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South East Anglia Link

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Dear Sir or Madam,

Re: Sea Link Development Consent Order (EN020026)

Interested Party Reference: [REDACTED]

I am writing in response to the Secretary of State's letter of 22 September 2026, inviting Interested Parties to comment on the responses to her Request for Information dated 28 August 2026.

I remain deeply concerned about the environmental consequences of the proposed Sea Link project, particularly its potential effects on Pegwell Bay, Minster Marshes and the Sandwich Bay to Hacklinge Marshes Site of Special Scientific Interest (SSSI).

These are exceptionally important areas for wildlife, and I believe their protection must be given the weight it deserves when deciding whether development consent should be granted.

Paragraph 3 – Benthic mitigation plans

I support Natural England and Kent Wildlife Trust's position that appropriate benthic mitigation must be secured before activities capable of damaging marine habitats take place.

It is essential that mitigation measures are identified, assessed and agreed **before construction begins**, rather than being developed after damage has occurred.

The plans should contain clear monitoring requirements, measurable standards for assessing environmental harm and enforceable arrangements for remedial action if impacts are greater than anticipated.

Monitoring alone does not prevent damage. There must also be a clear commitment to act upon the findings.

Paragraph 4 – Intertidal habitats and the Sandwich Bay to Hacklinge Marshes SSSI

I share the concerns raised by Natural England and Kent Wildlife Trust about the effects of Sea Link on the protected intertidal habitats of Sandwich Bay and Hacklinge Marshes.

Kent Wildlife Trust has previously highlighted significant damage associated with the Nemo Link development, including alterations to sensitive intertidal habitats and concerns about incomplete recovery.

These existing impacts must be properly considered when assessing the cumulative effects of further infrastructure works in this sensitive area.

It is particularly important that evidence of recovery in one part of the intertidal environment is not assumed to demonstrate that every affected habitat has recovered.

I am concerned that National Grid's approach does not provide sufficient reassurance that further harm to the SSSI will be prevented, particularly when the cumulative effects of previous and proposed works are considered together.

I ask the Secretary of State to ensure that Natural England's assessment of outstanding environmental concerns is fully considered and that any unresolved risk of significant harm is not simply deferred until after consent.

Paragraph 5 – Irreplaceable chalk habitat

I am particularly concerned about the potential disturbance and permanent loss of chalk habitat identified in the Environmental Statement.

National Grid has itself acknowledged the irreplaceable nature of the chalk habitat concerned. This makes it all the more important that its loss is not treated as an unavoidable or readily compensable consequence of the development.

Where habitat is classified as irreplaceable, its loss cannot simply be justified by suggesting that another area could be improved or restored.

I ask the Secretary of State to apply the appropriate policy test under paragraph 5.4.53 of the 2024 National Policy Statement EN-1, as identified in the information request.

This requires proper consideration of whether wholly exceptional reasons exist and whether a suitable compensation strategy can be demonstrated.

The relatively small area of habitat affected should not diminish the importance of its ecological value or the need for rigorous justification.

Paragraphs 6–7 – Hovercraft operations at Pegwell Bay

I support Natural England's call for strict limitations on hovercraft use at Pegwell Bay.

The area supports important populations of marine wildlife, including seals, as well as internationally significant bird populations.

Hovercraft should be available for **genuine emergencies only**, and the definition of an emergency must be precise enough to prevent routine operational activities being treated as exceptional circumstances.

I also support Natural England's request for a precautionary assessment of the worst-case impacts of emergency hovercraft use, particularly in relation to noise, wildlife disturbance and the potential effects on seals.

Kent Wildlife Trust should receive advance notification of any proposed hovercraft operation wherever circumstances allow. Where an immediate emergency makes advance notice impossible, the reasons should be documented and reported afterwards.

Every use should be recorded, with sufficient information to establish whether the activity was justified and whether wildlife was disturbed.

There should also be continuing environmental monitoring, with enforceable measures if unacceptable impacts are identified.

Paragraph 16 – Protection of breeding birds

The breeding bird assemblage associated with the Sandwich Bay to Hacklinge Marshes SSSI deserves the highest level of protection.

I support extending the recognised breeding season from March through September and requiring appropriate ecological supervision throughout the year.

However, I do not consider that carrying out a nest check immediately before construction is sufficient protection.

Disturbance can affect breeding birds even where nests are not directly damaged or destroyed. Construction noise, machinery, vehicle movements and repeated human activity can all interfere with breeding behaviour.

I therefore ask that **construction work within the SSSI is prohibited throughout March to September**, rather than allowing work to proceed on the basis of a preliminary nest inspection.

I also consider that wording permitting construction simply because a nest check has been carried out should be removed from the relevant environmental commitments.

I am concerned that National Grid has already erected a site office next to a barn owl box at Minster Marshes which has been used by barn owls.

This raises serious questions about the consideration being given to breeding birds and the effectiveness of the proposed ecological safeguards.

The site office's proximity to the barn owl box should be urgently reviewed, with appropriate measures taken to prevent disturbance.

Protection must be preventative rather than dependent on discovering damage after it has occurred.

Paragraph 19 – Bird collisions with overhead power lines

I support Kent Wildlife Trust's call for appropriate bird diverters to be installed from the outset, rather than waiting until monitoring demonstrates that birds are colliding with power lines.

Although bird diverters are included within National Grid's proposed environmental commitments, it is essential that their installation is secured before the relevant overhead lines become operational.

In an area used by significant numbers of birds, including migratory species, it is difficult to justify a purely reactive approach.

By the time collision monitoring identifies a serious problem, avoidable bird deaths may already have occurred.

I also support Kent Wildlife Trust's request to extend the proposed monitoring period **from two years to five years.**

A longer period would provide a more reliable assessment of collision risks under different seasonal and environmental conditions.

Monitoring results should be available to the relevant conservation bodies, and there must be a binding requirement to introduce additional mitigation promptly where necessary.

Paragraphs 21–22 – Hazel dormouse surveys

I am particularly concerned about National Grid's conclusion that hazel dormice are likely to be absent from the affected sites.

Through my own involvement in dormouse monitoring, I know that these animals can be extremely difficult to detect. A failure to record dormice during surveys does not necessarily establish their absence, particularly where survey coverage, methodology or timing may be inadequate.

Dormice depend on connected habitats, including hedgerows, scrub and woodland edges. The removal or fragmentation of these habitats can have serious consequences, even where individual animals have not been detected within a particular survey area.

I strongly support Natural England's concerns about the adequacy of the survey methodology and the evidence being used to justify National Grid's conclusions.

National Grid should be required to undertake comprehensive, appropriately timed surveys of all potentially affected suitable habitat, using recognised methodologies, before development consent is granted. The results should be independently assessed rather than relying solely on the applicant's interpretation.

Where survey evidence remains incomplete or inconclusive, a precautionary approach must be adopted. The absence of confirmed records must not be used to justify habitat clearance or fragmentation without adequate protection.

It would be unacceptable to permit potentially irreversible damage to dormouse habitat on the basis of an inadequately supported assumption that the species is absent.

The Secretary of State should require reliable evidence of presence or absence, together with clearly defined, enforceable protection and mitigation measures, before any works affecting suitable dormouse habitat are authorised.

Paragraphs 26 and 33 – Unexploded ordnance

I am concerned that unexploded ordnance investigations and any subsequent clearance activities could cause further damage to sensitive marine and intertidal habitats.

Natural England has raised the possibility that detonations could result in damage requiring habitat restoration. I understand that National Grid has not adequately addressed this concern in its response.

This is not a minor issue. If an activity associated with construction could damage protected habitats, the environmental consequences and restoration responsibilities need to be established in advance.

I therefore ask that any necessary habitat restoration following unexploded ordnance clearance or detonation is expressly included within National Grid's enforceable commitments.

The results of relevant surveys should also inform the environmental impact assessment and Habitats Regulations Assessment wherever they reveal risks not adequately assessed previously.

These should not be matters left unresolved until construction is under way.

Paragraph 28 – Saltmarsh surveys and access routes

I welcome the proposal to extend saltmarsh surveys to include the final trenchless crossing alignment.

However, I am concerned about the suggestion that the precise locations and widths of construction access routes across sensitive mudflats could be determined after consent.

These details are central to understanding the potential impact on the habitats concerned.

The extent of physical disturbance cannot be properly assessed without knowing where access will take place and how much ground will be affected.

I therefore ask that the proposed access routes, including their precise locations and widths, are established, environmentally assessed and agreed with the relevant conservation bodies **before development consent is granted**.

Decisions about access through such sensitive habitats should form part of the assessment informing consent, rather than being left to subsequent construction planning.

Paragraph 32 – Winter restrictions on work at Pegwell Bay

I strongly support the proposal to prevent landfall works during the November to February wintering period.

Pegwell Bay is an important area for migratory and overwintering birds, which depend on these coastal habitats for feeding and resting.

I am concerned that restricting the protection to particular works below mean high water springs could leave other activities taking place nearby during this important period.

Birds do not recognise the boundaries used to define construction activities.

Noise, lighting, machinery and vehicle movements elsewhere around Pegwell Bay may still cause disturbance.

I therefore ask that **no construction work takes place at Pegwell Bay between November and February, rather than limiting the restriction to activities below mean high water springs.**

Protecting overwintering birds requires a consistent seasonal restriction across the affected area, not one dependent on the precise location or classification of individual construction activities.

Paragraph 44 – Tourism in Suffolk and Kent

The potential economic impact of Sea Link on tourism deserves a thorough and credible assessment.

Sandwich Bay, Pegwell Bay and the wider Thanet coastline attract visitors because of their scenery, wildlife, walking opportunities and natural environment.

Tourism and nature conservation are closely connected in this area.

I understand that National Grid has maintained that Thanet's tourism industry would not be adversely affected. I do not believe such a conclusion can be accepted without a convincing assessment of the likely consequences for local businesses, visitor numbers and the area's attractiveness as a destination.

I ask for a comprehensive assessment of the likely effects on tourism during construction, including impacts on access, visitor experience, landscape character and wildlife-related activities.

I am also concerned about the adequacy of the community compensation being proposed.

Financial contributions should reflect the actual scale and duration of the disruption experienced by affected communities. They should not be determined without meaningful consultation or presented as sufficient simply because funding has been offered.

Community compensation cannot replace the need to prevent environmental damage or demonstrate that the local economy will not suffer.

Paragraph 55 – Operational noise from converter stations

I support Kent Wildlife Trust's call for effective noise monitoring and enforceable mitigation arrangements.

I recognise that proposed controls include assessment of operational noise against the final equipment design, with approval requirements and mitigation arrangements.

However, establishing noise limits and approval procedures is not sufficient unless ongoing compliance can be demonstrated.

There should be independent noise monitoring following commissioning and a clear mechanism for investigating and addressing any breaches of the agreed limits.

Where limits are exceeded, there should be an obligation to investigate the cause and implement effective mitigation promptly.

Noise monitoring should be sufficiently independent and transparent to give affected communities confidence that the limits are being respected throughout the operational life of the development.

Conclusion

I recognise the importance of upgrading electricity infrastructure and supporting the transition to cleaner energy.

However, these objectives should not come at the expense of causing avoidable damage to some of Kent's most ecologically valuable and sensitive habitats.

Throughout this process, I have been concerned by the extent to which important ecological details, mitigation arrangements and monitoring commitments appear to depend on decisions being made after development consent.

Where environmental risks remain unresolved, I believe the proper approach is to require the necessary evidence and secure effective safeguards before consent is granted.

Pegwell Bay and Minster Marshes are not simply convenient locations for major infrastructure. They form part of a much wider ecological network that supports protected habitats, breeding birds, migratory and overwintering birds, seals and other wildlife.

I respectfully ask the Secretary of State to give full and careful consideration to the ecological concerns raised by Natural England and Kent Wildlife Trust, and not to grant development consent unless the environmental risks identified have been adequately assessed, any significant uncertainties properly addressed, and effective, legally enforceable safeguards secured. Where further surveys or mitigation plans are

necessary, the relevant works must not be permitted to begin until these have been completed and approved.

These habitats deserve more than assurances that damage will be monitored or addressed later.

Yours faithfully,

Nicola Warden

Interested Party Reference: 