

## Pegwell & District Association Submission to the Planning Inspectorate on Sea Link (Kent)

### Summary

Pegwell & District Association (P&DA) registers its strong and unequivocal objection to National Grid's proposals to site the Sea Link landfall at Pegwell Bay and construct a large converter station across Minster Marshes.

These proposals would inflict permanent, irreparable damage on some of the most environmentally sensitive, legally protected and culturally significant landscapes in Kent. The project, as currently designed, fails to comply with national planning policy, international wildlife obligations, or basic principles of sustainable infrastructure planning particularly given the existence of less damaging, technically feasible alternatives.

P&DA urges the Planning Inspectorate to refuse or require substantial redesign of the current proposals.

### About the Pegwell & District Association

Pegwell & District Association is a long-established community charity representing residents and stakeholders across Pegwell, Cliffsend, Minster, and wider Thanet.

We work to protect the environmental, heritage and social value of Pegwell Bay and its surrounding landscapes. Over many decades we have:

- contributed to local planning and environmental inquiries;

- worked in partnership with conservation bodies, including Sandwich Bay Bird Observatory Trust (SBBOT);

- gathered and maintained extensive local ecological knowledge;

- monitored long-term changes in Pegwell Bay, Minster Marshes, the former Hoverport, and surrounding farmland.

Our proximity, field knowledge and decades of community engagement place us in a uniquely authoritative position to report on the risks, impacts and unsuitability of the Sea Link proposals.

### Key Objections

#### 1. Impacts on Legally Protected and Irreplaceable Sites

Pegwell Bay carries multiple statutory designations, including:

- Site of Special Scientific Interest (SSSI)

- Special Protection Area (SPA)

- Ramsar site

- Special Area of Conservation (SAC)

- National Nature Reserve (NNR)

These overlapping protections demonstrate the exceptional ecological sensitivity and national importance of the site.

The converter station and landfall proposals risk breaching legal obligations under the Conservation of Habitats and Species Regulations. Of particular concern is the loss and disturbance of functionally linked land areas outside the SPA boundary that are nevertheless essential for feeding, roosting and movement of protected bird species.

The community has repeatedly observed large flocks of waders, overwintering birds, raptors and seed-eaters making daily use of Minster Marshes. Any permanent loss or fragmentation of this habitat would be ecologically unacceptable and legally questionable.

#### 2. Poorly Scoped and Insufficient Ecological Surveying

P&DA notes with concern that National Grid's ecological assessments:

- underestimate the ecological value of Minster Marshes by describing them simply as "arable fields";

- rely predominantly on monthly WeBS data, which is unsuitable for capturing daily variability, disturbance patterns, or key migration periods;

- did not incorporate long-term local datasets offered by experts such as SBBOT.

Local knowledge clearly contradicts the developer's characterisation of the land. Minster Marshes act as a vital ecological corridor linking Pegwell Bay to inland marshes, providing foraging sites, high tide roosts and commuting routes for SPA bird species.

It is unsound to progress a Nationally Significant Infrastructure Project on the basis of partial and inadequate ecological evidence.

#### 3. Flood Risk, Hydrology and Climate Resilience

The proposed converter station footprint lies in low-lying marshland with documented flood vulnerability. Under UKCP climate projections, sea levels around Pegwell Bay are expected to rise significantly by mid-century, increasing the risk of tidal and hydrological flooding.

Placing a large, heavy industrial facility on waterlogged ground could alter groundwater dynamics, potentially:

- forcing water into ditches and drainage channels;

- affecting flows into Pegwell Bay and the River Stour;

- damaging mudflats used by waders and affecting the seal colony.

Such risks are inconsistent with the National Policy Statement for Energy (EN-5), which requires robust consideration of flood risk, future climate conditions, and long-term resilience.

#### 4. Risks to Protected Species and Collision Hazards

The proposed new pylon structures and overhead lines introduce significant collision risks particularly in the River Stour corridor, a well-known flight path for mute swans, wildfowl and migratory birds.

Historic examples near Sturry show that overhead infrastructure in foggy, low-visibility valleys can cause substantial avian mortality.

The former Hoverport now a de facto rewilded site contains rare invertebrates, plant species and bird populations. Heavy machinery, increased traffic, and construction disturbance would devastate this fragile and recovering ecosystem.

#### 5. Precedent of Past Damage at Pegwell Bay

The community remains deeply concerned by the legacy of the Nemo Link construction. Despite assurances of reinstatement, saltmarsh damage has proven long-lasting.

This history significantly undermines public confidence in promises of "temporary" impacts or "full restoration".

#### 6. Inadequate Mitigation and Compensation

National Grid's proposed "offset land", located several miles away and lacking connectivity to Pegwell Bay's ecological network, is not equivalent in ecological function.

It is not marshland, is surrounded by industrial land, and cannot substitute for the complex wetland and intertidal dynamics of Minster Marshes.

This approach fails to meet the requirements of EN-1 (5.11.25) for compensation that is truly comparable in value, function, and connectivity.

#### 7. Alternatives Have Not Been Properly Considered

Multiple stakeholders, residents, conservation bodies, local authorities—have urged National Grid to consider:

brownfield alternatives (e.g., Isle of Grain, Kingsnorth);

routing adjustments (e.g., SL1 route near Sellindge);

locations with significantly lower ecological sensitivity.

Evidence suggests that cost-saving considerations were prioritised over environmental responsibility, which is inconsistent with both the spirit and letter of UK planning policy.

#### 8. Consultation Deficits and Lack of Procedural Fairness

Many local organisations, including P&DA, submitted detailed concerns during earlier consultations. These concerns do not appear to have been meaningfully reflected in the documents now submitted.

This raises legitimate questions about:

whether the consultation was inclusive;

whether National Grid fully engaged with expert stakeholders;

whether procedural obligations under the NSIP regime were satisfied.

#### Recommendations to the Planning Inspectorate

##### 1. Reject or Refuse the Converter Station on Minster Marshes

The site is fundamentally inappropriate due to ecological sensitivity, legal constraints, and extreme flood risk.

##### 2. Require a Full Independent Ecological Reassessment

This must incorporate long-term local datasets held by P&DA, SBBOT and other experts.

##### 3. Demand a Revised Habitats Regulations Assessment (HRA)

The current HRA does not adequately assess functionally linked land, cumulative impacts, seasonal use, or hydrological risk.

##### 4. Require Proper Consideration of Alternative Sites

National Grid must demonstrate that less damaging options were evaluated fully and fairly.

##### 5. Strengthen Mitigation and Compensation Requirements

Any unavoidable impacts must be offset by habitat of equivalent ecological function, proximity and hydrological character—not distant, disconnected fields.

##### 6. Ensure Robust Public Participation

Local charities, conservation bodies and resident groups must be treated as full Interested Parties, with all evidence formally considered.

#### Conclusion

The Pegwell & District Association urges the Planning Inspectorate to recognise these proposals as ecologically unsound, legally problematic, and strategically flawed. The Pegwell Bay and Minster Marshes landscape is one of Kent's most irreplaceable natural assets protected in law, cherished by residents, and central to the region's ecological identity.

Given the clear deficiencies in survey evidence, the significant hydrological and climate risks, the unacceptable impacts on internationally designated habitats, and the availability of less damaging alternatives, we respectfully request that the application be refused or fundamentally redesigned.