

Sent: Sunday, August 11, 2024 1:34 PM

Subject: Sealink

Dear Sir or Madam,

I am writing to support our local councillor Becky Wing's letter below.

The Sealink project seems to have selected the cheapest route rather than the best.

Please give these concerns the attention that they deserve, for all of our benefits.

I'm sure that you can find a better solution.

Yours sincerely

Mark Emmett

Dear Sir or Madam

I am writing to you in relation to the proposed Kent Sealink DCO application following a further round of consultation and what appears to be some very significant changes to the original presentation. This newly published update to the National Grid Sealink proposal has raised a number of further serious concerns. Knowing the area very well and also simply taking a look at any topological map you will see that the development will be based on land prone to flooding. Indeed, it is called the Minster Marshes and as such is waterlogged all year round with most of the land being no higher than 1 or 2 metres above sea level. A simple drive past or visit demonstrates how problematic this land will be to build upon. National Grid's own documentation clearly states that marshland or boggy land is not suitable for these types of projects and as a result, this development is now forced to raise the height of all structures by an additional 2 metres. The following applications submitted to Thanet District Council in relation to the a BESS Plant: F/TH/20/1467, F/TH/21/0305 and F/TH/24/0034, the last of which is still to be determined, demonstrates how difficult the land is for many types of developments where water could create serious concerns. This development has also had to be raised by 2m across the entire site, in addition, their initial plans to use a system of SUDs to manage water was not possible. Why would it be given the shallow nature of water across the entire area. The raising of the site for the Sealink project will therefore require many thousands of tons of aggregate, raising the following concerns:

1. How will this be brought to site?
2. Where will this aggregate be sourced?
3. Will the aggregate be free of all forms of contamination?
4. How will the run off through and over this imported material, not native to the area, impact on the hydrology of ground water and the hydrology of the Marshes, the SSSI, Minster Stream and River Stour?

During the members briefing to TDC Councillors the Sealink Team were asked how the run off from a building of considerable size and associated infrastructure which is not porous, will be managed. The initial answer was the creation of pools/ponds but when challenged about how this will be achieved given the shallow water, they stated, that these pools/ponds would be built above ground. I am assuming that will also mean the base of these pools/ponds will also need to be raised at least 2 additional metres! Sadly this was not clear and neither was the information relating to the amount of run off that would have to be managed or how the system would cope with climate change in such a low lying area that is already saturated. When asked what would they do with excessive run off, the response was, it will be released into the Minster Stream. They were made aware of the presence of the European Eel, which is critically endangered. Again, no consideration seems to have been given

concerning the possible negative impact of larger amounts of water or the potential change in pH due to the introduction of aggregates upon land and water based biodiversity.

It is also very concerning that in order to make this marsh-land viable for this project that there will be, a requirement to use 'pile drivers' in the hope of finding and/or creating a stable platform to build on. This is flat land where noise and vibrations will carry, not only through the air but through the saturated marsh land. There appears to be little concern expressed for the existing biodiversity or indeed the residents and businesses of Cliffsend and Minster, this proposal will require 1000's of lorry trips to and from the site that will create excessive disruption and require further damage to existing environments.

The sites location is problematic, not least the real potential for flooding and the range and extent of greatly protected marine and landbased environments, on and close to the site. Sadly, the Sealink Team do not appear to be interested in the widerange of wildlife and habitat on site and in the area, including those with high levels of protection; Grey Herons, Little Egrets and Nightingale for example or indeed residents and businesses. The updated plans also seem to mean the cutting of a road through the woodland at the top of Jutes Lane but sadly there seems to be absolutely no mention of how the loss of this valuable mature woodland will be mitigated. Tree coverage in Thanet is 4.4%, one of the lowest in the world and as such the loss of woodland needs to be seriously acknowledged, considered and mitigated for, better still avoided

The loss and impact on wildlife does not seem a key concern for Sealink who appear at best dismissive of it and at worse are failing to undertake prolonged surveys. Given the significance of the area, much data is available and continues to be collected by stutory bodies and locals with expertise and interest in the area and yet little attempt by Sealink has been made to reach out to these organisations/people, to gain a more accurate understanding of the wildlife that exists. The proposed converter site appears to cover a dyke and scrub hedgerow an important area where the ringing of birds takes place on a regular basis, where Brown Hare and Badgers feed, all of which needs to be appropriately mitigated for and prior to any serious work begins, if the DCO is successful. Key areas have been identified and at the members briefing they were described as farmland and an existing strip along the river, the latter of which would simply be 'enhanced', so not in fact a new area of mitigation! There was no mention of what the impact would be on the loss of farmland for farming in the area, or indeed how the loss of farmland for mitigation would in itself be mitigated for, or indeed whether the farm would be viable without this land?

As a Thanet District Councillor, I was relieved to see that the CEO had ruled out the use of the old Pegwell Hoverport which is another exceptional wildlife site, this summer I was lucky enough to see both Lizard orchids, one of the rarest in the UK and Pyramid Orchids in this location, while walking my dog. Something this development will also mean locals and visitors will not be able to do! I got the feeling that the Sealink Team simply viewed this as somekind of 'industrial wasteland' instead of a rich area of increasing biodiversity! The marine area also seems to have doubled in size as indicated on the plans and now includes almost the entire area of Pegwell Bay, a national and international site of marine importance. When asked why this was needed the response was to 'anchor ships/vessels', there was no comprehensive answer suggesting this expansion was not properly evidenced. The anchoring of ships/vessels also begs the question concerning damage to the seabed and potential pollution from fuel and other waste materials. This bay is frequented by both grey and common seals who are regulars on the River Stour close by and as such Pegwell Bay is not a suitable site for the anchoring of ships/vessels and no information was presented as to what the function of these ships/vessels would be.

One area that the SeaLink team and the previous and new proposals seem to pay no attention to is the 'cumulative impact' of the various developments already operating, approved yet to be build or submitted to Dover Distict Council, Thanet District Council or Kent Country Council. These are many and varied with some presenting a considerable fire risk. The 249 MWh Bess Plant that is close by resrepresents just that, a facility sadly approved, the first 2 phases of which are now operational and built partly on land with a flood risk level of 2/3. Of course the facility has been raised 2m to address this. BESS fires are not easy to put out as the Significant Incident Report of the BESS Fire in Liverpool in 2022 indicates, they are an emerging battery storage technology. This BESS site was just 20MWh and defensive firefighting had to be used for a considerable length of time. As a result, I have two serious concerns relating to the consequences of the cumulative impact of the combined developments at and around the Richborough Site:

1. How will Fire Safety be addressed at the Sealink Site and what assessments if any, will be undertaken to consider the combined Fire Safety across the entire Richborough Site and beyond. For example, if a fire breaks out in the nearby BESS Plant, Solar Farm or Grid Stability Plant, how could this impact on the Sealink facility and how would fire spread be addressed? Have or will these senarios be looked at, have or will this involve the other owners and/or operators of the various developments and will there be a shared Fire Risk management plan for the entire Richborough site and beyond, to ensure the environment and nearby residential and business properties, towns and villages are protected from fire, toxic fumes and toxic water.
2. The proposed site is an area of increased flood risk, to date the land has acted as a large 'sponge', naturally soaking up water in periods of heavey rain and exceptional hightides. I was able to witness this, as described by the KCC Sandwich Town Tidal Defences document August 2016, when 'the biggest tidel surge in 60 years hit the east coast on Friday 6 December 2013'.This affected the entire area but there was room for the water to go, to sit and drain naturally and the Minster Marshes played an important role in helping avoid a catastrohic event. The Environment Agency were also able to deloy flood defences preventing serious flooding over the course of 3 exceptional high tide and the storm serge. The covering of large parts of the Minster Marshes as well as Richborough with aggregate to raise the land, buildings and other infrastructure which is not porous, will create excessive rain run-off, as well as reducing the role of this land in soaking up water naturally. This run-off water will now need to be managed if flooding directly on site and away from the site is to be avoided. Add to this a warmer and wetter climate, as well as rising sealevels, which will also affect ground water levels, as a consequence of global warming, then it is essential that the combined affect of all developments at and around the Sealink site is properly evaluated. There is real concern that this cumulative impact will result in increased flooding at the site and away from the site, putting Minster Village and the Weatherless Sewage Treatment site at greater risk than they already are, as well as overwhelming the Minster Stream and River Stour, as all developments will be discharging into these.

It was also quite alarming at the member's briefing that the Sealink Team appeared to speak in a way that suggested, 'this was a done deal', concern for the impact on the environment was certainly not a key focus and information on the screening out of alternative sites 'glossed over'. This development will result in 4-years of constant disturbance, in what is presently a quiet tranquil place of great biodiversity, close to greatly protected land-based and marine environments as well as Richborough Fort a site of significant heritage and the villages of Cliffsend, Pegwell and Minster. The size and scope of the buildings, above surface pools/ponds, pylons, the existing ones of which have already resulted in the death of over 170 mutt swans in a single event, is simply 'mindblowing'. It will sit in a low-lying area and as a result will be seen for miles.

Given also that the Sealink Team mentioned the port of Ramsgate and will have a need for considerable amounts of aggregate, it may also impact on the people of this town, as lorries make

their way from the port to the Minster Marshes. The impact on tourism a key economic driver for the area has not been explored at all. 4-years of blocked roads, construction work, restricted areas, footpaths closed, loss of environment to explore has simply not been fully explored.

In summing up, the Sealink Team could not have picked a more inappropriate place due to its environmental importance, land-based and marine biodiversity, access, potential on site and off site flooding, cumulative impact of a number of developments close by, noise, visual impact, migrating bird strikes on pylons, proximity of villages/towns as well as the lack of opportunities for meaningful and appropriate mitigation.

As a Green Councillor, I should be supporting the drive for clean energy but have found myself shocked and horrified at the disregard shown for the impact on the environment and communities as well as a complete failure to consider cumulative impact of numerous developments in close proximity, or indeed the scoping out of alternative sites and the choosing of cheaper options, for example pylons as opposed to underground cables. From the outside looking in, it appears to be some kind of 'green-energy' rush, with little forward planning and collaboration between the various developments on site, indeed, we already have a NEMO connection, why was this project not scoped at the same time as this? I have real concern that the combined development in the area and the fact the area is a floodrisk area, evidenced by the need to raise the height of buildings and infrastructure, that it is a site that is fast becoming a 'recipe for disaster', that the environment, biodiversity and communities will pay for now and later if there is a serious incident of flooding or fire event.

Kind regards

Cllr Rebecca (Becky) Wing
Central Harbour Ramsgate