

Sea Link Nationally Significant Infrastructure Project (NSIP) Application

Planning Inspectorate Reference: EN020026

Deadline 1 Written Representation by David Mairs,

Interested Party reference number: [REDACTED]

Introduction

I am a lifelong Thanet resident and naturalist.

Birds are a particular passion and I am familiar with Minster Marshes and Pegwell Bay through regular birdwatching in the area over several decades, while I have taken part in a range of surveys on Minster Marshes, for example BTO (British Trust for Ornithology) Golden Plover surveys and East Kent Lowlands [Bird] Surveys.

I have witnessed a range of industrial and urban development in the district over the years, but few have concerned me as much as National Grid's Sea Link project, which, if permitted, would prove ecologically damaging to Sandwich and Pegwell Bay National Nature Reserve and destroy a large swathe of Minster Marshes.

I believe this scheme is bad news for the countryside, bad news for wildlife and bad news for people.

Below is my Deadline 1 Written Representation. It sets out my currently-held views on the application documents as submitted and reviewed to date. My comments are hence necessarily provisional and may be refined or expanded as further evidence becomes available through the Examination process. They are made without prejudice to any future representations that I might submit at later stages of the Examination.

I have already set out my position and principal concerns in my Relevant Representation, which is before the Examining Authority. This Written Representation therefore updates, but does not repeat, those submissions.

I also recognise that the Applicant's change application has yet to be formally accepted, meaning comments cannot be made on that element. Accordingly, I reserve my position in this respect should the scope of the application or its supporting documentation materially alter.

I oppose National Grid's proposed Sea Link development on a range of grounds but will here include only the following:

1. Ecological and biodiversity impact:

It is still hard to believe that National Grid is choosing Sandwich and Pegwell Bay National Nature Reserve for its Sea Link landfall in Kent. The government describes our NNRs as "England's most important places for nature" - as a country we must be better in protecting them.

Instead, National Grid is proposing to drive high-voltage cables through this NNR, with its SSSI, SPA, SAC and Ramsar designations. Astonishing, simply astonishing!

Upstream from the NNR, Minster Marshes, National Grid's chosen site for a converter station, also comprise a fantastic area for wildlife and it is here that I will focus my comments as I understand other bodies are covering the many issues at the NNR.

Minster Marshes host significant populations of 32 Red-listed and 46 Amber-listed bird species, including struggling farmland birds such as Grey Partridge, Turtle Dove, Skylark and Tree Sparrow, while flocks of Golden Plovers and Lapwings, herds of Mute Swans and impressive numbers of such ducks as Mallard and Teal contribute to a sometimes-dazzling birdscape.

As noted above, I have watched this area and its wildlife evolve, adapt and change over the years, both on a 'personal' level and through involvement in 'official' surveys - I have lived this experience and would be betraying so much if I didn't participate in this Examination process.

Species such as Golden Plover and Lapwing (the pair often form mixed-species flocks) have declined markedly since I started taking part in surveys back in the 1970s. That is presumably why Golden Plover, for example, is a target SPA species protected by law - such designations are meant to mean something, not simply be cast aside or ignored when money-making operations such as National Grid see fit.

It isn't just birds that make Minster Marshes so special: Brown Hare, Beaver, Otter and Water Vole are among the mammals to make their homes here.

This far-from-exhaustive list gives an idea of quite how environmentally destructive National Grid's Sea Link proposals are - and that's without even considering the impact on Sandwich and Pegwell Bay NNR. I had believed (and hopefully still can) that the UK had progressed to a place where such wildlife was viewed as an integral part of our wider culture and was respected and protected as such. This Examination process will show how true that is.

2. Mitigation:

National Grid's proposed site for Functionally Linked Land mitigation is risible - indeed it's difficult to imagine the company's representatives submitted it with a single straight face between them.

Lying west of the A256 and effectively surrounded by urban and industrial development, the resulting light, noise and human disturbance are wholly at odds with the foraging and roosting needs of a target SPA species such as Golden Plover, flocks of which require swathes of open, unimpeded landscape.

I believe the suggested site should be dismissed out of hand.

3. Use of overhead pylons and cables, should the converter station be built, which of course I hope it isn't:

National Grid's two new lines of overhead cables and associated pylons as proposed at Minster Marshes are destructive to landscape and wildlife alike.

Their threat to birds and bats is undeniable - indeed, this area witnessed that horribly when in 2003, just a very short distance from the proposed site, 179 Mute Swans were killed in one incident of hitting overhead powerlines.

The proposed new lines would cross the Stour to join another line. The river is a migration flyway for many species of bird - to place pylons over it and cause potentially huge bird-kill would be wanton environmental vandalism.

Instead, it would be relatively straightforward to underground the short length of cables required.

National Grid claims that (wholly unspecified) "technical issues" prevent it from undergrounding here. Are we in all seriousness meant to believe that it is perfectly capable of laying many, many miles of cable under the North Sea, for example, but can't tackle a couple of miles under the River Stour!

If that is true, it casts serious doubt about the viability of this site for such a development in the first place.

4. A failure to consider alternatives:

In the National Policy Statements, EN-1 requires applicants to rigorously consider alternatives where significant environmental impacts are likely. The Applicant has shown no persuasive evidence of having done this.

It's evident that National Grid is choosing this location with a clear eye on the European market - it wants to build here because of the short distance across the English Channel, allowing it to sell energy to our near-neighbours with both the greatest ease and the greatest profit.

Our planning system should surely be based on more than private companies' wish to make money. I accept 'that's how things work' - private operators exist to make profit, but to attempt to do so with such disregard for our natural environment should not be acceptable.

5. A failure to adequately justify the needs case: The Applicant's oft-quoted line that Sea Link is required to bolster "Kent's energy resilience" simply isn't credible. The number and sheer scale of power stations, solar farms and wind farms in the county provide highly visible evidence that Kent provides more than enough energy for its needs - and indeed the needs of many surrounding areas.

Again, it is difficult to believe that the Applicant is choosing this location for anything other than money-making purposes.

6. Amenity impact: Birdwatchers, fishermen, walkers, river-users, residents... so many people use Minster Marshes as a place to enjoy the countryside. During the Covid-19 pandemic, barely a day seemed to pass without us being told about the importance of our wilder places... that message seems to have been forgotten as soon as it arrived and it is hard to credit National Grid showing such scant regard for people's well-being and their need for amenity.

Conclusion: The rush towards net-zero, in tandem with National Grid's rush to make ever more money, should not be at the expense of our environment... genuinely green energy doesn't trash nature. The crazed approach we're witnessing needs reining in... act in haste, repent at leisure.