



Kent
Wildlife Trust

Date: 2nd January 2025
National Grid Electricity Transmission
Sea Link Project
Email: contact@sealink.nationalgrid.com (by email only)

Dear Sir/Madam,

RE: Sea Link Nationally Significant Infrastructure Project (NSIP) November 2024 Consultation – Kent Wildlife Trust

SUMMARY

Kent Wildlife Trust (KWT) welcomes the opportunity to respond to the latest consultation regarding the Sea Link project. We recognise the urgent need for renewable energy infrastructure to mitigate the impacts of climate change. However, such developments must be planned and implemented with careful consideration of their environmental implications. It is vital that infrastructure projects do not jeopardise the UK's commitment to halt biodiversity loss and support nature recovery, as outlined in the Environment Act 2021.

This letter addresses the amendments outlined in the Sea Link pre-submission engagement documents (November 2024), particularly the relocation of the proposed mitigation site to an area west of the A256. KWT raises significant concerns regarding the suitability of this new location and its ability to deliver meaningful ecological benefits whilst minimising harm to wildlife.

RELOCATION OF THE MITIGATION SITE

KWT is particularly concerned about the relocation of the mitigation site to an area immediately west of the A256 and near Discovery Park. This site presents several challenges that undermine its potential to function effectively as mitigation and compensation for the loss of functionally linked land (FLL) at Minster Marshes. One of the primary issues is the location's proximity to the A256, a busy road that generates considerable noise pollution. Noise disturbance is a well-documented stressor for many bird species, particularly those that are sensitive to human activity. For species such as golden plover and lapwing, which are identified as target species for mitigation, the constant noise from road traffic is likely to deter them from using the site for foraging or roosting. Additionally, the site's proximity to Discover Park raises concerns about artificial lighting. Light pollution from nearby industrial areas could disrupt the nocturnal foraging and roosting behaviours of golden plover.

This makes the chosen site poorly suited for achieving the stated ecological objectives. Furthermore, KWT questions whether adequate ecological baseline assessments have been conducted for this proposed mitigation site. The mitigation currently proposes adapting existing farming practices to benefit important bird species, but there is little evidence provided to demonstrate that the location can meet these objectives given the significant human disturbances in the area. Without robust baseline data, the suitability of the site for mitigation cannot be confidently established. The mitigation hierarchy, which prioritises avoidance over compensation, must guide the decision-making process. Currently, it seems that National Grid are randomly selecting fields to be used as mitigation sites, with little justification and baseline information. We call on National Grid to provide transparent evidence of the alternatives considered and the ecological reasoning behind the selection of this specific location.

ASSESSMENT OF ALTERNATIVES AND CUMULATIVE IMPACTS

The relocation of the mitigation site also raises broader concerns about whether alternative options have been adequately assessed. We have significant concerns about the approach taken by National Grid in selecting the proposed mitigation site west of the A256. To compensate for the loss of FLL to the Thanet Coast and Sandwich Bay Special Protection Area (SPA), it is essential that National Grid identify and assess multiple potential mitigation sites through a structured evidence-based process. This should include comprehensive baseline ecological surveys at each potential site to determine their suitability for delivering effective ecological outcomes. At present, the selection of the proposed mitigation site west of the A256 appears arbitrary, with no clear ecological justification provided. Selecting fields without proper assessment does not reflect a thorough or evidence-based process and undermines the credibility of the mitigation.

Additionally, the cumulative impacts of the Sea Link project must be considered in conjunction with other proposed developments in the region. Notably, there is a proposed 83ha solar farm approximately 400m south-west of the new mitigation site for Sea Link. This solar farm will also result in the loss of FLL to the Thanet Coast and Sandwich Bay SPA. This overlap in habitat loss creates competition for resources among the bird species that depend on these areas. The ecological pressures from multiple developments in the same area could exacerbate the impacts on biodiversity and significantly diminish the effectiveness of the proposed mitigation measures. National Grid must ensure that its mitigation strategy takes these cumulative impacts into account and works in tandem with other developments to avoid further strain on local ecosystems.

Overall, the current proposed mitigation, sandwiched between the A256, industrial estates and a new 83ha solar farm, does not appear to be a well-thought-out process. The location of the mitigation site seems to have been chosen without sufficient consideration of ecological data or the broader context of environmental pressures. KWT strongly recommends that National Grid re-evaluates its approach to site selection, ensuring that the process is transparent, evidence-driven and aligned with best practices for ecological mitigation and the mitigation hierarchy. KWT firmly maintains that the proposed location for the converter and substations at Minster Marshes is unsuitable. If adequate and effective compensation for the loss of FLL cannot be achieved, National Grid must seriously reconsider and explore alternative locations for the converter and substations.

CONCERNS REGARDING THE HOVER PORT

KWT is pleased to note that the Hover Port is no longer being proposed as a site compound. However, we remain concerned about its continued use as an access route for the project. The use of the Hover Port for access is likely to require vegetation removal, which would result in the loss of important and protected flora and fauna that contribute to the ecological richness of the area. Species such as lizard and man orchid, as well as habitats supporting the rare and fully protected Sussex emerald and fiery clearwing moths, along with notable species such as bright wave and restharrow moths, are at significant risk. These species rely on the unique habitats found at the Hover Port, and their loss would represent a considerable environmental impact.

We strongly urge National Grid to reconsider the use of the Hover Port as an access route and to explore alternative options that avoid vegetation clearance and minimise ecological harm. If National Grid continue to advance with the Hover Port, robust mitigation, compensation and monitoring plans must be implemented to protect these species and their habitats, with evidence to convey how the mitigation hierarchy has been followed.

Overall, our concerns from our previous consultation responses still stands. Pegwell Bay is one of the most environmentally damaging landfall options, whilst Minster Marshes is an unsuitable location for the converter and substations, with both sites facing numerous environmental constraints. National Grid's

decision to proceed with Pegwell Bay contradicts the fundamental principle of avoiding significant harm to sensitive habitats and designated sites, raising serious questions about their commitment to minimising environmental damage and protecting ecologically sensitive areas. By proceeding with a more harmful option when less environmentally damaging alternatives are available, National Grid is not adhering to the first step of the mitigation hierarchy, which is to avoid impacts altogether wherever possible. This oversight undermines the integrity of environmental protection measures and raises serious concerns about the commitment to sustainable and responsible decision-making.

While KWT supports the development of renewable energy infrastructure, it is imperative that such projects are planned and implemented in a manner that prioritises the protection and enhancement of biodiversity. From reviewing National Grid's Preliminary Environmental Information Reports (PEIR) in December 2023, the additional information submitted as part of the July – August 2024 consultation and this November 2024 targeted consultation, we are seriously concerned about the piecemeal approach National Grid has taken with regards to route options, site selections, and mitigation planning. This fragmented approach lacks the cohesion necessary to address the interconnected challenges we face. Overall, there appears to be an absence of a well-integrated strategy that simultaneously delivers on our net zero targets and halts the decline in biodiversity. We urge National Grid to adopt a more comprehensive and strategic approach to ensure that renewable energy developments contribute not only to decarbonisation but also to the protection and enhancement of the natural environment upon which we all depend.

Additionally, we would like to address the Nautilus Link project, another National Grid energy infrastructure project, which has recently been relocated from Suffolk to the Isle of Grain in Kent. The decision to move the Nautilus project presents an opportunity for National Grid to explore a coordinated approach to infrastructure planning. We strongly urge that a feasibility assessment is undertaken to determine whether Sea Link could also be relocated to the Isle of Grain to share infrastructure with Nautilus, similar to the original approach taken on the Suffolk side. While there will still be environmental constraints at the Isle of Grain, if a feasibility study reveals that this location would cause less environmental damage, it should be considered as an alternative option. Green energy infrastructure must be delivered through a coordinated and strategic approach to minimise environmental harm while meeting renewable energy goals. National Grid has the opportunity to demonstrate leadership in this regard by integrating its projects wherever possible to reduce their collective impact on sensitive habitats and species.

KWT maintains that Sea Link, along with other energy infrastructure projects, should positively and significantly contribute to the UK Government's goals of halting and reversing biodiversity loss and establishing a national Nature Recovery Network in England to achieve the 30 by 30 targets. KWT continues to urge 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



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