

## **Matthew Denny – Spoken Representation to Sea Link DCO OFH**

**6<sup>th</sup> November 2025**

My name is Matthew Denny. I am a resident of Walberswick, and a professional ecologist with a PhD in disturbance impacts on birds.

I am concerned about the quality and breadth of the surveys and assessment underpinning the Habitats Regulations Assessment for the Sea Link proposal.

There has been inadequate survey effort for marsh harrier and nightjar, both qualifying species for the nearby Special Protection Areas (SPAs) (Sandlings, Alde-Ore Estuary and Minsmere-Walberswick). For example, much of the Sea Link development area is within the foraging range of marsh harriers breeding in the nearby Alde-Ore Estuary and Minsmere-Walberswick SPAs. Yet, despite marsh harriers being known to use the Sea Link proposal area, the species is not even mentioned in the Suffolk section of the Habitats Regulations Assessment. And dedicated surveys for the species were not undertaken, which does not follow standard practice.

The Habitats Regulations Assessment must consider whether the integrity of a population of a qualifying species will be impacted by the proposal. I do not believe this is possible to assess due to the deficient baseline survey data.

There are two specific derogation tests at the Appropriate Assessment stage of the Habitats Regulations process, which I believe the Sea Link proposal does not pass:

- Test 1 is the consideration of viable alternative solutions. I assert that Sea Link was too limited in considering suitable alternatives, and this is the same for the LionLink proposal partially included within this DCO.
- Test 2 is whether the proposal meets Imperative reasons of overriding public importance (IROPI). Given the evidence others have presented during this open floor hearing questioning the need for Sea Link at all, the project is clearly not imperative (see final point below).

I request that the examining authority pay particular attention when reviewing the adequacy of the baseline ecology surveys and assessments, and to consider in detail the above Habitats Regulations tests, which I believe the DCO application fails to address and meet.

I also question why the separate LionLink converter station should be partially consented under this application, and formally request that there is an issue-specific hearing on cumulative impacts, including in-combination effects on European Protected Sites.

Finally, on the issue of need, Sea Link is unnecessary at this time as not enough power is coming into the area that the Sizewell to Bramford Pylons can't deal with, at least until Sizewell C starts production 10-15 years hence. Pausing until after 2030 would be beneficial in assessing the need and new emerging technologies and funding models. Currently, the proposal does not pass the IROPI test and should be rejected.