

#### **GUIDANCE FOR COMPLETING NATIONAL GRID SEA LINK FEEDBACK**

### **Deadline: Monday 18th December 2023**

The first National Grid Sea Link consultation period is nearly finished, and we need as many people as possible to complete the form and have their say on the proposals before the deadline. You can fill in the consultation document <u>online</u> or complete a hard copy of the form and post it in.

PLEASE NOTE THAT IF YOU COMPLETE THE FORM ONLINE, YOU CANNOT SAVE YOUR WORK IN PROGRESS, AND ONCE YOU SUBMIT, YOU WILL NOT BE ABLE TO SEE YOUR COMPLETED SUBMISSION.

We strongly recommend you either draft your responses in Word and copy and paste them into the form or complete a paper copy and photocopy before sending.

Paper forms are available from libraries in Ash, Newington, Ramsgate, Minster, Sandwich and Margate. No forms are available from Broadstairs Library. You can also contact us at <a href="mailto:saveminstermarshes@gmail.com">saveminstermarshes@gmail.com</a> or at <a href="mailto:saveminstermarshes.com">www.minstermarshes.com</a> and we will get you a hard copy.

You can also email your comments at <a href="mailto:com">contact@sealink.nationalgrid.com</a> You can send another message if you think of things later. Please keep a copy of what you send and note the date.

## What is the consultation process about?

National Grid's Sea Link project is a Nationally Significant Infrastructure Project (NSIP) which means it must go through a legally required process. At the end of this process in Spring 2026, the Secretary of State will evaluate all the evidence and decide how to proceed. The Sea Link project is currently in the 'Pre-Application Stage' when the public is invited to put forward their views on the planned development. The following link will take you to the Government's Planning Inspectorate site where you will find a short video that explains the process. <a href="https://infrastructure.planninginspectorate.gov.uk/application-process/the-process/">https://infrastructure.planninginspectorate.gov.uk/application-process/</a>

If you were unable to attend the National Grid's public information exhibitions or would just like a refresher on the proposals, you can read them here: <a href="Sea Link">Sea Link</a> | National Grid ET, watch their webinar here: <a href="https://players.brightcove.net/867903724001/default\_default/index.html?videoId=6342171244112">https://players.brightcove.net/867903724001/default\_default/index.html?videoId=6342171244112</a> and read their reasoning pages here: <a href="https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure-projects/sealink/need-network-reinforcement">https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure-projects/sealink/need-network-reinforcement</a>?



### How should I complete the form?

The following guidance may help you shape your comments when completing your feedback form. You may have other information you want to add or may not want to use what is included below. It is important you use your own words and phrases.

## Principle of development

1. Do you support the principles of reinforcing the network in this location?

Option 2: No

Do you have any comments to make about the principle of reinforcing the network between Suffolk and Kent?

I do not support the location of Minster Marshes for the Sea Link convertor station and associated infrastructure for the following reasons:

- The site is in close proximity to the National and Internationally protected marine environments of the Thanet Coast and Sandwich Bay Special Protection Area, Special Area of Conservation and Ramsar site, Sandwich Bay and Hacklinge Marshes SSSI, Sandwich and Pegwell Bay National Nature Reserve. The main converter and substation buildings are not on these sites but will clearly negatively impact wildlife, while the associated infrastructure, much of which will be under or on these protected areas, will certainly have severe consequences.
- The site is also adjacent to the Minster Marshes SSSI, a strip of protected land which supports an extensive variety of wildlife, many of which are protected by the Wildlife and Countryside Act 1981 with key species endangered and on the Red List.
- The general location has already seen planning approvals from a number of other power related developments, for example the Battery Plant and Grid Stability Plant. The Nemo link has resulted in a convertor station and associated infrastructure being built on the old Richborough Power Station site close by. My concern is that the biodiversity of this area has already been drastically affected by this number of large developments, and it is therefore extremely important that the cumulative impact of these combined developments and any future ones are taken seriously into consideration.
- It is in an area that is prone to flooding and is also at risk of total submersion with rising sea levels.

I do support de-carbonisation and think linking energy sites is a good idea to better distribute renewable energy in particular, but I feel there are brownfield sites available which would be a better choice as well as Modular Offshore Grid options which should be fully explored. The document gives no information about what alternative sites were looked at and what evidence was gathered to select Minster Marshes.



## Questions 2 to 10 – updated guidance 12/12/23

These questions concern the Suffolk end of the project. <a href="https://suffolkenergyactionsolutions.co.uk/">https://suffolkenergyactionsolutions.co.uk/</a> has been established to fight the development there has published some useful guidance to answer these questions which is reproduced below.

2. Do you support the principles of reinforcing the network in this location?

**Option 4:** The changes are negative

Tell us more about why you have selected this option and anything else you would like us to take into consideration:

Previous feedback requested use of brown field sites or an offshore solution, this wasn't incorporated. National Grid has ignored concerns at all stages of previous consultation. The options are not improvements, they will devastate our local natural environmental and the tourism economy.

3. What do you think about our proposal to connect into the existing network via proposed Friston substation?

Option 3: It's not the best location to connect into the existing network

Tell us more about why you have selected this option and anything else you would like us to take into consideration:

Sea Link proves Friston (which has two outstanding Judicial Reviews) is not the best location to connect, because there is no capacity to transmit from here to where the energy is needed. It is a rural hamlet, without the road infrastructure needed to build a substation, in an area subject to flooding. The choice of Friston for the substation also means the associated infrastructure is in green field, areas of AONB and SSSI. Totally the wrong place. There are brownfield alternatives which are far less damaging.

4. What do you think about our proposed HVAC cable route in Suffolk?

Option 4: I disagree with the proposed cable route

Tell us more about why you have selected this option and anything else you would like us to take into consideration:

A High voltage alternating current (HVAC) underground cable of approximately 1.7km in length between the proposed Friston substation and the proposed Converter station (near Saxmundham) would not be needed if the power could be transmitted via the existing network. The connection to the network should be elsewhere or from windfarms to an offshore network. This cable is taking the power away from Friston back out to sea to South-East/London. Why bring it ashore to begin with to a new proposed substation at Friston?

5. What do you think about our proposed converter station, including the proposed location?

Option 3: I do not think the convertor station is in the right location

Tell us more about why you have selected this option and anything else you would like us to take into consideration:



The converter station would not be needed if alternative solutions are developed. The location is not suitable for this scale of industrialisation and the road network would not sustain the construction. It is of concern that you suggest that up to three converter stations could be built at the same location!

6. What design approach would you like to see explored for the converter station?
Options include a green roof, what colour, what shape for the buildings. Suggest select none of them
Tell us more about why you have selected this option and anything else you would like us to take into consideration:

This question presumes the converter station will be built. It should not be, it can never be landscaped or designed to blend into the area which is not industrial.

7. What do you think about our proposed HVDC cable route in Suffolk?

Option 4: I disagree with the proposed cable route

Tell us more about why you have selected this option and anything else you would like us to take into consideration:

A high voltage direct current cable connection of approx. 10km in length between the proposed converter station near Saxmundham and a transition joint bay approximately 900m inshore from a landfall point is not needed if other solutions were developed. There will need to be haul roads, workers compounds/parking, areas for spoil and equipment access to dig the trench across rural, farm land with residential properties in an area of tranquillity, dark skies and important habitats. This will negatively affect wildlife, the environment, people's lives and our tourism economy. The joint bay has been located immediately adjacent to the Area of Outstanding Natural Beauty and North Warren RSPB reserve which should be protected from development.

8. What do you think about our proposed landfall between Aldeburgh and Thorpeness?

Option 4: This is not the best location

Tell us more about why you have selected this option and anything else you would like us to take into consideration:

This is not the best location. This is totally unacceptable in an area of Outstanding Natural Beauty, SSSI, part of the North Warren RSPB nature reserve and internationally important for our tourism economy, enjoyed by everyone for their mental and physical health and well-being. This option has been discounted by other developers. It is of great concern that you claim that up to three projects could use this area for landfall.

Q.9 Our proposals include the option of co-locating infrastructure with that of up to two other

projects, if they are required. Do you support this approach?

Option 4: I do not support co-location

Tell us more about why you have selected this option and anything else you would like us to take into consideration:

Co-location is not coordination, as infrastructure remains separate. It will not reduce the main infrastructure footprint, only minor elements such as worker compounds if projects are co-located into the same area. More infrastructure in one place will increase the harmful impact even more, even if it is done at the same time. If the project were co-located to the same brownfield site or to an offshore hub and grid I would support co-location in principle.

Q.10 Anything else you would like us to take into consideration when developing our proposals in Suffolk?

Yes, you need to present the complete picture of energy projects in this area, not just isolated projects.



## **Our Marine Proposals**

# 9. 11. Do you have any comments or issues you would like us to take into consideration regarding our marine proposals?

The proposals involve running a cable through a nationally and internationally protected wetland and bay: the Thanet Coast and Sandwich Bay Special Protection Area, Special Area of Conservation and Ramsar site, Sandwich Bay and Hacklinge Marshes SSSI, Sandwich and Pegwell Bay National Nature Reserve, and in particular the precious habitat of the small saltwater lagoon between the country park and Jet petrol station.

This area and its ecosystem have already been massively damaged by the recent Nemo Link construction and the Sea Link project will cause incalculable further harm. It seems frankly bizarre that the Nemo Link did not include any 'future proofing' element to reduce the impact on our protected and highly vulnerable marine environment, nor did they complete the promised biodiversity mitigation along the artificially created berm.

In addition, National Grid seems to have given no consideration of alternative sites such as:

- The possibility of an offshore converter, as they are doing off the coast of Belgium where new technologies are being developed that will future proof their supply and which would limit the impact on land, or
- The use of the old power station site at Kingsnorth, near Rochester on the Hoo Peninsula. This
  brownfield site would enable connection to the National Grid and reduce the length of subsea
  high voltage direct current cable needed. Dungeness is also an option that may be suitable and
  seems not to have been considered.

## Our proposals in Kent

### Landfall

#### 12. What do you think about our proposed landfall at Pegwell Bay?

Option 3: I do not feel that this is the best location for the landfall

Tell us more about why you selected this option and anything else you would like us to take into consideration:

Running the cable straight into this extremely sensitive and fragile wildlife area will cause incalculable and irrevocable harm to the habitat. This is the only remaining wildlife haven in an area which has seen enormous amounts of construction in the last ten years, and it is crucial for the ecosystem of the area that this is maintained and protected. The bay, SSSI and marshes combine to create a superhighway of bird movement both for wetland birds and migratory birds which will be destroyed by your proposals.



As outlined above, there are a number of other alternatives which would have a less detrimental impact on wildlife including offshore, Kingsnorth or potentially Dungeness. Even landfall on the other side of the river would have less impact on wildlife and would also be closer to the pylon connections.

## High voltage direct current (HVDC) cable corridor

#### 13. What do you think about our proposed HVDC cable route in Kent?

**Option 4:** I disagree with the proposed cable route

# Tell us more about why you selected this option and anything else you would like us to take into consideration:

There is very little detail in your proposals about how these cables will actually be installed. As described above, the installation of the Nemo Link caused immense damage to the area. The proposed route for Sea Link will cause even greater damage. The additional pylons will be responsible for even more completely unnecessary and preventable bird deaths than we currently see.

### Minster substation and converter station

# 14. What do you think about our proposed converter station and adjacent substation near Minster?

Option 3: I do not think the substation and the converter station are in the right location

The proposed location for the converter station and adjacent substation is a very poor choice. The planned site is Grade 2 Agricultural Land – very good quality. Protecting the UK's ability to produce our own food to avoid reliance on imports is crucial and the location currently produces in excess of 110 tons of wheat a year which will be lost if this land is compulsorily purchased.

In addition, the site is a haven for wildlife and supports a unique biodiversity. The convertor station and associated construction will not only cause immense damage to the local ecosystem during its lengthy construction but will also have a long-term impact which will be nothing short of disastrous. The massive construction will not only affect wildlife through its sheer mass but the pylons, light pollution, noise pollution and electromagnetic fields will all adversely affect this fragile landscape.

The flood risks do not appear to have been considered. In the short term, this will impact Southern Water's ability to expand its sewage treatment operations which will be critical to deal with the additional load created by the expansion of housing in Thanet.

The proposed construction will inevitably create massive amounts of 'run-off', even with mitigating measures such as a green roof. A large part of the marshes will no longer soak water up because the vast area of the building will mean there will be nowhere for the rainwater to go.



According to Climate Central forecasts, this site will be underwater by 2050. This will necessitate building additional flood defences near the proposed cable landing site at Pegwell Bay and in Sandwich Town to stop the River Stour breaking its banks, as it has already done on several occasions.

Creating holding lakes or underground tanks will be of little use as the area is already just above sea level and saturated most of the year. We were not provided with modelling of this, or an assessment of how it would affect surrounding areas and buildings as well as the village of Minster itself.

15. We have identified several design approaches for the proposed converter station. Which approach(es) would you like to see explored at later design stages?

We recommend selecting Green Roof and Adding Colour from among the options presented here.

Tell us more about why you selected the above option(s) and anything else you would like us to take into consideration:

It is difficult to comment fully on the design approaches for the converter station without more information. It is surprising that you have not provided visibility splays from all the approach roads and surrounding areas in the same way as is required for normal planning applications.

A living green roof to all structures is a low maintenance option which will provide a degree of mitigation to loss of habitat for pollinators and go some way to alleviating run-off during rainfall. Paintwork to camouflage the size and scale of the buildings would also be welcomed.

### **Overhead line Connection**

16. What do you think about our plans to use overhead lines to connect the proposed substation into the existing Richborough to Canterbury overhead line?

Option 3: I disagree with the plans to use an overhead line connection

Tell us more about why you selected this option and anything else you would like us to take into consideration:

There is already a serious issue with birds colliding with the existing overhead powerlines. Adding even more, especially in the 'migration superhighway' between Pegwell Bay and Minster Marshes, will have a disastrous impact on bird life. The spiral style bird flight divertors National Grid has displayed at the public consultation meetings are significantly less effective than the flapper type in preventing bird collision with power lines, particularly at night and during fog which is a regular feature of this low-lying landscape. National Grid needs to do more investigation into identifying and deploying the most effective solutions to reduce bird deaths caused by high voltage power lines.

The proposals should seek to reduce the number of pylons as much as possible and run cabling underground and/or bridge over rivers.



As per international best practice, all pylons should be constructed with nesting platforms to encourage birds such as peregrine falcons, ravens and storks.

## **Anything else?**

# 17. Is there anything further you would like us to take into consideration when developing our proposal in Kent?

The document should have given greater information concerning other sites and why these were discarded, and the Minster site preferred. I am also extremely concerned that the 'cumulative impact' of a number of significant and already approved projects: Battery Plant (F/TH/22/0579), Grid Stability Plant (F/TH/23/0170), as well as future proposals in the pipeline, including the possibility of increased battery storage and solar farms, has not been mentioned. While National Grid may not be responsible for these, the lack of joined up and cohesive planning is extremely concerning.

The impact on the environment, biodiversity, flood risk, light and noise pollution, loss of amenity, transport and effect on neighbours has not been considered in relation to the project itself in this documentation. It makes absolutely no mention of the combined impact of all projects in the area. The Minster Marshes for example will be directly and indirectly impacted by the Sea Link Project but are also being directly and indirectly affected by all the other projects going on in the area that are encroaching from all sides and given the height of the converter, from above as well.

These developments are also located close to Southern Water's Sewage Treatment Plant, and it is well documented that the system is not coping. This additional development would limit the possibility of expansion of the sewage treatment plant, something many feel is necessary given the present situation and increased housing stock being given planning permission in the area. The increased risk of flooding due to run off is likely to also affect the sewage treatment plant.

### Construction

#### 18. Do you have any key concerns regarding the construction stage of Sea Link?

- o Impact on people
- Landscape and visual impact
- Ecology and biodiversity
- Air quality
- o Noise
- Traffic and transportation
- Archaeology
- Public access to rights of way (such as bridleways)
- o Disruption to land use
- Drainage
- Impact on tourism
- Impact on recreational activities
- o Other



We recommend ticking all options with the exception of air quality which will not be impacted, and 'other' which is pointless given there is no opportunity provided to expand. However, if you are responding by email and using these questions as guidance only, you may consider adding that "light pollution is missed from the list. All these items are of concern not only during the construction phase. The question is therefore misleading. "

### **Environmental Areas**

19. Do you have any comments about how we could deliver environmental mitigation and enhancement (such as hedgerow creation, native tree planting or funding local wildlife groups) as part of our proposal?

You have not given us enough information to fully answer your question, so until more information is given regard this as an interim response that can be added to:

- Any mitigation works finally agreed such as scrub areas, trees and hedges must be planted in advance of starting any scraping of the existing site to allow wildlife to move.
- Buy land behind the proposed build to turn it into further managed wildlife areas to be managed by an independent community group. This should encourage mixed native woodland, and scrubland with a focus on nightingales and turtle doves.
- Find and purchase an additional 300 acres of wetland and gift the land to the management of an NGO such as Kent Wildlife Trust or the Royal Society for the Protection of Birds. That land and any other parcel of land must be protected from future development in perpetuity.
- Finish your surveys with RSPB and all the other groups and publish the results.
- Undertake a flora survey by recognised experts in the field before making any decisions.
- The buildings must have green living roofs to help to reduce impact of heavy surges of rain run-off and to allow butterflies and solitary bees to flourish.
- There must be no more pylons or crossed pylons creating a net effect. Pylons are a hazard to birds' flightpaths. What pylons there are currently must have nest boxes for species such as kestrels, peregrine falcons, ravens, swift, swallows, house martins and stork as well as bats. There is an increasing number of mosquitoes, and the birds will help in controlling their numbers. (If Terria have been doing this for years in collaboration with Omnia Italica, so can you). Ensure any boxes do not face into the prevailing wind.
- Damaged owl boxes to be replaced.
- 30X pole mounted barn owl nest boxes.
- 30X pole mounted bat boxes.
- Golden Plovers are in this area and must be nurtured.
- Underground cabling only under the river. Should that be found to be impossible, then low level bridging.
- Have small, low level access holes in all fencing to allow movement of mammals.
- Any brickwork carried out needs to have bee bricks in at a minimum of 1 every 4 square metres.
- Cumulative impact must be stopped, and a proper wildlife corridor provided for the migration superhighway.
- Wildflower meadows to be created.
- The critically endangered European eels are currently thriving and must be encouraged to continue to thrive. Seek professional advice.



- Ban the use of rodenticides
- Limit the amount of hard standing areas and include a filter system to deal with run-off from the converter site. The run-off will, in any event, contain pollutants plus micro plastics from vehicle tyres.
- Any lighting to switch off by 10.00pm at the latest. CCTV to be infra-red only. The whole island of La Palma in the Canary Islands uses orange spectrum lights for all public lighting to protect the resident bat population. If a whole island can manage it, National Grid can implement on a single plant site.
- Surround the boundary with native hedging as a barrier from noise pollution.
- Monitor electro-magnetic fields emitted from the converter site.
- SUDS design must be finalised and agreed.
- National Grid must think about reuse and recycling at the outset of the project, not at the end. A detailed plan must be created to consider how all components will be reused at the end of life of the facility, rather them ending up in landfill like the fibreglass turbine blades.

## Anything else?

# 20. Do you have any other comments about Sea Link to give that you have not previously mentioned?

You could talk about the personal impact this will have on you or you could comment more generally. For example, you could comment on the information in the consultation document, e.g.:

The red lines on the maps are confusing. The key indicates that they are the 'Draft Order Limits' but there is no explanation of what this is. I am aware that there are protected woodlands and ancient monuments, but these are not clearly outlined. In addition, although the maps do show a number of important marine and coastal areas, they do not show the Minster Marshes SSSI, and it seems difficult to believe this is an oversight.

#### You could also comment on the construction as they have not provided a free text box, e.g.:

Given the size and scope of the Sea Link project, the construction phase is clearly going to have and is already having a negative impact on the area (initial surveys and boreholes) and in particular upon the unique biodiversity and the much-projected marine and SSSI environments.

There is no mention of this in the documentation which is worrying. Bringing materials alone onto site will have a negative impact. Indeed, the surveying has resulted in damage to access roads, hedgerows, fields, grass and scrub areas as well as disruption to the wildlife that is not normally subjected to these activities. You anticipate construction will take four years. The temporary construction areas that would be created to hold the plant and construction materials together with the roadways, temporary or otherwise, would do untold damage beyond the site footprint itself. Wildlife once displaced from this area will be unlikely to return. Construction will involve a massive amount of earth moving and materials, while creating noise, dust and light pollution as well as traffic not normally associated with this area. It is hard to see exactly how mitigation is possible and how the existing wildlife will survive sadly.

## **Questions 21 to 26**



These questions are about the consultation process. Please answer however you like.

## Questions 27 to 30

These questions are equality and diversity questions.

Please remember to copy your answers into a Word document or other file if you would like a copy of your response. National Grid will not enable you to download your completed form.