



Final Submission and Summary of Position

**from the
Royal Society for the Protection of Birds**

**Submitted for Deadline 7
29 April 2026**

Planning Act 2008 (as amended)

In the matter of:

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

**Planning Inspectorate Ref: EN20026
RSPB Registration Identification Ref: [REDACTED]**

Overarching objection

We do not agree that the information presented demonstrates that adequate weight has been given to the need to avoid impacts on designated sites in both Suffolk and Kent throughout the evolution of the site selection process. In Suffolk specifically, we are disappointed that, despite the removal of co-location from the proposals, the Applicant has not fully considered options for the Sea Link project alone to avoid the Leiston-Aldeburgh SSSI. Given these concerns, we object to the Sea Link project landfalls in Suffolk and Kent due to the insufficient consideration of avoidance as the first stage of the Mitigation Hierarchy. We consider that the approach taken to site selection for the project could set a damaging precedent with regard to construction within SPAs, SACs, Ramsar sites and SSSIs.

The RSPB understands that the project may be consented despite our concerns; therefore, we have continued discussions with the Applicant and submitted comments throughout the Examination seeking to ensure that all potential impacts of construction on designated sites and their features in both Suffolk and Kent are avoided or mitigated as far as possible, should the project be consented.

We are therefore grateful for constructive discussions with the Applicant during the Examination and the progress made in some key areas, however, some areas of concern to the RSPB remain.

Key issues – Landfall sites in Suffolk and Kent

- **Landfall technique:** The increased clarity around feasibility of trenchless drilling techniques at the Suffolk and Kent landfalls, along with the provisions around remedying stuck drilling equipment, faults or frac-outs whilst minimising potential impacts on the Leiston-Aldeburgh SSSI in Suffolk and the Thanet Coast and Sandwich Bay SPA/Ramsar, Sandwich Bay SAC, and Sandwich Bay to Hacklinge Marshes SSSI in Kent is welcomed. However, the RSPB remain concerned about the possibility of future changes to the project, specifically to the provisions for trenchless techniques at the Suffolk and Kent landfalls, subsequent to a DCO (should this be granted) and any impacts these may have. Although, the RSPB acknowledge the potential for any such future changes falls outside the scope of the current Application, we do wish to raise this as a concern.

Other key issues in Suffolk

- **Unexploded ordnance:** We have particular concerns about disturbance and potential damage to habitats and disturbance to species from any detonation/disposal of UXO. Whilst progress has been made, significant areas of uncertainty remain.

- **Construction noise and visual disturbance:** We welcome the additional clarity around noise modelling and the significant improvements to the proposals for monitoring of noise levels and bird distribution and the mitigation of potential impacts on the Leiston-Aldeburgh SSSI and the nearby Sandlings SPA during the construction phase. However, we also have some remaining concerns about noise and visual disturbance arising from the drilling process and construction compound lighting, including concerns about potential cumulative and in-combination impacts on the Sandlings SPA and its features.
- **Hydrology:** Whilst helpful additional information has been provided by the Applicant, we have some remaining concerns about potential hydrological impacts of construction on the Leiston-Aldeburgh SSSI.
- **Access and land management within RSPB North Warren:** We welcome the considerable progress that has been made around the agreement of access routes and methods across the RSPB reserve during the drilling process, including to limit impacts on the RSPB's land management. We look forward to further consultation on this matter and ongoing dialogue around mitigating impacts of the presence of the cable on the RSPB's future land management.
- **Oversight of monitoring and mitigation:** we recommend that an Ecology Working Group is established for this purpose.

Other key issues in Kent

- **Suitability of the converter station site:** We welcome reassurances about mitigating pollution incidents. However, given the considerable loss of habitat units, we do not consider this biodiverse site suitable for the converter station. We welcome commitments to management measures around early planting of hedgerow and woodland areas and ensuring appropriate height and density of habitat for species such as Turtle Dove.
- **Golden Plover mitigation land - monitoring and maintenance:** We welcome further detail around long-term monitoring and maintenance of the mitigation land for Golden Plover and measures to limit potential disturbance there.
- **Bird diverters on all pylons:** We accept that the Applicant has agreed to install bird diverters on new pylons; we nonetheless consider that this also needs to be done as a precautionary measure on the existing wires in the Stour River area.

Key issues in the Marine Environment

Our concerns relate to potential cumulative and in-combination impacts on Red-throated Divers of the Outer Thames Estuary SPA.

- The agreed seasonal restriction on vessel movements to reduce potential disturbance to divers and which now includes the pre-lay grapnel run, as well as

the additional detail added to the Red-throated Diver Protocol has reduced the level of our concerns.

Conclusions

The RSPB consider that significant impacts from the Application alone and cumulatively with other projects are likely on the following sites:

- Leiston-Aldeburgh Site of Special Scientific Interest (SSSI), Suffolk; and
- Sandwich Bay to Hacklinge Marshes SSSI, Kent.

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

- Sandlings Special Protection Area (SPA), Suffolk; and
- Thanet Coast and Sandwich Bay SPA and Ramsar site and Sandwich Bay Special Area of Conservation (SAC), Kent.

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

- Sandlings SPA;
- Thanet Coast and Sandwich Bay SPA and Ramsar site and Sandwich Bay SAC;
and
- Outer Thames Estuary SPA.

We agree that adverse effects on integrity can be ruled out for the following sites, both from the Application alone and in-combination with other plans and projects:

- Minsmere-Walberswick SPA and Ramsar site and Alde-Ore Estuary SPA and Ramsar site (relating to impacts on functionally-linked land).