

Date: 7th October 2025

CPRE Kent - The Countryside Charity
CPRE Kent, Queen's Head House,
Ashford Road, Charing,
Kent
TN27 0AD

Ms Sarah Holmes

Lead Panel Member for the Examining Authority
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

By email

Dear Sir/Madam,

ID FDBB4E979 - CPRE Kent's response to the Rule 6 letter regarding the examination procedure and draft examination timetable.

CPRE Kent wishes to comment on the proposed examination procedure and timetable as set out within the Rule 6 and Rule 9 letters issued by the Examining Authority (ExA).

We note from paragraph 19 of the Rule 9 letter (EN020026-000845, 25 September 2025) that the applicant intends to submit a change application in November 2025, accompanied by revised versions of all key application documents including the Works Plans, Land Plans, Book of Reference, Statement of Reasons and draft DCO [AS-138]. As far as we can determine, no definitive date has been fixed for the submission of this material. The ExA further indicates that the proposed changes are to be considered as part of the first written questions, to be published on or before 17 December 2025, with all Interested Parties expected to respond by Deadline 3 (7 January 2026).

In our view, this timetable is wholly unreasonable. This will be the first point at which Interested Parties such as ourselves will have sight of the applicant's revised case, yet we would be required to analyse, interpret and respond to it within a matter of days over the Christmas and New Year period. As a volunteer-led charity representing the views of our members across Kent, it is simply unrealistic to expect a considered and properly evidenced response to what is likely to amount to a wholly new

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body of technical material within that timescale. We therefore respectfully but firmly request that Deadline 3 be extended by a minimum of one week, to ensure a fair opportunity for engagement and to avoid disadvantaging community and voluntary participants in the process.

We also wish to reiterate that CPRE Kent, alongside many other organisations, has consistently raised concerns as to whether this application was ever ready for submission. As a co-signatory to the letter sent by Kent Wildlife Trust and the undersigned organisations dated 27 August 2025 (document AS-077), we have already urged the applicant to withdraw the current application on the grounds that it was incomplete and procedurally deficient. That joint correspondence set out in detail the extensive documentary errors, survey gaps and consultation failures which, in our collective view, render the submission unfit for examination. The applicant's continuing need to introduce further substantive changes at this late stage only reinforces those concerns. In light of this, we again submit that the more appropriate and transparent course of action would be for the applicant to withdraw the present application and resubmit one that is genuinely complete and ready for examination, rather than attempting to retrofit fundamental alterations during the examination process itself.

Finally, with respect to the conduct of issue-specific hearings, CPRE Kent requests that each of the principal issues identified within our Relevant Representation (including the failure to justify the needs case, inadequate consideration of alternatives, failure to apply the mitigation hierarchy, ecological and biodiversity impacts, landscape and dark-sky harm, loss of Best and Most Versatile land, flood-risk deficiencies, and the use of overhead lines) be afforded issue-specific hearings within the timetable.

Whilst CPRE Kent will be registering to attend the preliminary meeting, this will simply be to reserve our position should the above issues be discussed.

Yours faithfully,



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