

Date: 14th December 2023
National Grid Electricity Transmission
Sea Link Project
Email: contact@sealink.nationalgrid.com (by email only)



Kent
Wildlife Trust

Dear Sir/Madam,

RE: Sea Link Nationally Significant Infrastructure Project (NSIP) Statutory Consultation – Kent Wildlife Trust

SUMMARY

This letter is written in response to reviewing Sea Link's Statutory Consultation Preliminary Environmental Information Report (PEIR). To allow us to complete a comprehensive response to your consultation, please accept our comments in letter format. Kent Wildlife Trust (KWT) have provided previous comments to National Grid in March 2023 after a site meeting on 19th January 2023. During this site meeting, KWT met with National Grid representatives, their ecologists, and other key stakeholders where we discussed some of our concerns and provided advice as key stakeholders / landowners. Below is a list of our main concerns outlined within our previous response and survey prerequisites discussed from the site meeting:

- There needs to be a Cumulative Impact Assessment (CIA), 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)
- Detailed Environmental Impact Assessment (EclA) of each trenchless technique, micro-tunnelling and trenching options to inform the preferred method, secondary method and prohibited methods.
- We requested further evidence that the mitigation hierarchy had been followed – on this basis the assessment of alternatives needs greater clarification, for example the Broadstairs (K1a) option wasn't taken forward due to constraints to existing and proposed residential developments, despite Broadstairs having the fewest environmental constraints. We requested to see more evidence behind the justification on the chosen route and that the mitigation hierarchy has been appropriately followed.
- The project should avoid Margate Long Sands SAC as its highly sensitive and supports diverse epifauna and Annex I habitats.
- National Grid identified possible irreversible habitat loss to Goodwin Sands MCZ if rock armour were to be used. The use of rock armour would result in irreversible habitat damage to UK BAP Priority Habitats such as Sabellaria Reefs, which again highlights the need to see National Grid's mitigation hierarchy.
- As discussed during the site meeting, the saltmarsh hasn't recovered from the impacts of Nemo Link. These negative impacts and failed mitigation should be addressed in the Sea Link documents and be used to inform how National Grid propose more adequate measures to ensure the recovery of the saltmarsh and other impacted habitats.
- All previous environmental damages caused by the Nemo Link needs to be highlighted to understand how to better mitigate the impacts of Sea Link. Likewise, we requested to see the evidence that supports National Grid's claim that the mudflats have recovered from the environmental damages caused by Nemo Link.
- From the site meeting, it was understood that trenchless techniques, such as HDD, is the preferred option, however at the time there were no guarantees that this was possible. If trenchless techniques are used, there are still risks associated with these methods and these needed to be addressed.

- Disturbance to wildlife needs to be assessed in detail. During the site meeting, and outlined within our original response, KWT provided National Grid and their ecologists with the basic, minimum survey effort we would expect to see for Pegwell Bay to enable a detailed assessment of the impacts to ensure appropriate bespoke mitigation can be provided.

Prerequisites included:

- Breeding and wintering bird surveys, as well as monthly intertidal, subtidal and supratidal bird surveys of Pegwell Bay to understand how birds are using the habitats for foraging and roosting throughout the tidal cycle, including species specific turnstone and golden plover surveys as these are the two named feature species of the Thanet Coast and Sandwich Bay SPA. Nocturnal surveys for golden plover should be undertaken, as they use farmland at night and therefore there is potential for the species to use agricultural fields assigned for the terrestrial cable route.
- 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.
- Marine mammal surveys, particularly for seals as the Sandwich to Pegwell Bay National Nature Reserve (NNR) is a seal haul out location which is used all year round. The effects of underwater noise and displacement of prey also needs to be considered.
- Invertebrate surveys of the saltmarsh and mudflats to better understand how it will respond and recover from the impacts. A healthy invertebrate community supports the structure and function of the habitats within the SPA, as well as providing food for many species of importance.
- It is understood that even with HDD, it would include a construction period of several months, therefore there needs to be a comprehensive understanding of how this will impact and disturb all marine life and birds.
- KWT requested early on that a list of the proposed ecological surveys were provided to us, to avoid delays due to absence of data that we need to adequately assess the impacts to our Nature Reserve.

From reviewing the consultation documents, it is disappointing to see that the vast majority of our previous concerns have not been addressed. A meeting between National Grid and KWT was held on 5th December 2023 to discuss these concerns and request further clarity on information provided within the PEIR. Whilst there were some reassurances around the ongoing bird surveys, KWT still have large concerns that at this stage of the Project's timeline, National Grid are unable to fully commit to trenchless techniques. It is also disappointing to learn that the complete survey results, detailed mitigation, and Environmental Statement are intended to not be published for an additional round of consultation and that these will be provided with the Development Consent Order (DCO). It is understood however, that stakeholder meetings will be held in 2024 to discuss some of the omitted information. KWT strongly advise that a further public consultation ahead of the DCO submission is held to allow the public the opportunity to review this information. The purpose of the PEIR is to enable the local community, stakeholders, and government bodies to understand the likely significant environmental effects of an NSIP. The PEIR should present information on significant environmental effects, preliminary survey data and proposed mitigation to avoid and reduce such effects. This is to support consultees in developing an informed view of the Project and provide an assessment of impacts and the appropriateness of the proposed mitigation. Therefore, it is unacceptable that the vast majority of ecological surveys have not been undertaken and therefore no assessment on the likely impacts can be addressed, nor can survey data be used to inform the Project route. Likewise, no detailed mitigation has been presented at this stage and therefore consultees are unable to assess the suitability/validity of the mitigation until it is published within the DCO. Overall, KWT are not confident with National Grid's preliminary assessments and strongly urge

that a more detailed PEIR is submitted once all the survey data has been collected, to adequately inform their proposed route and mitigation. Please note that our comments reflect only of the proposals and impacts to Kent and not of the scheme in its entirety.

ASSESSMENT OF ALTERNATIVES

KWT understand that a range of strategic options and alternative routes have been considered at each stage of the Sea Link development, hereinafter referred to as 'the Project'. In total, six landfall and two converter sites were identified within Kent, with seven terrestrial corridors. The six landfall sites were split geographically across the north Kent coast: four areas between the settlements of Herne Bay and Birchington (K2 – K5), one area between the settlements of Margate and Broadstairs (K1a) and one area between the settlements of Ramsgate and Deal (K1). It is understood from reviewing Volume: 1 Part 1 Introduction Chapter 3 Main Alternatives Considered that the main constraints listed for each landfall route include:

- Routes K2 – K5 would all require the cable to be routed through an area of Flood Zone 2 and 3 and constrained by the Margate and Long Sands SAC
- Route K1a would cross the Thanet Coast and Sandwich Bay designated sites and be constrained by sites allocated for development in the Local Plan and would have to cross through North Foreland Golf Course
- Route K1 in Pegwell Bay would cross the Thanet Coast and Sandwich Bay designated sites, impact Goodwin Sands MCZ and cross through Pegwell Bay NNR, Hacklinge Marshes SSSI and St Augustine's Golf Club

We understand National Grid's preferred landfall option is at Pegwell Bay (K1), despite it having some of the biggest environmental constraints. We note that all alternative routes would impact Thanet Coast and Sandwich Bay SPA/Ramsar to some extent, however missing from the PEIR is the emphasis to avoid, mitigate and compensate negative environmental impacts ('mitigation hierarchy'). Therefore, we request further evidence to convey how the mitigation hierarchy has been followed and to support the rationale for route K1, particularly when National Grid have stated "*the marine approach to landfall area K1a [Broadstairs option] was relatively unconstrained, and it was also considered likely that any impacts to the designated sites for nature conservation would be temporary and short term.*" KWT disagree with the statement that justifies the decision of K1 in paragraph 1.3.5.65 which states "*the appraisal identified that any potential impacts [to designated sites] could be mitigated through careful selection and trenchless techniques.*" At this stage, National Grid have failed to fully commit to trenchless techniques, with the PEIR still using phrases such as "*where feasible*", "*assuming*", "*indicative*" and "*preferred*" when discussing trenchless options, with paragraph 6.2.25 of the Non-Statutory Consultation Response report stating "*open cut is the preferred method of cable installation, but where there are sensitive receptors, that can't be avoided, National Grid will consider alternative trenchless installation techniques.*" It is also extremely discouraging that National Grid do not plan to mitigate against the direct loss and disturbance to Goodwin Sands MCZ, benthic Habitats of Principle Importance and Annex I habitats, as stated within Volume: 1 Part 4 Chapter 3 Benthic Ecology "*no additional mitigation measures have been identified to mitigate impacts on benthic ecology, as none are considered necessary beyond the embedded, control and management measures.*" Likewise, the ecological survey effort we requested for Pegwell Bay during early discussions with National Grid have not been undertaken. Therefore, we cannot see how route K1 has been adequately assessed or how it can be sufficiently mitigated for, particularly when the previous Nemo Link caused considerable environmental damage to the saltmarsh and mudflats within Pegwell Bay NNR. It is noted within paragraph 1.3.3.1 of Volume: 1 Part 1 Introduction Chapter 3 Main Alternatives Considered that "*they [alternatives] will continue to be considered in the development of the Proposed Project for which an application for development consent will be made to the Secretary of State*" and that feedback from this Statutory Consultation will "*be used to refine the proposals*". We therefore urge National Grid to reconsider their strategic alternative routes. The current proposed route cannot be adequately mitigated and therefore

contradicts National Grid's rationale for the route. We wish to reaffirm that mitigation should be considered after avoidance measures, inline with the mitigation hierarchy. Currently there is not enough evidence that adequate avoidance measures have been made.

CUMULATIVE IMPACTS

KWT previously requested a Cumulative Impact Assessment (CIA). It is understood from reviewing paragraph 1.5.9.4 of Volume: 1 Part 1 Introduction Chapter 5 PEIR Approach and Methodology that *"a description of the likely significant intra-project cumulative effects will be provided within the ES and a preliminary assessment is provided within this PEIR"*. Therefore, at this stage we are unable to provide a detailed assessment on the cumulative impacts. However, it has been noted within Volume: 1 Part 3 Kent Onshore Scheme Chapter 13 Kent Onshore Scheme Intra-Project Cumulative Effects that the preliminary assessment has identified that cumulative impacts on ecological receptors *"was judged to potentially be significant"*, specifically relating to the loss of functionally linked land (FLL) and habitats for birds. From reviewing the documents, it is not clear as to whether the impacts from Nemo Link have been considered within the cumulative impacts. The Preliminary Assessment states that there will likely be no significant impacts to designated sites. KWT disagree with this statement as the Nemo cable caused irreversible damage to habitats within protected and designated sites. As stated within our previous response, we expect National Grid to recognise the damages caused by Nemo Link and provide a detailed assessment to ensure improvements are made.

It is noted within the Project Overview document that infrastructure for Sea Link in Suffolk is viable for up to two other projects (Nautilus and Lion Link). However, paragraph 1.5.7.24 of the PEIR Approach and Methodology report states *"Unlike the proposals in Suffolk, there are no separate projects that require a coordinated approach with the Proposed Project in Kent."* KWT urge that more clarification is needed in what will happen if National Grid want to include more cables in the future – would additional infrastructure be required? Likewise, as stated within our previous response, we requested more information as to why Nemo and Sea Link were not coordinated to use the same infrastructure. If it was assumed at the time of Nemo Link that no future projects were proposed, then we need more reassurance that there will be no future projects that would require the duplication of infrastructure and impact the same habitats again. Infrastructure for renewable energy should be sustainably designed and facilitate future projects. If the infrastructure in Suffolk is being designed to be viable with additional projects, then we urge National Grid to reexamine the Kent onshore scheme.

ECOLOGY AND BIODIVERSITY

Marine Impacts

One of our survey prerequisites to National Grid and their ecologists during the site visit, and highlighted within our original response, was the need for marine mammal surveys, particularly for seals as the Sandwich to Pegwell Bay NNR is a seal haul-out location, supporting Kent's largest seal population which use the NNR all year round to rest, moult and breed. Therefore, it is extremely disappointing to see that *"baseline conditions were established by undertaking a desktop review of published and publicly available information and through consultation with relevant organisations."* It should be made evident who these "relevant organisations" are and what datasets were used as to our knowledge marine mammals in Kent are understudied and therefore, we would like to know how National Grid quantified their data. Since our meeting with National Grid on 5th December 2023 they have provided us with links to studies used for assessing the likely impacts on seals, however the links to these studies do not work and therefore we are unable to review them. From reviewing Image 4.5.2 and Image 4.5.4 within Chapter 5 Marine Mammals report, which display the harbour

and grey seal population counts, we note that this data is referenced from studies undertaken by Zoological Society of London (ZSL) in 2014 and 2015 and therefore are significantly out of date. We strongly disagree with the statement *“No marine mammal field surveys were undertaken as the information collected through the desktop review was considered sufficient for an assessment of the project activities.”* As highlighted directly to National Grid during the site meeting and within our previous response, we made our concerns regarding impacts to the known seal population at Pegwell Bay very clear, and that surveys needed to be undertaken to understand how the seal population use the NNR to prevent disturbances to the colony, including impacts to prey availability and the sand banks the colony uses for hauling-out. We are not convinced that National Grid have provided sufficient evidence to support their assessment of impacts to marine mammals.

Regarding Margate and Long Sands SAC, more clarification is needed as to whether Annex I habitat ‘sandbanks which are slightly covered by sea water all the time’ are being directly impacted. We note that this habitat is within the Offshore Scheme, however from our understanding, these habitats fall outside of the Margate and Long Sands SAC with National Grid stating, *“it is not specifically protected under any designated site.”* National Grid have stated that *“rock placement is not being considered in any areas of designated Annex I habitat”* despite confirming Annex I habitat ‘sandbanks which are slightly covered by sea water all the time’ being present. The scheme should avoid all Annex I habitats, regardless as to whether these habitats are within, or fall out of the Margate and Long Sands SAC. To quantify the cumulative impact from offshore development this kind of information is important to track change of the seabed and to properly assess the impacts.

KWT are extremely concerned regarding the lack of mitigation to benthic habitats, despite the Offshore Scheme passing through marine designations. In regards to Goodwin Sands MCZ, it is noted within Volume: 1 Part 4 Offshore Scheme Chapter 3 Benthic Ecology that *“[...] the only feature of this designated site [Goodwin Sands] identified within the Offshore Scheme was ‘subtidal sands’. This habitat is considered to be of medium value and grab samples from within the MCZ were found to have sparse fauna. Sandy habitats such as this are dynamic as they are frequently exposed to significant wave and tidal energy. Considering the low biodiversity, this habitat is considered to have high capacity to tolerate physical disturbance and so has a low sensitivity to temporary disturbance.”* Marine habitats move naturally with the tide and current; however, this does not justify National Grid’s assessment that they can tolerate physical disturbance. More information is needed on the level of disturbance, if this involves moving sediments which will directly impact soft sand banks which are exposed and vital for seals and birds, then KWT strongly disagree with National Grid’s assessment of Goodwin Sands MCZ. KWT also disagree with the statement that ‘subtidal sands’ have low biodiversity as sand/mud benthos are extremely important for burrowing invertebrates. Goodwin Sands MCZ is designated for the protection of Sabellaria Reefs, which are a UK BAP Priority Habitat. Within the MCZ, Kent and Essex Inshore Fisheries and Conservation Authorities (KEIFCA) have identified Sabellaria Reefs, blue mussel beds, soft corals, pink sea fans, cup corals and sponges, including a wide range of predatory fish which use the sandbanks for spawning, such as the thornback ray which use them as a nursery ground. Therefore, if the benthic ecological surveys have identified marine sites to be low in biodiversity, then there is the question around cumulative impacts from other offshore developments, such as Nemo Link. The Project will also result in the loss of NERC Habitats of Principle Importance ‘communities on circalittoral rock’ and ‘subtidal sand and gravels’. National Grid have identified these sites as having high biodiversity and supporting communities that are likely to be more vulnerable to physical disturbance. However, it is stated within the Benthic Ecology report that these habitats are widespread in the region of the North Sea and therefore *“are of low importance, and so are considered to have low sensitivity to direct loss.”* KWT strongly disagree with this statement as the majority of infauna in muds and sediments are invertebrates at the base of the food web and should be considered in more detail regarding cumulative impacts. The routing of the cable should avoid direct impacts to these important areas

and scheduling works should avoid important spawning times. Overall, we would expect National Grid to mitigate against the negative impacts the Offshore Scheme will cause in the same way they are proposing to mitigate against impacts to terrestrial habitats. MCZs have the same level of protection as SSSIs and therefore we would expect the same level of effort made to avoid these habitats and as a last resort, provide adequate bespoke mitigation and compensation measures.

Coastal Impacts

KWT's main concerns regarding the Project's coastal impacts are the disturbance to wildlife, particularly for birds and previous environmental damages caused by Nemo Link. As previously stated, not all damages caused by Nemo were mitigated or compensated, which is why during the site meeting and our previous response we requested a detailed CIA to assess these impacts so improvements to Sea Link could be made. The main environmental damages caused by Nemo were the trenching methods to install the cables. It is understood that National Grid plan to use trenchless techniques such as HDD for Sea Link, however we are not convinced that there is enough evidence to support these claims. Within Appendix 1.4.F Outline Schedule of Environmental Commitments and Mitigation Measures it states, "*at the Kent Landfall, the preferred installation method is a trenchless technique that will drill beneath the ground surface to avoid the need to trench the cables through the saltmarsh.*" We wish to remind National Grid that they previously "committed" to trenchless techniques for the Nemo cables, however used open-cut trenching across the saltmarsh instead, damaging the bank at the back of the lagoon which was never restored. This has changed the flow of water throughout the area, altering the vegetation structure and integrity of the saltmarsh. KWT need more reassurance that National Grid can commit to trenchless techniques. If trenchless methods cannot be used, it is essential that National Grid review their alternative routes again, as the rationale for choosing route K1 was that trenchless techniques could be used. We also note that open-cut trenching is proposed along ditches and watercourses. Commitments to using trenchless techniques should include all sensitive ecological areas and not be restricted to designated sites. The impacts using trenchless techniques also need to be addressed, such as breakout of drilling fluids, noise and vibrations. We would still expect to see measures made to mitigate against these risks and impacts. Overall, we feel the commitments made within the Outline Schedule of Environmental Commitments and Mitigation Measures fall short on ensuring designated sites and important ecological habitats are protected.

We understand that some ecological surveys such as breeding, wintering and intertidal surveys for birds have been undertaken during the 2022 – 2023 seasons. We note that during these surveys, dunlin and sanderling were recorded in large numbers and peak counts for both species exceeded the 1% Great Britain national thresholds. Ringed plover, turnstone and red-throated diver were recorded in much smaller numbers than the original SPA/Ramsar counts, however are comparable to the latest Pegwell Bay BTO Wetland Bird Survey (WeBS) data. From the data collected, we would expect to see maps showing the locations and movements of species to understand how they use Pegwell Bay NNR. Currently, no survey data maps/plans have been provided within the PEIR, therefore it is difficult to gauge what areas of the NNR are most important and should be protected from direct impacts. It is noted that in the preliminary assessment of cumulative impacts, that ecological receptors, particularly relating to loss of habitat and disturbance to birds, would be significant. However, detailed mitigation has not yet been provided and therefore we cannot assess these impacts and proposed mitigation in detail. We are also concerned over the lack of information and survey effort regarding the invertebrates within the mudflats. As stated within our previous response, a healthy invertebrate community supports the structure and function of the habitats within the SPA, as well as providing food for many species of importance. We strongly urge that invertebrate surveys of the coastal habitats are undertaken to assess the cumulative impacts this will have on wildlife and the SPA. Other coastal impacts we are concerned about are the impacts to the seal colony which uses Pegwell Bay NNR throughout the year. These concerns have been highlighted

above. Overall, due to the lack of sufficient information we are unable to provide a detailed assessment on the impacts to coastal habitats.

Terrestrial Impacts

The proposed terrestrial corridor route for the overhead cables and converter and substation will directly impact Sandwich Bay and Hacklinge Marshes SSSI, Ash Level and South Richborough Pasture Local Wildlife Site (LWS) and Woods and Grassland Minster Marshes LWS. These direct impacts include loss of 13.6ha of FLL within Minster Marshes, loss of habitats of regional importance (hedgerow, broadleaved woodland, ditches), loss of scrub habitat of local importance, loss of Priority Habitats and land drainage. In our previous response we requested an EclA to understand all direct and indirect impacts to the terrestrial habitats. However, only a preliminary assessment has been made, which highlights significant risks to the River Stour, Minster Stream, lowland mixed broadleaved woodland and hedgerows. From reviewing Appendix 1.4.F Outline Schedule of Environmental Commitments and Mitigation Measures we note that commitment to some mitigation measures have been outlined such as:

- Maintaining a suitable buffer between the converter and substation with Sandwich Bay to Hacklinge Marshes SSSI
- Ensuring the haul route is located beyond the root protection zone of the SSSI boundary
- Install noise and visual disturbance screening measures
- Remove hedgerows in sections, retaining intact root balls where possible
- Deliver at least 10% biodiversity net gain (BNG)

It is understood that these proposed measures will be secured through the Construction Environment Management Plan (CEMP) which will be submitted as part of the DCO. At this stage, there is not enough information to fully review the impacts and proposed mitigation and therefore we urge that a detailed EclA is provided before the submission of the DCO.

One of our main concerns is the direct loss of 13.6ha of FLL for the Thanet Coast and Sandwich Bay SPA/Ramsar. It has been identified within the PEIR that a flock of 700 golden plover were recorded during a survey within the agricultural field the converter and substations are proposed to be built. This number of golden plover equates to more than 1% of both the SPA population and the BTO WeBS counts. It is understood that National Grid plan to “offset” this loss of FLL by converting arable land along the river corridor and enhancing the Lower Stour Wetlands Biodiversity Opportunity Area (BOA). At this stage, is it unknown on the specific location and details of the proposed mitigation/compensation site and therefore we cannot comment on its suitability. The proposed enhancement of the Lower Stour Wetlands BOA is also being considered to comply with Biodiversity Net Gain (BNG). KWT welcome the inclusion of BNG, however we wish to point out that any legislative mitigation, such as mitigation for designated sites and protected species, cannot provide net gain, as they can only be considered as providing no net loss. Whilst enhancements to the Lower Stour Wetlands BOA has the potential for improving BNG, we remain unconvinced that sufficient evidence has been provided to demonstrate that it would provide adequate mitigation and compensation for the loss of FLL and therefore risks the integrity of Thanet Coast and Sandwich Bay SPA/Ramsar. We urge that a detailed EclA of FLL is provided before the DCO stage, so consultees have the opportunity to review and assess the impacts and mitigation/compensation.

From reviewing the consultation documents, it is disappointing that the vast majority of ecological surveys have not been undertaken. Reptile, bat, water vole, otter, beaver, badger, terrestrial invertebrates and river aquatic surveys have “*not yet been commenced*”. It is concerning that National Grid’s timeline for the Project includes submitting the DCO in Autumn 2024, which means that only one survey season of data will be available to make an assessment, which for a project at this scale is insufficient. Surveys that we would expect to be undertaken also don’t seem to be proposed, such as vantage point bird surveys at the locations of the proposed overhead cables. The overhead cable route is suitable for a variety of birds such as birds of prey, heron, swans, geese and

white stork, which would be at risk to bird strikes. We understand that bird strikes have occurred after the installation of overhead cables for Nemo Link, despite these cables being installed with “bird deterrents”. It is noted within the PEIR regarding bird collision risk that *“impact assessment is ongoing, but standard mitigation is available that would reduce impact.”* Taking into account the knowledge of bird strikes even with “bird deterrents” on the existing overhead cables, KWT are not convinced that this can be adequately mitigated, especially due to the lack of survey effort to identify the flight paths of bird species.

Overall, due to the lack of sufficient ecological survey information and detailed mitigation included within the PEIR, KWT are unable to provide a suitable assessment of the environmental impacts or validity of proposed mitigation measures. In our view, National Grid have submitted the PEIR prematurely before completion of the appropriate ecological surveys, which are fundamental for underpinning the mitigation, and before National Grid can commit to trenchless techniques, which is the essential component of National Grid’s rationale for the chosen landfall route. We strongly encourage that the PEIR is resubmitted for public consultation once all ecological surveys, impact assessments and detailed mitigation can be provided and once National Grid can affirm trenchless techniques at Pegwell Bay NNR and other ecological sensitive habitats. KWT are supportive of actions to tackle the climate emergency and the transition to renewable energy, however it is essential that the decarbonising of the energy sector is not at the detriment of wildlife and that the climate and biodiversity crises should be tackled in tandem. KWT strongly urge for National Grid to reconsider the route of the Sea Link project.

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

Kind regards,

Emma Waller

Planning & Policy Officer

Kent Wildlife Trust

emma.waller@kentwildlife.org.uk



Kent
Wildlife Trust