



Date: 6<sup>th</sup> March 2023  
National Grid Electricity Transmission  
Sea Link  
Email: [contact@sealink.nationalgrid.com](mailto:contact@sealink.nationalgrid.com) (by email only)

Dear Sir/Madam,

### **Overarching position**

1. KWT are supportive of actions taken to tackle the climate emergency and we are therefore supportive of the transition to renewable energy. KWT understand the need for additional infrastructure to facilitate this transition to reliance on renewable energy and understand that this is the driving principle behind the Sea Link project. It is however essential that the decarbonising of the energy sector is not at the detriment of biodiversity. It is paramount that the nature and climate crises are tackled in tandem.
2. A complete Cumulative Impact Assessment (CIA) of the Sea Link project needs to be undertaken to evaluate the significance of the impacts, particularly examining the effects from multiple activities if the infrastructure is not sustainable for future developments, requiring duplication (i.e., converter station for Nemo Link cannot be used for the Sea Link project). The CIA should examine:
  - a. The cumulative impacts of cables onshore and the need for a more joined up approach.
  - b. Cumulative impacts of cables coming onshore in Kent, particularly in Sandwich and Pegwell Bay reserve. This assessment should include past cables which have resulted in lasting impacts (i.e. Nemo cable), currently proposed cables (i.e. Sea Link) and the future project pipeline for Kent.
  - c. Examining the sustainability of the project for future infrastructure and new cable links (new cables should ideally be able to use the same converter station).
  - d. Consultation on alternative routes have not been made public. There needs to be evidence showing how the applicant has applied the assessment of alternatives as per the Environment Impact Assessment (EIA) Regulations. For example, it is understood that strategic option LL1, which was an onshore option from Sizewell to Canterbury, was not included within the environmental and socio-economic evaluation stage due to the onshore alternative not passing the technical and cost assessments. While the economic benefits of this scheme have been weighed against the financial costs, they have not assessed the economic costs that arise from damage to the environment. If strategic option LL1 is the least damaging to biodiversity and the environment, it should have been properly weighed against the financial costs and considered in more detail. We strongly urge an environmental and socio-economic evaluation of LL1 to rule the alternative route out completely, whilst factoring in the economic impacts of environmental impacts into all remaining options.
3. Because of cumulative impacts we are supportive of the position presented by Suffolk Wildlife Trust and RSPB:
  - a. Comments from Suffolk WT: *"We support a coordinated strategic approach to planning, design, and construction of new energy infrastructure to reduce the overall negative impacts from schemes on nature and maximise potential for*

*habitat creation and restoration to deliver environmental and social benefits. Currently though, multiple energy infrastructure projects – including National Grid schemes – are putting wildlife on the Suffolk Coast at risk. We need Government, National Grid and Ofgem to work together on a more strategic approach to the planning and delivering new low carbon energy infrastructure that helps us to achieve a ‘nature friendly net zero’. It is disappointing then that the proposals for the Sea Link grid reinforcement scheme do not include any siting and routing options that avoid the potential for significant and long-term adverse impacts on some of the most highly protected and sensitive wildlife and habitats on the Suffolk Coast, including nationally and internationally designated sites and legally protected and priority species of conservation concern. We are asking National Grid Electricity Transmission to revisit the proposals for Sea Link alongside National Grid Ventures interconnector projects, EuroLink and Nautilus, proposing to connect to the onshore grid on this part of the Suffolk Coast to assess how the impacts of these projects on wildlife on land and at sea can be minimised through their location, design, and construction.”*

- b. Comments from RSPB: “We need Government, National Grid and Ofgem to work together to develop a more strategic approach to the planning of onshore energy projects to enable a response to the energy and climate crisis that helps us to achieve a ‘nature friendly net zero’. We therefore request that National Grid Electricity Transmission look again at the current grid reinforcement and interconnector projects and consider how impacts on important wildlife sites can be avoided as far as possible, in line with the mitigation hierarchy. At present, no justification has been provided as to why such impacts have not been avoided, and no detail is provided of any mitigation that might be possible. This has resulted in us having significant ecological concerns, which are discussed in detail below.”*

4. A common theme within our comments is lack of detail from what has been provided by the applicant:

- a. We would expect to see detailed assessments of each trenchless technique and assessments of trenched options. We need assurances that only trenchless techniques will be taken forward, otherwise we’d expect alternative routes to be considered to lessen the detrimental impacts.
- b. Missing ecological survey information / impact assessments. We recommend that a list of ecological surveys is provided to us early, to avoid delays due to absence of data that we need to assess the impacts of at a later date.
- c. Lack of detail around some of the assessment of alternatives, for example it is noted within paragraph 2.2.36 of Sea Link Corridor and Preliminary Routing and Siting Study regarding strategic options SL1, SL2 and SL3 that there are no environmental and socio-economic options that outweigh each other or present an issue that would move away from the most economical technical option being the right solution. However, apart from just saying there are no differences in environmental impact, we need to see the evidence behind this and a clearer justification on the chosen route.
- d. No evidence has been provided to demonstrate that no alternative grid connection options exist that would result in reduced harm to the natural environment.

- e. Lack of detail within the documents to understand avoidance measures – loose terminology around avoidance and no information provided on what the applicant will do if designated sites cannot be avoided. We need assurances that where avoidance of impacts is not possible i.e., through using trenchless techniques, that alternative options that do not result in environmental damage are taken.
- f. Lack of further detail on method of construction / temporary land take / redline boundary.
- g. It is not possible to assess the likely environmental impacts where the proposals are currently based predominantly on assumptions.
- h. No survey schedule has been provided, we need to know what surveys are being undertaken, the techniques used and when, as some surveys i.e., with drones, may impact on breeding birds.

5. KWT's views on the principle of development within a SSSI:

- a. Align with RSPB's comments regarding the lack of strategic planning and the lack of prioritisation of options which minimise impacts on nature and wildlife.
- b. Emphasise need to follow the mitigation hierarchy and explore all least damaging options to designated sites.
- c. On this basis the assessment of alternatives needs greater clarification / assessment. Particularly around Aldington and Broadstairs options.

6. Ecological concerns:

Marine impacts

- a. Avoidance of Margate Long Sands SAC has been stated as probable although it is unclear in what circumstances this wouldn't be possible. There is no evidence of the mitigation hierarchy for Margate Long Sands SAC. The SAC is highly sensitive and supports diverse epifauna such as the Sabellaria reefs a UK BAP habitat; it would be unlikely to recover quickly if damaged. Use of rock armour would cause irreversible habitat damage, which again highlights the need to see National Grid's mitigation hierarchy for Margate Long Sands SAC.
- b. National Grid have identified possible irreversible habitat loss to Goodwin Sands MCZ (which features Sabellaria reefs) if they need to use rock armour. National Grid have failed to mention the mitigation hierarchy to this point, so it is unclear what the options are around Goodwin Sands MCZ as the area is highly mobile.
- c. National Grid has not mentioned the harbour seals at Sandwich and Pegwell Bay. The NNR is a seal haul out location which is used all year round. There has been no consideration for the effects of underwater noise on the seals. Additionally, there has been no consideration for the displacement of prey fish on seals. Regarding noise, it should be considered harbour seals use sound to defend territory underwater during the mating season (VAN PARIJS et al., 1997).
- d. The recovery of the saltmarsh after the cable has been laid is assumed to be good based on the saltmarsh plant recovery from the Nemo Link cable; however, there are still problems with the recovery of the Nemo Link cable route across the saltmarsh. There are extensive areas of bare mud with little plant regeneration, so the saltmarsh

hasn't satisfactorily recovered from the trenching work from Nemo Link. How does National Grid propose the recovery will be good given this?

- e. The invertebrate community in the mudflats and saltmarsh has not been adequately considered. A healthy invertebrate community supports the structure and function of the saltmarsh as well as providing food for many species of importance. National Grid should plan to survey the invertebrate community to better understand how it will respond and recover from the cable.

#### Coastal impacts

- a. From our site meeting on 19<sup>th</sup> January 2023, it is understood that trenchless techniques, such as HDD, is the preferred option, however there are no guarantees that this is possible.
- b. All three terrestrial corridors for Pegwell Bay will impact a number of coastal nature conservation designations. As mentioned within paragraph 8.2.13 of the Sea Link Corridor and Preliminary Routing and Siting Study, even when using HDD techniques there is still the risk of disturbance and breakout of drilling fluids into the River Stour at points where it is designated as a Ramsar, SAC, SPA and SSSI.
- c. We need a detailed list of different options for the cabling, including HDD, micro-tunnelling, and trenching. This should include a detailed assessment of the likely impacts / risks / opportunities for each method, including an Environmental Impact Assessment (EIA). This should be used to inform the preferred method / secondary method / prohibited methods.
- d. Previous environmental damages caused by the Nemo Link needs to be highlighted to understand how to better mitigate the impacts of Sea Link. Not all damages caused by Nemo Link were mitigated for, so we would expect to see improvements in mitigation measures for Sea Link. Likewise, we need to see the evidence that supports the claim that the mudflats have recovered from the environmental damages caused by Nemo Link. Overall, due to the severe failings of the Nemo cable in destroying and failing to restore the saltmarsh, there is a clear precedent that only trenchless options (following a detailed assessment of risks) should be considered.
- e. Disturbance to wildlife, particularly for birds, needs to be assessed in detail, including disturbance caused by any surveys using drones. It is understood that if HDD is used, this will include a construction period of 4 – 6 months and will operate 24/7 to avoid issues with the drill(s). There needs to be a comprehensive understanding on how this will impact and disturb birds and marine mammals.
- f. Birds use Pegwell Bay throughout the year, so we would expect to see data collected not just for breeding and wintering birds. Intertidal, subtidal, and supratidal surveys should be conducted throughout the year (monthly) to understand how birds are using the habitats for foraging and roosting throughout the tidal cycle, as well as species specific surveys for turnstone and golden plover as these are the two named feature species of the Thanet Coast and Sandwich Bay SPA. Nocturnal surveys for golden plover should also be undertaken, as they use farmland at night and therefore there is potential for the species to use the agricultural fields assigned for the terrestrial cable route. We would expect to see strong justification as to why certain ecological surveys are not being undertaken.

## Terrestrial impacts

- a. There is a lack of detail around the chosen terrestrial corridor. From reviewing Sea Link Corridor and Preliminary Routing and Siting Study, the Broadstairs option has far fewer constraints compared to Pegwell Bay. The main constraints for Broadstairs includes disruption to traffic, settlements, and planning (areas allocated for housing), with no mention of environmental constraints, whilst Pegwell Bay lists biological and physical environmental constraints, as well as disruption to traffic, recreation, and tourism.
- b. A detailed EclA of functionally linked land (FLL) at Minster Marshes is needed, as these habitats may support birds for which the SPA is designated. Non-designated land must also be surveyed for birds, as some species move frequently between habitats.
- c. The proposed route for the overhead line and converter site will directly and indirectly impact Sandwich Bay to Hacklinge Marshes SSSI, Ash Level and South Richborough Pasture Local Wildlife Site (LWS) and Woods and Grassland Minster Marshes LWS. An EclA should be provided to understand all direct and indirect impacts, including how much habitat will be directly lost as well as temporary habitat loss for access, works area and work compounds during the construction phase. The future functionality of the converter station and overhead cables also need to be considered, for example what would happen if new cables were constructed and will these be able to use the same converter station and overhead cables. The project should be proactive on the possibility of future projects and think about the cumulative impacts they will have.

If you require any further clarification regarding our comments, please do not hesitate to get in touch.

Kind regards,

**Emma Waller**

Planning and Policy Officer

Kent Wildlife Trust

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Reference:

National Grid (2022) "Sea Link Corridor and Preliminary Routing and Siting Study" Available at: [Document library | National Grid ET](#)

VAN PARIJS, S.O.F.I.E.M. *et al.* (1997) "Distribution and activity of male harbour seals during the mating season," *Animal Behaviour*, 54(1), pp. 35–43. Available at: <https://doi.org/10.1006/anbe.1996.0426>.