



The countryside charity
Kent

Sea Link Nationally Significant Infrastructure Project (NSIP) Application

Planning Inspectorate Reference: EN020026

CPRE Kent [REDACTED] - Open Floor Hearing 11th November - Oral statement

We are CPRE Kent: the Kent branch of the Campaign to Protect Rural England.

We continue to strongly oppose the Sea Link proposal for several reasons. While this is not an exhaustive list, I will briefly highlight the following.

Failure to consider reasonable alternatives and failure to comply with Mitigation Hierarchy, and ecological and landscape impacts.

Failure to consider reasonable alternatives: CPRE Kent appreciate the need to transition to a sustainable, low-carbon energy system. However, it is crucial that this process prioritises the best overall net-zero solutions for the countryside, not merely those that are quickest or most economically convenient.

The project has a scattergun approach at best and does not appear to be in-line with any current overarching strategic energy plan. We remain extremely concerned that accelerated-delivery approaches and energy-infrastructure projects outside of strategic planning further risk and will have irreversible impacts on the countryside's landscape and ecological assets. New energy infrastructure must be progressed thoughtfully and in a comprehensively joined-up manner. By pushing ahead now, National Grid clearly disagrees.

Under the Infrastructure Planning Regs, an Environmental Statement must include a description of the reasonable alternatives studied by the developer and an indication of the main reasons for the option chosen.

National Policy Statement EN-1 recognises the presumption in favour of strategic energy infrastructure, but this does not exempt applicants from the duty to genuinely consider alternatives where significant environmental impacts are forecast.

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There is a significant failing by National Grid on these points, and this is important given the considerable effects Sea Link will have on protected wildlife and habitats at the locations proposed.

We just do not buy that there is no alternative to ploughing through RAMSAR, SSSI and SPA-designated Pegwell Bay and to situating the converter station at a location where the ecological and other environmental impacts will clearly be severe. We can only conclude, given the lack of transparent evidence provided to the contrary, that site allocation is based on speed and economic return with no genuine regard for the environment or biodiversity.

Failure to comply with Mitigation Hierarchy, insufficient mitigation measures proposed and ecological impacts: By selecting a route that cuts through SSSIs, SPAs and RAMSAR sites, Best and Most Versatile agricultural land and Flood Zones 2 and 3 without genuinely exploring alternatives, National Grid has jumped straight to mitigation, skipping the primary hierarchy stage of avoidance.

This is contrary to both the National Policy Statement and Environmental Impact Assessment Regulations.

The choice of Pegwell Bay as landfall and the associated converter station site at Minster Marshes is wholly unsuitable and evidences the failure to apply the Mitigation Hierarchy and to consider reasonable alternatives.

Others such as Kent Wildlife Trust will touch more on habitats and ecology and I do not wish to duplicate. As such, I will simply state the facts that the Sea Link application demonstrates insufficient baseline data for several species and there has apparently been only one season of protected-species surveys undertaken. For such a destructive scheme, we are shocked that National Grid appears to have relied on desk-based data and jumped to mitigation without any real evidence of current species distribution and population.

The applicant's apparent flippant approach to the countryside and wildlife is evidenced by its apparent approach to protected species. Great Crested Newt (GCN), European Eel, Hazel Dormouse and several bat species have all been inadequately surveyed, or in some cases not

surveyed at all. The applicant is instead proposing to rely on licensing schemes or “precautionary working methods” in lieu of properly evidencing the ecological baselines.

There are various issues with the proposed mitigation measures because, clearly, they are based on less than sufficient evidence for both population of species and understanding of the habitat requirements to support them. The safeguarding of our, in some cases critically endangered, wildlife and internationally important habitats has evidently been a tickbox exercise for National Grid, with little proper effort to engage with these requirements properly.

In line with the Mitigation Hierarchy, it is vital that avoidance is prioritised over mitigation and compensation and, as such, the location for Sea Link simply needs to be completely reconsidered.

Landscape: Obviously CPRE Kent are incredibly concerned by the impact Sea Link will have on the local landscape. These are agricultural landscapes where pastoral and arable farmland is actively managed. The construction of the converter station will result in a permanent land-use change and the industrialisation of this open and beautiful countryside.

The original Preliminary Environmental Information Report highlights that there will be significant effects on the landscape character areas of Wantsum North Slopes, Stour Marshes and Ash Levels, as well as one viewpoint east of Minster, but we argue that the report is inadequate in having fully determined the forecasted impact on landscape.

(Final) The transition to renewable energy should not and does not need to come at such a ghastly cost to our countryside and wildlife. To destroy carbon-sequestering habitat in the name of net zero is, at best, embarrassing. How ironic. CPRE Kent strongly object to Sea Link as it has failed to meet significant planning guidance, sits outside any strategic energy plan and will have demonstrable and irreversible impacts on our protected landscapes, endangered wildlife, local people’s health and well-being, green tourism our food security and so on and so on.

We urge you to reject this application.

Thank you.