

Dear Secretary of State,

Re: Sea Link Development Consent Order (EN020026) - Response to Request for Information

I write in response to your Request for Information of 28 August 2026 concerning the proposed Sea Link Development Consent Order.

Having reviewed the representations submitted by Natural England, Kent Wildlife Trust and National Grid, I remain deeply concerned that significant environmental risks associated with this proposal have not been adequately assessed, mitigated or resolved. For the reasons outlined below, I respectfully urge you to refuse development consent.

#### Benthic Mitigation Plan

I support the position of Natural England and Kent Wildlife Trust that mitigation measures must be fully secured and implemented before damage occurs. Monitoring alone cannot replace lost habitats or reverse ecological harm once it has taken place. Any consent granted without enforceable mitigation arrangements in place would expose sensitive marine habitats to unacceptable risk.

#### Sandwich Bay to Hacklinge Marshes SSSI - Intertidal Features

I share the concerns raised regarding the continuing impacts of Nemo Link on the Sandwich Bay to Hacklinge Marshes Site of Special Scientific Interest. Evidence suggests that environmental impacts have been extensive and remain ongoing.

These concerns are compounded by the cumulative effect of further infrastructure proposals. National Grid is proposing an additional cable corridor through Pegwell Bay, creating a significant risk that repeated disturbance and habitat degradation will undermine the integrity of the designated site. I am not satisfied that sufficient safeguards have been demonstrated to prevent further harm.

#### Chalk Habitat

National Grid has accepted that the chalk habitat affected by the proposal is irreplaceable. As such, I request that the Secretary of State expressly applies the "wholly exceptional reasons" test and compensation requirements set out in National Policy Statement EN-1.

Given the acknowledged irreplaceable nature of the habitat, the threshold for approval should be exceptionally high. In my view, that threshold has not been met.

#### Hovercraft Operations at Pegwell Bay

I support Natural England's request for a worst-case assessment of hovercraft operations impacts and Kent Wildlife Trust's request for advance notification and ongoing monitoring.

Particular consideration should be given to impacts on protected bird populations, migratory species and the local seal population. Until these impacts are properly assessed and understood, significant uncertainty remains regarding the environmental consequences of the proposal.

#### Breeding Birds - Sandwich Bay to Hacklinge Marshes SSSI (Paragraph 16)

National Grid should be required to commit to a complete prohibition on works within the SSSI between March and September to protect breeding birds.

The proposed caveat allowing works following a nest check is inadequate. Recent experience demonstrates the risks posed by construction activity in sensitive locations. National Grid has already established a site office adjacent to a barn owl box on Minster Marshes which was known to be in use. Such incidents raise legitimate concerns regarding the effectiveness of relying solely on site-level assessments.

#### Overhead Line Collision Monitoring

I support Kent Wildlife Trust's recommendation that bird diverters should be fitted from the outset rather than only after bird strikes occur.

A precautionary approach should be adopted where foreseeable impacts are known. I also support the recommendation that monitoring should continue for a minimum of five years rather than the two years currently proposed.

#### Hazel Dormouse Surveys

I agree with Natural England that additional surveys are required to establish a complete understanding of potential impacts on hazel dormouse populations.

A decision of this significance should not be taken where uncertainty remains concerning protected species.

#### Unexploded Ordnance (UXO)

National Grid has not adequately addressed Natural England's concerns that intertidal UXO clearance could result in habitat damage requiring restoration.

Any consent should require clear commitments regarding habitat restoration where environmental damage occurs. At present, these commitments appear insufficient.

#### Saltmarsh Survey and Mudflat Access Routes

The locations and dimensions of access routes through environmentally sensitive areas should be agreed and assessed before any consent is granted.

Deferring these details until after approval would prevent a full understanding of the project's likely environmental impacts.

#### Protection of Overwintering Birds

I am concerned that National Grid's proposed restriction on works between November and February applies only below mean high water springs.

This leaves open the possibility that works could continue elsewhere within the Pegwell Bay area during one of the most environmentally sensitive periods of the year. No construction activities should take place within Pegwell Bay between November and February in order to safeguard internationally important overwintering bird populations.

#### Tourism Impacts

The assessment of tourism impacts appears incomplete and does not adequately reflect the importance of the natural environment to the local economy.

The suggestion that Thanet's tourism industry will not be affected is difficult to reconcile with the scale and duration of the proposed construction works. The compensation proposed is, in

my view, wholly inadequate when measured against the potential long-term impacts on visitors, local businesses and the area's environmental reputation.

#### Converter Station Noise

I support Kent Wildlife Trust's request for robust monitoring and mandatory mitigation where noise limits are exceeded.

Such safeguards are essential to protect both local communities and wildlife from potentially harmful operational impacts.

#### Strategic Importance of Minster Marshes

I would also urge you to give particular weight to the importance of Minster Marshes as a nationally significant environmental asset.

While peatlands rightly receive strong protection due to their role in carbon storage, biodiversity conservation and climate resilience, marshland ecosystems provide many of the same critical environmental functions. Minster Marshes contributes to carbon sequestration, flood management, habitat connectivity and nature recovery, while supporting a wide range of protected and priority species.

Marshes should therefore be considered on an equivalent footing with peatlands when assessing environmental harm and public interest. Like peat bogs, marshland ecosystems develop over long periods and cannot simply be recreated through compensatory measures. Damage to these habitats may be irreversible.

In considering the balance of harm and benefit, I respectfully submit that Minster Marshes should be afforded the same strategic significance as other nationally important habitats, including peatlands.

#### Conclusion

Taken individually, each of the concerns outlined above raises serious questions regarding the adequacy of the project's environmental protections. Taken collectively, they demonstrate a pattern of unresolved environmental risk, insufficient mitigation and continuing uncertainty.

For these reasons, I respectfully ask that you refuse development consent for the Sea Link project.

Yours sincerely,

Michelle Bromwell