

SBBOT SeaLink planning inspectorate submission v1

Sandwich Bay Bird Observatory in Kent was one of the country's first independent bird ringing stations, founded by local naturalists in 1952. Official Observatory status was achieved in 1962.

The Observatory (unlike many other observatories) owns a large amount of land which is also a home to rare plants and invertebrates. However, Sandwich Bay Bird Observatory's actual recording area covers a much wider area including Pegwell Bay, the three golf courses plus surrounding farmland and RSPB Worth Marshes.

Sandwich Bay Bird Observatory recognises the growing need for electricity to support people and businesses and therefore the need to reinforce our energy and specifically our electric infrastructure.

Sandwich Bay Bird Observatory feels that it is very important that we submit a response to the planning inspectorate on behalf of all our members after having our previous submissions to the SeaLink project team ignored.

The landing of the SeaLink cable at Pegwell Bay (SSSI, SPA, RAMSAR wetland) and the building of a new very large converter station on the linked land of Minster Marshes will, in our view, have a detrimental affect on the habitats and wildlife that currently exist in and use these areas - therefore we strongly oppose the siting of the project in these locations.

Pegwell bay, the Hoverport and Minster Marshes are wonderful natural environments with large open wild spaces that allow important species of birds, moths, butterflies and plants to either flourish or for some, still remain in East Kent as the pressures on nearby land for house building has had a devastating impact on their populations.

In Kent, the River Stour is a unique and very important wildlife corridor that connects the sea at Pegwell Bay all the way up past Canterbury, to Ashford. It is largely undisturbed. The River Stour is Kent's second longest river at 58 miles in length and is the the major river catchment of East Kent.

It is a critical that wildlife corridors like the River Stour valley are protected as so few now remain in southern England and so that they are fully appreciated in order to protect species for us today and for the future. It is clear that a full environmental

survey for this area has not been conducted by the SeaLink team and its true value realised.

The three main areas for development or use for the project being Pegwell Bay, Minster Marshes and the Hoverport are all importantly “linked land” each proven to be a key part of the bird and wildlife chain that supports such a diverse set of nature from birds to mammals to insects to plants. Damaging any of these will have a devastating effect on all.

For example -

a) Pegwell bay

i) This is an area protected under multiple designations and by legislation (Site of Special Scientific Interest, Special Protection Area, Special Areas of Conservation, and Ramsar Wetland of International Importance) famous for its diverse habitats and wildlife, including rare plants, migratory birds and seals.

ii) It provides a unique area in East Kent of undisturbed salt marsh and mudflats habitat for 100,000's of birds. Particularly wading birds and terns that include red and amber listed species such as Golden Plover, Curlew, Kentish Plover, Little Tern, Roseate Tern.

b) The Hoverport

i) This is a superb example of nature re-wilding an area that was built upon and then left deserted ever since the Hovercraft company building were demolished in 1992.

ii) It now supports rare moths (e.g. fiery clear-wing), butterflies (fritillaries) , plants and birds (greenfinches) now thrive there

iii) very importantly it gives a natural border to the salt marsh and mud flats of Pegwell Bay thus helping not disturbing the feeding and roosting birds there.

C) Minster Marshes

i) This is an area of wet farmland and was part of the original Wantsum Channel that separated the Isle of Thanet from the Kent mainland.

ii) The land remains very wet (especially in winter months) and is very rich in minerals and insect life which attracts a large number of birds to feed. Flocks of 000's of Finches and Stock Doves have been recorded plus important numbers of Reed Buntings, Yellowhammers and other small seed feeding birds too. However and In particular, it is an important feeding and roosting area for wading birds from Pegwell Bay to use during night time and at high tide - Curlew, Dunlin, Redshank, Snipe, Black-tailed Godwits and Jack Snipe.

So to summarise our concerns about the siting and building of this project

- No proper or complete environmental surveys have been conducted which is very disappointing and would question whether it is legal. For example, Sandwich Bay Bird Observatory holds detailed tidal bird survey records but has never been contacted even after we made the offer. The tidal survey records used are those from the WeBS counts, (the Wetland Bird Survey is the monitoring scheme for non-breeding waterbirds in the UK, which aims to provide the principal data for the conservation of their populations and wetland habitats). However, this survey is conducted on one day each month and therefore does not provide the full picture as weather and/or disturbance may have had an impact plus migrating bird populations present at a site will change from day to day, week to week.
- The siting of the large converter station on Minster Marshes is at odds with the Department of Energy Security & Net Zero National policy statement for Electricity networks infrastructure (EN-5). Published maps detail the effects of rising sea levels in the UK. These clearly show that the expected rise of 35cm in sea levels by 2050 will result in the converter station and a large amount of surrounding land will be under seawater.
- The land for the converter station is marsh land, Sandwich Bay Bird Observatory is concerned about the potential adverse effects on the water environment leading to Pegwell Bay due to the “squeezing out of water from beneath the weight of the converter station in to near by ditches, drains and eventually the river stour. This could have a marked impact on the unique large seal colony as well as the mudflats for feeding wading birds. Full consideration does not seem to have been made as required under the guidance in the Overarching National Policy Statement for Energy EN-1 section 5.16.2
- Pegwell Bay is a nationally and internationally recognised wildlife site and the damage to the salt marsh caused by National Grid’s previous project (the Nemo Link) is still evident. The proposal to drill under the bay will again cause major disturbance but SeaLink reserve the right to open trench if the under drilling is not possible. No evidence has been provided to explain why they can under drill this time.
- The Hoverport holds important species of wildlife and the proposed use for machinery and engineering works would effectively wipe out all of this. Additionally it would provide enormous disturbance, by sight and sound to the birds in Pegwell Bay hindering their ability to adequately feed and roost. Lastly it is not clear (even in the most recent application where the amount of land has increased again and now includes some salt marsh) how SeaLink plans to restore the area after its relatively short time of use.
- The building of more electricity pylons and power lines and at different heights to the existing ones will provide a real hazard for flying birds. Minster Marshes and the whole River Stour valley are used by large populations of Mute Swans and Wildfowl

particularly in the winter months and the time when they can be covered in fog. This new hazard will result in mass bird collisions as has been previously witnessed closer to Sturry.

- The offset land proposed for mitigation is of very low value for any wildlife due to its size, location, current use and power lines that run over it. A large area of similar and local wet farmland must be provided to allow for species such as Golden Plover to roost and feed without disturbance. As per the guidance in the Overarching National Policy Statement for Energy EN-1 section 5.11.25

Sandwich Bay Bird Observatory hopes that the planning inspectorate will acknowledge and take into account our feedback when reviewing the planning applications they have in front of them. Sandwich Bay Bird Observatory is also happy to provide any further detail or data if requested directly to the inspectorate.