

**PLANNING ACT 2008: APPLICATION BY NATIONAL GRID  
ELECTRICITY TRANSMISSION FOR AN ORDER GRANTING  
DEVELOPMENT CONSENT FOR SEA LINK PROJECT**

**PINS REFERENCE: EN020026**

**INTERESTED PARTY SUBMISSION FROM: Thanet Green Party**

**INTERESTED PARTY REFERENCE NUMBER:** [REDACTED]

**Thanet Green Party is supportive in principle of projects to deliver clean energy, but deeply concerned by many aspects of National Grid's Sealink proposals as they stand. We respectfully request the following points to be taken into consideration by the Secretary of State.**

**3: Benthic Mitigation Plan Condition:**

Kent Wildlife Trust and Natural England have highlighted the vital importance of ensuring that mitigation is in place before harm occurs, and regular, detailed monitoring to be insisted upon thereafter. We strongly support this stance. The NEMO project has shown us the extensive damage to SSSIs that can result when large-scale disruptive projects are not closely managed & monitored. We cannot take that risk again.

**4: Intertidal features Sandwich Bay to Hecklinge Marshes SSSI:**

In light of the above, we join Natural England and Kent Wildlife Trust in expressing grave concerns about National Grid's approach to preventing harm to the SSSI.

The Nemo project has already caused significant damage to this SSSI, including erosion of the saltmarsh at the Pegwell Bay National Nature Reserve. KWT cite evidence showing that five years later the saltmarsh has not yet recovered. They point out: *"the effects of Sea Link cannot necessarily be assessed against a baseline which assumes that the habitat is in a stable condition."* This project must therefore be considered in the context of the damage that has already been incurred and the cumulative impact of these major disruptions on the SSSI and the wildlife it supports.

To add to our concerns, NG also plan to bring in a third cable through Pegwell Bay, risking yet further harm. We believe this risks permanent, irreversible damage to this delicately balanced marine environment

In making her decision, the Secretary of State must consider National Grid's plans in full awareness of the context and damage already incurred.

### **5: Chalk Habitat and EN-1 paragraph 5.4.53**

National Grid themselves recognise that the chalk habitat is irreplaceable. Kent Wildlife Trust highlights that NG do not have sufficient evidence for their conclusion that their proposed impacts will not be significant. The proposed landfall at Pegwell Bay in particular is deeply concerning.

We urge the Secretary of State to apply the wholly-exceptional-reasons in making her decision. The proposed landfall at Pegwell Bay is deeply concerning.

### **7: Hovercraft at Pegwell Bay:**

NG's plans for 'emergency' use of hovercraft at Pegwell do not provide any detail on what constitutes an emergency or what levels of use might be anticipated. In their response on 21<sup>st</sup> September (C1-178) they say nothing about potential impact on wildlife, including birds & marine mammals. We support Kent Wildlife Trust's request for advance notification on the use of hovercraft and for continuous monitoring. We also believe Natural England are right to request a worst case assessment of impact on wildlife, including the area's significant seal population.

### **13: Converter Station Preferred Design:**

It is vital that local people and organisations know the proposed design for the converter station and what mitigations are planned to reduce its acknowledged serious negative visual impact on the landscape.

Yet National Grid have asked for 'flexibility' by keeping 4 possible designs on the table. NG's wish to make decisions at a later date exacerbates the already considerable concerns of the local community about this project and the impact of this huge new building.

It is difficult to see how the Minister can make a decision when the design has not yet been chosen.

## **16/32: Breeding birds/ timing of landfall works**

The documentation suggests that National Grid are taking a somewhat cavalier approach to protecting birds and nesting sites, which is very worrying. They have already set up a site office next to a barn owl box on Minster Marshes that was in use until recently. They must commit to not working in the SSI between March and September. The words 'after a nest check' in their proposals are inappropriate and should be removed.

They must further protect the migratory overwintering birds at Pegwell Bay by committing not working there between November and February. Their argument that such restrictions should only apply 'below mean high water springs' would allow winter works at Pegwell, which would be disastrous for overwintering bird populations.

There also appears to be no consideration of the potential impact of the 'emergency' use of hovercraft on bird populations.

## **19: Overhead line collision monitoring:**

Once again we support the arguments of Kent Wildlife Trust on putting preventative and proactive measures in place – in this case, for diverters to be fitted to power lines in advance and not after collisions occur. This is an important migratory route for birds and the proposal involves additional, larger pylons so preventative approaches and close monitoring are vital.

National Grid's suggestion that monitoring can cease after two years is inadequate. We support KWT's argument that 5 years are needed.

## **28: Saltmarsh survey & mudflat access routes/ Unexploded ordnance**

In the same vein, advance agreement on locations and widths of access routes is vital before any approvals can be given. This is not something that should be left until damage has been incurred.

## **26/33: Unexploded ordnance**

Natural England have pointed out that intertidal detonations of unexploded ordnance, which we know exists in this area, may require habitat restoration. National Grid do not appear to have responded but must commit to full habitat restoration.

#### **44: Impacts on Tourism:**

Perhaps most ludicrously of all, National Grid argue that there will be no impact on Thanet's tourism industry from the SeaLink project!

National Grid have not undertaken a full assessment of the impact of the project on tourism, either during the lengthy construction phase or afterwards, and their commitments under SE04/5 are vague. This is a major dereliction of duty and the Secretary of State must insist on their examining this impact in detail.

Tourism is a significant contributor to income generation in Thanet. A 2023 study showed Kent's visitor economy was responsible for £4.1bn in value and supported nearly 78,000 jobs – all significantly more than in 2021, showing strong recovery after Covid. In Thanet, 4.6 million people visited the area in 2023, generating £349m in revenue – a 65% increase on 2021. Local people rely on such income in this disadvantaged area. The visitor economy accounts for just under 20% of all jobs in Thanet, so it is a significant and growing contributor to local prosperity & wellbeing.

During construction, heavy plant and machinery will be transported across rural areas of Thanet, backing up traffic and possibly blocking rural roads. This will slow down incoming and outgoing traffic and reduce footfall in villages like Cliffsend and Minster, adversely affecting small local businesses, including bars & cafes, which rely on visitors, as well as disrupting the onward movement of goods across the Isle.

Vast quantities of aggregate will be required for the project, as NG have chosen to build on unstable marshland. This will need to be transported from a local site – probably the Bretts facility at Ramsgate Port, which relies on use of the port tunnel. This tunnel was recently shut for several months following an accident, and Kent County Council has stated that a minimum of £6 million is needed to improve the tunnel to comply with current safety standards. It is already shut on a monthly basis for maintenance – something local residents were assured would not happen during the construction phase for SeaLink, but which we have heard nothing further of since. We would appreciate confirmation that some arrangement has been made to carry out maintenance to the tunnel (which is clearly needed) only overnight to reduce impact.

The alternative route when the tunnel is shut runs along Military Road, a small, narrow, badly surfaced, mainly-pedestrian road that runs round Ramsgate Harbour past the historic Harbour Arches, which house local bars, cafes & small businesses popular with tourists. This gives rise to

serious health and safety concerns for visitors, residents and businesses. The effect of huge aggregate lorries lumbering along this small, pleasant harbourside walk will be clear damage to our visitor economy.

Many visitors come to Thanet for our rich history: the 2023 study showed the percentage of people indicating history and heritage as a key influence on their decision to visit had increased by 50% over the past 5 years. Julius Caesar is believed to have landed somewhere close to Pegwell Bay, and archaeological investigations have found interesting indications of the presence of Roman legions in this area. St Augustine also landed here and the Way of St Augustine attracts visitors to the area. Both of these sites appear likely to be significantly disrupted during construction – indeed, we notice that already heavy earthmoving machinery is working in the area, as if permissions had already been granted! To suggest that this will not have a significant impact on Thanet's tourism industry is ridiculous.

Finally, once the converter station is finally built, it will be visible for miles around, in what was an unspoilt rural area. Because NG have declined to decide on its design, we do not know yet what it will look like, but they recognise themselves that it will be highly visible from all directions and will disrupt the open views both visitors and residents value.

In conclusion, we respectfully ask the Secretary of State to take account of the deep concerns of residents and of local, regional and national organisations, and ensure that National Grid addresses these fully before a decision of any kind is taken.