be avoided but this has not been considered.

Paragraph 51: There are legal issues being discussed by KCC Highways and the Applicant:
It is noted at **C1-112** from KCC that the Highway Protective Provisions are still not resolved and it also appears have not been made public on the database. Given concerns about the safety of junctions and new turns for heavy machinery and conflict with other road users, would it not be wise for this to be updated before the Secretary of State makes a final decision on the Sea Link project. The movement of gravel and equipment from the Port of Ramsgate via the tunnel and Military Road also needs greater scrutiny, as mentioned previously as the potential for a serious incident is high.

Paragraph 55: Wording on the control of operational noise:
Requirement 18 seems to suggest a one-off check before operation, with no ongoing monitoring. Again, given the size, scope and impact on the a much protected environment and surrounding communities, it is hard to see how this is adequate and agree with KWT's position that post-commissioning monitoring and remediation is a duty; this would trigger a response if the 34 dB limit is breached at Minster (Works 9B and 11) and Friston (1B).

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