

Sarah Holmes
Lead Member of the Examining Authority
Sea Link DCO
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

29th August 2025

By email only

Dear Ms Holmes

Re: Application by National Grid Electricity Transmission (the Applicant) for an Order granting Development Consent for the Sea Link Project EN020026

We note NGET's Application for the Sea Link project has been accepted and that the Pre-examination phase is currently underway. Like others (e.g. Kent Wildlife Trust), we are concerned that critical environmental information is missing or inadequate and that this must be rectified before the Examination starts.

For example we are very concerned the Application information provided is not sufficient to fully and robustly assess all potential impacts of the proposed development on affected designated conservation sites and their habitats and species¹ as well as biodiversity in the surrounding area more generally.

We are particularly concerned that the evidence around feasibility of trenchless techniques and details of ecological mitigation for any incidents arising from a failure of such techniques is lacking for both the Suffolk and Kent landfalls. It is

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First Floor One Cornwall Street Birmingham B3 2DX





The RSPB is part of BirdLife International, a network of passionate organisations, working together to save nature across the world.

¹ Specifically, the Leiston-Aldeburgh SSSI, Sandwich Bay to Hacklinge Marshes SSSI, Sandlings SPA, Minsmere-Walberswick SPA and Ramsar, Alde-Ore Estuary SPA and Ramsar site, Thanet Coast and Sandwich Bay SPA and Ramsar site, Sandwich Bay SAC and Outer Thames Estuary SPA

therefore not possible to fully assess all potential impacts on designated sites and their species or to have any confidence in the justifications given for route selection, namely that such techniques would "avoid" impacts on these sites.

We value the NSIP system being front-loaded, to try and ensure such issues as inadequate environmental information are resolved during the Pre-application process, and only unresolved issues need to be fully addressed in the Application documents. Our experience of NSIP Examinations indicates that leaving resolution of key environmental impact assessment issues to the Examination period can make the process difficult for all parties and often leads to delays and disruptions that the process was designed to avoid.

This is especially true if new information is submitted during the Examination resulting in unacceptable time pressure being placed on Interested Parties during what is anticipated to be a challenging timetable. Given the complexity of this Application, this is a serious concern to the RSPB.

We are therefore grateful for the approach the Examining Authority have taken so far during the Pre-examination phase to address some of the gaps in the Application documents; however, we respectfully request that the Application is further considered to ensure that <u>all</u> the necessary information and evidence required to inform the environmental assessments is included before an Examination commences.

Yours sincerely



Jacqui Miller

RSPB Senior Conservation Officer, Suffolk

The Royal Society for Protection of Birds (Registration: F5280E651)

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