



Summary of Written Representations
from the
Royal Society for the Protection of Birds

**Submitted for Deadline 1
18th November 2025**

Planning Act 2008 (as amended)

In the matter of:

**Application by National Grid Electricity Transmission for the
Sea Link Project**

**Planning Inspectorate Ref: EN20026
The RSPB Registration Identification Ref: F5280E651**

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1 INTRODUCTION

1.1 The RSPB

The Royal Society for the Protection of Birds (registered Charity England and Wales number 207076, Scotland number SC037654, 'the RSPB') was set up in 1889. It is a registered charity incorporated by Royal Charter and is Europe's largest wildlife conservation organisation, with a membership of 1.15 million (RSPB Annual Report 2023-24). The RSPB manages 222 nature reserves in the UK covering an area of over 158,000 hectares.

1.2 Summary of Concerns

The RSPB is seriously concerned that the Sea Link proposals are a considerable threat to:

- In Suffolk:-
 - the RSPB's North Warren Reserve,
 - Leiston-Aldeburgh Site of Special Scientific Interest (SSSI)
 - the Sandlings Special Protection Area (SPA),
- In Kent:-
 - Thanet Coast and Sandwich Bay Ramsar site,
 - Thanet Coast and Sandwich Bay SPA and
 - Sandwich Bay to Hacklinge Marshes SSSI.

We are extremely disappointed that infrastructure development has been proposed within important protected wildlife sites.

2 CONCLUSIONS REGARDING THE SUFFOLK ONSHORE SCHEME

In summary, we object to the project making landfall at RSPB North Warren/Leiston-Aldeburgh SSSI. The reasons for our objection are:

- Insufficient consideration given to avoidance of designated sites during the route selection process.
- Exploration of ecologically less-damaging alternatives too constrained geographically and on the basis of (now removed) need for co-location.

We also have significant concerns about the following:

- Ecological impacts of the proposed landfall including disturbance, damage to habitats and constraints on future management of the Leiston-Aldeburgh SSSI (and

functionally-linked SPAs) and RSPB reserve, along with potential impacts on the Sandlings SPA from the associated cable route

- Impacts of the project on the RSPB's landownership interests at RSPB North Warren

However, given that the project may be consented despite these concerns, we have made a number of recommendations in our comments above regarding the adequacy of the assessments and the proposed mitigation which should be addressed through the Examination of the Application. These are summarised below.

2.1 Suffolk Onshore Scheme – Description of Baseline

2.1.1 Proximity to Designated Sites

- Need to recognise within [PDA-017](#) Part 2 Suffolk Chapter 2 Ecology and Biodiversity that the project is not merely adjacent to RSPB North Warren and Leiston-Aldeburgh SSSI but instead includes parts of these sites within the Order Limits.

2.1.2 Ecological importance of North Warren

- We recommend that the area east of Leiston Road is considered to be of national importance for non-breeding birds, with European White-fronted Goose being of international importance
- We recommend that the breeding Lapwing population is considered to be of county significance
- Habitat mapping should recognise importance of ditches, footdrains, acid grassland and scrub/bramble habitats.

2.1.3 Designated sites – errors

- [PDA-025](#) ES Appendix 2.2.B Suffolk Wintering Bird Report should be corrected to state that wintering European White-fronted Goose is a feature of the Minsmere-Walberswick SPA and not the Alde-Ore Estuary SPA, and Woodlark is a feature of the Sandlings SPA, not the SAC.

2.1.4 Bird surveys

- For the 2024 Lapwing and Redshank figures, methods and limitations should be discussed and it should be acknowledged that the territory distribution maps may not accurately reflect the real locations of favoured areas.
- Maps used to show the abundance and distribution of wintering birds recorded during 2022/23 in [APP-216](#) should clearly indicate that the wet grasslands were not formally surveyed on the dates shown in the legend.
- Annex 2.B.2 (p63, ep67) of [PDA-025](#) ES Appendix 2.2.B Suffolk Wintering Bird Report is a compendium of WeBS data from Kent and not Suffolk and requires correction.

2.1.5 Other ecological surveys

- Given the decision not to survey the vegetation across the SSSI, any impacts on the vegetation, including due to proposed access routes or potential incidents such as frac-out need to be carefully considered.
- It should be recognised that Water Voles are present at RSPB North Warren

2.2 Suffolk Onshore Scheme – Landfall at North Warren

2.2.1 Use of trenchless techniques for landfall

- Seek reassurance that open-trenching across the SSSI would not be pursued in any circumstances (including via subsequent Change Applications or other applications to facilitate open-trenching).
- For clarity, we also request that the Draft DCO at Schedule 16, Part 2, Para. 10 (3) is updated to specify the ‘seaward’ HDD exit.
- Request confirmation that the list of additional activities and infrastructure required as part of the construction swathe and listed in para. 4.6.138 (p50, ep54) of [AS-093](#) Part 1 Introduction Chapter 4 Description of the Proposed Project does not apply to the trenchless crossing of RSPB North Warren/Leiston-Aldeburgh SSSI.

2.2.2 Risks associated with trenchless techniques

- Query the confidence around the statement that HDD feasibility is not likely to be affected by the presence of gravel as well as the potential impacts of any changes to drilling methodology.
- Seek reassurance that the available onshore borehole data is sufficient to give confidence in the conclusions that the HDD within the RSPB Reserve and SSSI will remain above the London Clay layer.
- Request for additional information to be provided to explain the freeing process should the drill head become stuck, any additional impacts on the RSPB reserve and SSSI (including from extending the construction duration and subsequent noise effects) and how these can be mitigated.
- Request that provision (B22) in [APP-342](#) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) regarding measures to avoid the trenchless drilling equipment getting stuck is updated to include details of mitigation measures.
- A report detailing the outcomes of hydrofracture modelling should be a required Obligation to be discharged before construction commences.
- Measure GH10 (drilling fluid breakout plan) in APP-342 REAC should include provisions that Natural England and ourselves are consulted with regard appropriate procedures within RSPB North Warren/Leiston-Aldeburgh SSSI; also that these procedures should include notification of both NE and ourselves of any incidents at the earliest opportunity.
- Request clarity regarding the likelihood of dewatering at launch pits being required and mitigation to be proposed to ensure that any dewatering does not affect water levels within RSPB North Warren/Leiston-Aldeburgh SSSI.
- The hydrogeological risk assessment referred to in GH10 of APP-342 REAC should be available to inform the assessment of impacts on the RSPB reserve and SSSI during the Examination.
- Information should be provided in order to understand the likelihood of occurrence (or multiple occurrences) of cable faults along with an assessment of the likely impacts of additional duct installation itself or the impacts of cable fault remedial action (including additional cable pulling).
- Further information about the risks and subsequent remedial procedures in the event of the empty cable duct collapsing or becoming unsuitable for use should be provided.

2.2.3 Noise and disturbance – noise modelling

- Recommend that it is clarified that noise thresholds proposed within the HRA refer to impulsive noise, represented by dB L_{Amax}
- Meaning of the mapped ‘average L_{Amax}’ contour should be clarified. We also seek reassurance that the map ‘for the project as a whole’ represents the worst-case scenario for impulsive noise and not an average level for the duration of the whole project. As contours have been calculated for all phases of the work, these should be made available to the Examination.
- It would be helpful for mapping to be supplemented by larger scale maps of the noise contours where they overlap designated sites, to aid identification of areas and species which may potentially be impacted
- Recommend that consideration is given to chronic noise levels, represented by dB L_{Aeq}, as this has been shown to affect densities and distribution of breeding birds.
- It would be helpful to specify the noise modelling guidance around assumed mitigation and to comment on the safety of the assumption, including any circumstances where this could be difficult to achieve.
- We request that the noise modelling carried out by Atkins is made available to be considered as part of the Examination documents.

2.2.4 Noise and disturbance – impacts during construction

- Given the broad timespan for reinstatement activities and the potential for these to cause disturbance, we query both when any reinstatement needed in the vicinity of RSPB North Warren/Leiston-Aldeburgh SSSI would be completed and the nature of any such works.
- Recommend that the potential for increased sensitivity of birds to disturbance at dawn, dusk and during the night during winter should be considered in the assessment of noise impacts.
- It should be made clear whether any piling activities could be required at the compound close to RSPB North Warren/Leiston-Aldeburgh SSSI and whether the current modelling and proposed mitigation take account of this.
- Given our concerns about the adequacy of the noise modelling information presented, we request that further consideration is given to the potential for disturbance of White-fronted Goose, Eurasian Curlew and other wetland birds on the basis of the additional information requested.
- We query whether the possible requirement for use of a pneumatic casing hammer at the seaward end of the HDD drill has been considered in the noise modelling and assessment of impacts on designated sites.
- The assessment of noise from continuous working during the HDD drilling process (which is planned during the bird breeding season) should consider potential impacts of work during hours of low light and darkness, when birds may be more sensitive to noise while they are roosting or through increased vulnerability to predation.
- The HRA should consider potential noise impacts on breeding birds during the drilling process, particularly Marsh Harrier
- We recommend that average (chronic) noise levels affecting the Sandlings SPA, Leiston-Aldeburgh SSSI (and Minsmere-Walberswick SPA/Ramsar and Alde-Ore Estuary SPA/Ramsar

through functional linkage) during the HDD drilling process are quantified to aid the assessment of impacts on breeding birds.

- Request that specific mapping of the noise contours for the drilling phase is provided including a range of noise contour levels. Also to include a map based on average sound level (dB LAeq) as well as a separate map showing impulsive noise levels (using dB LAmx).
- It is crucial that the mitigation required by measure B23 (such as acoustic fencing) is constructed at the beginning of the construction period, especially as the enabling works could have the highest noise impacts on designated sites.
- We also recommend that B23 should include identification of further mitigation should noise modelling indicate that thresholds have been exceeded.
- Given the potential reduction of impact afforded by an acoustic shed enclosing the HDD equipment, we suggest this should measure be included in the proposed mitigation.
- Recommend that bird distribution should be monitored during construction to indicate whether any changes are occurring and again, help to inform any need for further mitigation.
- Where GG10 (lighting) is applied to designated conservation sites, the phrase “where practicable” should be removed to comply with the mitigation hierarchy and GG21 (lighting) should explicitly include designated conservation sites.
- Further information regarding lighting and work at height is required to adequately inform this assessment, as fencing will not screen or reduce light spill from any activities taking place at height.
- Recommend that mapping of areas affected by visual disturbance is provided using a suitable threshold based on visibility of lighting, people and mobile infrastructure and the sensitivity of ecological receptors.

2.2.5 Noise and visual disturbance – impacts during operation

- Include measures in the REAC to carry out noisy and/or disturbing maintenance activities in August and September where this is practicable, to avoid disturbing breeding or wintering birds.

2.2.6 Access routes and emergency access

- The exact nature of access routes at RSPB North Warren, along with any works required to facilitate it, should be made clear, and potential impacts require proper assessment and mitigation.
- Request clarity on the exact scope of vegetation management proposed within the RSPB reserve and SSSI and note that suitable mitigation would be required to protect Schedule 1 species.
- It should be clarified that no surfacing of access routes is proposed within RSPB North Warren/Leiston-Aldeburgh SSSI.
- The section on construction phase habitat loss in Chapter 2 Ecology and Biodiversity should include implications of regular and emergency access and vegetation management.
- Request clarification of the circumstances which might require emergency access and the methods and equipment required, also of how the Applicant proposes to be able to reach all parts of the cable route in the event of a fault, and what effect this could have on habitats within the RSPB reserve and SSSI?

2.2.7 Construction compound

- Request that more detail is provided of the locations of any noise/visual mitigation screening at the construction compound is provided, so that impacts on the Sandlings SPA and Leiston-Aldeburgh SSSI (including RSPB North Warren) can be more fully understood.
- Due to the potential for disturbance impacts during the construction period (particularly from cable drilling), the location of the transition joint bay needs to be confirmed in order to adequately inform the assessment of impacts.
- Measures GG14, GG15, GG16, GH05 in [APP-342](#) REAC around control of contamination from runoff, wash down, storage areas etc should include explicit requirements to protect wetland habitats.
- Potential impacts of increased deer pressure arising from exclusions or restrictions to deer movement should be assessed and any required mitigation should be proposed. Impacts on the reinstatement and enhancement of habitats should be considered along with any necessary protection.
- The statement that air quality impacts from generators on Leiston-Aldeburgh SSSI lasting up to 3 years are considered a temporary impact requires further justification and supporting evidence to be provided.

2.2.8 Public access and recreational impacts

- Should any changes to public access or parking be required, potential impacts of changes in visitor use, including on designated sites, should be included in the assessment.

2.2.9 Unexploded Ordnance (UXO)

- Assessment is required of potential presence of UXO and any need for excavations within RSPB reserve/SSSI. This should include assessment of potential damage to habitats and disturbance to the SSSI and the nearby Sandlings SPA from any detonations required.

2.2.10 RSPB land management

- Request clarity as to whether any restrictions will be imposed on our land management activities during the construction (e.g. during cable installation) or operational periods which could limit our ability to manage and maintain habitats within RSPB North Warren/Leiston-Aldeburgh SSSI

2.3 Suffolk Onshore Scheme - Cable Corridor Impacts

- For the restored/enhanced acid grassland, we would encourage a mostly short sward with some bare ground retained if possible (around 5-10%), and provision of some areas with a sward of less than 3cm will optimise foraging for Woodlark. Arisings from mowing should be placed around the perimeter of the site.
- Provision B24 in the REAC (clearance of vegetation to deter nesting birds) is not guaranteed to be effective in our view and surveys and mitigation before construction takes place will still be required to avoid damage or disturbance to nests.
- Measure B35 (commence work during winter to deter nesting birds) also may not be successful and monitoring will be necessary to inform the construction programme, particularly as construction noise levels and types may vary.

- Measures B05 (clearance of vegetation to deter reptiles) and B02 (avoidance of vegetation clearance during the bird breeding season) may conflict in some locations – in this instance the reptile dispersal window could be reduced to September-October to avoid conflict.
- Surveys of bare ground during construction will be required to check for presence of Stone-curlews and, should nesting occur, suitable measures (which may need to include cessation of works in the area) would need to be put in place to avoid disturbing nesting birds.
- Impacts on key habitats for Turtle Dove and Nightingale (including scrub and mature hedgerows) should be avoided and minimised as far as possible and mitigation proposed for loss of habitat during time taken for re-establishment.
- To benefit Turtle Dove and Nightingale, we recommend that newly planted hedges be maintained at a height of 3m or more and allowed to grow at least 4m wide with brambles and other thorny climbers encouraged/retained.

2.4 Suffolk Onshore Scheme – Cumulative/in-combination effects with other projects

- The Co-ordination Document and HRA should acknowledge the need to robustly assess impacts of potential co-location on designated sites including repeated disturbance, additional infrastructure, potentially increased width of cable corridor and the increased risk associated with any failure/faults.
- The assessment of cumulative impacts from Sea Link and Sizewell C on White-fronted Geese of the Minsmere-Walberswick SPA should consider combined disturbance to commuting flights in winter.
- The HRA should consider the impacts of multiple projects disturbing multiple areas of the Sandlings SPA as this could result in a significant reduction in nesting and foraging habitat being available for Woodlark and Nightjar.
- The Applicant should liaise with Sizewell C and with site managers around potential impacts on the movement of deer around the landscape and potential effects of increased deer pressure on designated sites during the construction periods for these projects.

2.5 Suffolk Onshore Scheme – Monitoring and additional mitigation

- A programme of monitoring of project impacts on designated sites and important species populations is required to provide assurance that agreed thresholds are not being exceeded or that inadvertent impacts are not occurring and to enable additional mitigation to be put in place should unforeseen impacts occur.
- Recommend that oversight of the outputs of such monitoring and any requirement for additional mitigation should sit with an Ecology Working Group.

2.6 Suffolk Onshore Scheme – Habitat enhancements and Biodiversity Net Gain

- We request that plans for ambitious BNG which contributes to landscape-scale conservation of important habitats and species within Suffolk are submitted as part of the Examination.

- We recommend that habitat enhancements consider planting targeted at providing nesting, foraging and watering habitat for farmland birds (particularly Turtle Dove), where appropriate.
- Recommend that the Applicant liaises with local communities about opportunities to improve biodiversity along the cable route, in ways that benefit both wildlife and communities.

2.7 Suffolk Onshore Scheme – The RSPB’s Landownership

2.7.1 Compulsory Purchase Powers (CPO).

- CPO powers must be restricted to only those necessary. Article 20 Discharge of water and Article 51 Felling or lopping are not appropriate for a designated site.

2.7.2 Horizontal Directional Drilling (HDD).

- Contingency plans must be in place for any potential HDD failures which avoid any future need for open trenching at RSPB North Warren.

2.7.3 Designated Site

- [PDA-009](#) Statement of Reasons should recognise that part of the RSPB Reserve within the red line boundary is designated as part of a SSSI, National Landscape and local nature reserve.

2.7.4 Grazing

- There should be no restriction on the ability of graziers, and their animals, to freely move about the RSPB Reserve. There must be no severance of herds or grazing areas and there must always be the ability for grazing animals to access drinking water.

2.7.5 Fencing

- Any requirement for fencing should be clarified and any installation should take account of the designated site and its management as grazing marsh.

2.7.6 Vegetation Management

- The Application should recognise that, even with vegetation management, the proposed access routes would still not be suitable for vehicles, even quad bikes due to ground conditions.
- Vegetation management must be carefully controlled and minimised. Reinstatement must be agreed with the RSPB and preferably adopt a natural regeneration methodology. If new planting is required, it must be with native species agreed with Natural England and the RSPB.

2.7.7 Water Control

- The drainage management plan should be developed in consultation with RSPB as landowner and Natural England.
- Works should avoid impacting the sluice and drainage channel along the northern boundary of the DCO area at the landfall.

2.7.8 RSPB Visitors

- Clarity is required regarding whether the parking bay on Thorpe Road near access point S-AP-1 will be closed during construction of the scheme. Mitigation of visitor impacts may be required.

2.7.9 Schedule of Condition

- The photographic schedule of condition must be compiled with the ability to locate individual photographic points.

2.7.10 Intrusive Surveys

- Any further intrusive surveys require consultation with the RSPB and Natural England and assessment of impacts on the designated sites, Schedule 1 breeding birds and any interaction with our grazing operation.
- We request that ongoing monitoring of the scheme is undertaken including soil testing, ground level monitoring and hydrological impacts as a minimum.

2.7.11 Access Requirements

- Clarity is required regarding the nature, surfacing, purpose and proposed level of usage of the proposed access tracks in and around the RSPB Reserve.
- Access during HDD drilling operations across the reserve should be on foot rather than vehicle due to access difficulties and potential impacts. The RSPB are keen to avoid clearance and surfacing operations taking place which will ultimately not lead to the destination required.
- Any ditch crossing points need to be agreed with the RSPB to ensure minimal impact on SSSI management and the hydrology of the site.
- With regard crossing reference S/FO/0011.2), it would be more favourable to install a controlled crossing to allow users of the footpath to cross safely over the access track.
- We seek confirmation that the PRoW will not be utilised as a route for vehicles.

2.7.12 Incidents and Emergencies

- The Emergency/Incident Response Plan relevant to works on or adjacent to RSPB land should be approved by Natural England and RSPB and should include provision for the RSPB to be notified immediately should an unplanned event occur and consideration of access limitations and impacts and impacts on and contact with graziers.

2.7.13 Unexploded Ordnance (UXO).

- A full assessment of the potential presence of UXO is required, with suitable mitigation proposed.

3 CONCLUSIONS REGARDING THE KENT ONSHORE SCHEME

In summary, given the likely impacts of the Sea Link proposals on internationally and nationally designated sites in Thanet (Thanet Coast and Sandwich Bay SPA, Sandwich Bay SAC and Sandwich Bay to Hacklinge Marshes SSSI), their species and supporting functionally linked land, we object to this project. The reasons for our objection are:

- There is insufficient evidence to justify excluding other alternative routes in less sensitive locations;

- Less damaging route options appear to have been too easily discarded, at the expense of designated wildlife sites;
- Ecological impacts of the proposed landfall include direct loss of habitat, pollution, noise disturbance to designated features, loss of functionally linked land for Golden Plover and collision risk.

However, given that the project may be consented despite these concerns we have made a number of recommendations which are summarised below:

3.1 Kent Onshore Scheme – Description of Baseline

3.1.1 Proximity to Designated Sites

- Need to recognise within [PDA-021](#) Part 3 Kent Chapter 2 Ecology and Biodiversity impacts on Thanet Coast & Sandwich Bay SPA/Ramsar, Sandwich Bay SAC and Sandwich Bay Hacklinge Marshes SSSI

3.1.2 Description of Impacts

- There is need for clarity and transparency within the AS-007 Habitats Regulations Assessment Report regarding impacts, discussion of designations which are closest and most impacted first and clearly state which designation e.g. SPA, conclusions are referring to.

3.1.3 Stodmarsh SPA

- Further assessment required to justify screening out of impacts to Stodmarsh SPA given Hen Harrier record(s) and, if appropriate, consideration of mitigation.

3.2 Kent Onshore Scheme - Risks associated with trenchless techniques

3.2.1 HDD feasibility and methodology

- We seek reassurance that open-trenching across the Sandwich Bay SPA/Ramsar/SAC/SSSI site area and functionally linked land would not be pursued under any circumstances (including within the intertidal zone, and via subsequent Change Applications or other applications to facilitate open-trenching).
- We request further clarification is required regarding the potential impacts should drill equipment become stuck – freeing process, any additional impacts on the designated area and mitigation requirements.
- We request additional information to be provided to explain the freeing process should the drill head become stuck, any additional impacts on the Sandwich Bay SPA/Ramsar/SAC/SSSI (including from extending the construction duration and subsequent noise effects) and how these can be mitigated.
- Further information about the risks and subsequent remedial procedures in the event of the empty cable duct collapsing or becoming unsuitable for use should be provided.
- Further detail is needed on how any frac out event is to be managed.

3.3 Kent Onshore Scheme – Cable Route, Converter Station and Substation

3.3.1 Noise and machinery disturbance

- There is need to consider overwintering interest in noise mitigation timings of works to reduce disturbance to Sandwich Bay to Hacklinge Marshes SSSI.
- There must be inclusion of construction noise and vibration monitoring at the closest sensitive receptors at Minister Marshes and the designations, in order to assess accuracy of the modelling and confirm effectiveness of the mitigation, and/or inform additional mitigation requirements.
- There is need to consider the appropriateness of the converter station site, given the large quantity of fill and cut required to render it suitable, and the attendant risk of pollution. Robust consideration must be given to mitigation for any pollution impacts.

3.4 Kent Onshore Scheme – Functionally Linked Habitat Mitigation

- We request additional survey data to support assessment of the value of functionally linked land for Golden Plover or a more precautionary approach.
- Use of the peak count for Golden Plover reference in the PEIR is needed in calculations around carrying capacity. The maximum number of birds that occur must be used rather than an average.
- Further detail is needed as to why this location was chosen and how it would function appropriately. This must include sufficient monitoring of its current use by Golden Plover; if it is currently functionally linked land it cannot be used as mitigation.
- Consideration of a larger area of mitigation land is required to address concerns about indirect impacts and adequacy of the site.
- Clarification is required regarding how success of the mitigation land will be monitored, what success looks like and if not successful what would be the alternative.
- Further consideration is required regarding the long-term suitability of this site and its management, including variations in land use and whether it is appropriate to mitigate wet grassland with dry arable habitat, rather than like-for-like replacement.

3.5 Kent Onshore Scheme - Functionally linked land – Pylons and powerlines in the Minster Marshes area

- Caution should be applied to conclusions drawn from only one year's vantage point survey and four months' bird corpse surveys re collision risk and displacement.

3.6 Kent Onshore Scheme - Habitat creation plans

- Caution should be applied re conclusions of increase in ecological value of habitats in the long-term as the baseline value may be underestimated.
- We request clarity of where new habitats are proposed to be created to better assess the long-term value.

- Consideration is needed of wider species use of any created habitats to maximise their value.
- Impacts on key habitats for Turtle Dove and Nightingale (including scrub and mature hedgerows) should be avoided and minimised as far as possible and mitigation proposed for loss of habitat during time taken for re-establishment.
- To benefit Turtle Dove and Nightingale, we recommend that newly planted hedges be maintained at a height of 3m or more and allowed to grow at least 4m wide with brambles and other thorny climbers encouraged/retained, creation of new ponds and creation of foraging habitat.
- Liaison is urged with conservation and community groups about habitat creation/enhancement opportunities.

3.7 Kent Onshore Scheme – Habitat enhancements and Biodiversity Net Gain

- We request that plans for ambitious BNG which contributes to landscape-scale conservation of important habitats and species within Kent are submitted as part of the Examination.
- We recommend that habitat enhancements consider planting targeted at providing nesting, foraging and watering habitat for farmland birds (particularly Turtle Dove), where appropriate.
- We urge that habitats that take time to establish such as scrub and hedgerows, if being delivered off-site as part of BNG, are created as soon as possible.
- We recommend that the Applicant liaises with local communities about opportunities to improve biodiversity along the cable route, in ways that benefit both wildlife and communities whilst considering any potential recreational disturbance implications on sensitive habitats.

3.8 Kent Onshore Scheme –cumulative/ in-combination effects with other projects

- The Co-ordination Document and HRA should acknowledge the need to robustly assess impacts of potential co-location on designated sites including repeated disturbance, additional infrastructure, potentially increased width of cable corridor and the increased risk associated with any failure/faults.

4 CONCLUSIONS REGARDING THE MARINE SCHEME

The ‘adverse effect on integrity’ from displacement and disturbance impacts on Red-throated Diver as a qualifying feature of the Outer Thames Estuary SPA, is well known and formally acknowledged in the context of other infrastructure projects. Due to this and the known high sensitivity of this species to vessel movements, the following recommendations are made:

4.1 Marine Scheme Recommendations:

- Project-related vessel movements and cable installation, maintenance or decommissioning activities during the Red-throated Diver overwintering period, from October to May, should be avoided.
- In case of any, even occasional, need for project-related vessel movements within that period, they should also be subject to clearly detailed and practical bird avoidance measures to be set out in a detailed Vessel Management Plan.
- All proposed measures should be more fully detailed in the draft Red-Throated Diver Protocol and Outline Vessel Management Plan.

5 OVERALL CONCLUSIONS

In conclusion, based on the above concerns, we consider that significant impacts from the Application alone and cumulatively with other projects are likely on the following sites:

- Leiston-Aldeburgh SSSI, Suffolk
- Sandwich Bay to Hacklinge Marshes SSSI, Kent

We also do not agree that adverse effects on integrity can be excluded for the following sites for impacts from the Application alone:

- Sandlings SPA, Suffolk
- Minsmere-Walberswick SPA and Ramsar site and Alde-Ore Estuary SPA and Ramsar site (through impacts on functionally-linked land)
- Thanet Coast and Sandwich Bay SPA and Ramsar site and Sandwich Bay SAC, Kent

In relation to the Application in combination with other plans and projects, we do not agree that adverse effects on integrity can be excluded for the following sites:

- Sandlings SPA
- Minsmere-Walberswick SPA and Ramsar site and Alde-Ore Estuary SPA and Ramsar site (through impacts on functionally-linked land)
- Thanet Coast and Sandwich Bay SPA and Ramsar site and Sandwich Bay SAC
- Outer Thames Estuary SPA

We will continue to work with the Applicant on these concerns through the agreement of a Statement of Common Ground and/or a Principal Areas of Disagreement Summary Statement, setting out clearly the initial areas of disagreement and revised near the end of the Examination to show our final position to aid the Examining Authority.

However, for now we have serious concerns about the potential environmental impacts of the project and the adequacy of the information currently available and consider that the Application should not be consented in its current form.