

Date: 7<sup>th</sup> October 2025

Ms Sarah Holmes

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



By email: [southeastanglialink@planninginspectorate.gov.uk](mailto:southeastanglialink@planninginspectorate.gov.uk)

Dear Ms Holmes,

**RE: Kent Wildlife Trust F0B50218B – Response to the Rule 6 Letter (EN020026), Procedural Deadline A: Comments on the draft examination timetable and arrangements for future hearings**

Kent Wildlife Trust (KWT) welcomes the opportunity to comment on the Examining Authority's (ExA) Rule 6 Letter and draft Examination Timetable for the Sea Link Project. However, KWT continues to have serious concerns about the readiness of the application, the fairness of the proposed timetable, and the accessibility of the examination arrangements. Our key concerns and recommendations in relation to the draft timetable, the structure of hearings, and the integrity of the process are outlined below.

**Comments on the Draft Examination Timetable**

KWT notes that, under Annex D of the Rule 6 Letter, the ExA intends “*to maximise the time available to examine the application*” by requesting Written Representations (WRs) and Local Impact Reports (LIRs) at Deadline 1 (Tuesday 18 November 2025). In our view, this is premature and unrealistic given the volume of information, complexity of the documentation, and the outstanding deficiencies already acknowledged by the ExA and other stakeholders. Many consultees, including local authorities and NGOs, will still be awaiting clarification and revisions from the Applicant, including those related to the anticipated change application in November 2025. Requiring substantive WRs and LIRs before those documents are available risks producing incomplete or inaccurate submissions and undermines the transparency and effectiveness of the process. We therefore urge the ExA to reconsider the timing of Deadline 1 and to defer the submission date for WRs and LIRs until after the Applicant's revised documentation has been published with a sufficient amount of time to be properly reviewed by Interested Parties.

Likewise, Deadline 3 (7 January 2026), the date for responses to the ExA's First Written Questions, also requires extension, given the impracticality of reviewing and responding to a significant body of new material over the Christmas and New Year period. This deadline is wholly impractical when many organisations, including statutory bodies, local authorities, and environmental NGO's, operate with reduced hours, staffing and limited capacity during this period. Given that the Applicant intends to submit a substantial change application in November 2025, accompanied by a complete suite of revised documents (including updated Works Plans, Land Plans, Book of Reference and Statement of Reasons), it is highly likely that the first written questions will relate directly to new or materially altered information. Interested Parties would therefore be required to review, interpret, and respond to an entirely new and

technically complex evidence base within only a few working days following a major public holiday period. For KWT and other voluntary or charity-based consultees, this compressed timeframe would make it impossible to provide properly evidenced, robust responses to the ExA's questions, responses which form a key component of the written examination process. Proceeding on this basis risks excluding smaller, non-profit participants from effective engagement and would compromise the fairness and transparency of the Examination.

### **Integrity and Readiness of the Examination**

As set out in our joint letter with other organisations (AS-077), the Sea Link application continues to suffer from substantial procedural and evidentiary shortcomings, including:

- Incomplete and inconsistent environmental documentation;
- Gaps in ecological survey coverage across both marine and terrestrial habitats;
- Lack of a functional In-Principle Monitoring Plan (IPMP); and
- Unresolved concerns regarding HDD feasibility and risks to groundwater and protected habitats.

The ExA's own correspondence confirmed that these issues remain outstanding. Proceeding to Examination without resolution would risk undermining the objectives of the Planning Act 2008, which seeks to ensure that Nationally Significant Infrastructure Projects are examined on the basis of complete, robust, and reliable evidence. Accordingly, KWT and our partner organisations maintain that the appropriate and transparent course of action remains for the Applicant to withdraw and resubmit the application once the necessary surveys, assessments, and documentation are complete.

### **Arrangements for Future Hearings and Use of Virtual Methods**

KWT recognises the practical need for flexibility in hearing formats but emphasises that in-person hearings within affected localities are essential for fair participation and accessibility. While virtual attendance can support inclusion, it should not replace face-to-face opportunities for local communities and stakeholders to engage directly with the process. We therefore request that:

- Issue-specific hearings on ecology, biodiversity, and marine environmental matters be held in-person in Kent, with hybrid access for remote participants;
- Virtual methods be reserved for procedural or technical sessions where appropriate; and
- Adequate notice, technical support, and timely publication of recordings and transcripts be ensured to facilitate equitable participation.

We also request that our main concerns and key issues identified within KWT's Relevant Representation are afforded issue specific hearings within the Examination timetable. These include:

- Assessment of Alternatives
- Mitigation Hierarchy
- Cumulative Impacts
- Inadequate Ecological Data and Transparency
- Impacts to Biodiversity
- Protected Species
- Benthic Ecology
- Compensation and Mitigation

- Biodiversity Net Gain

KWT remains committed to constructive engagement throughout the DCO process but believes the Examination should proceed only once the application is procedurally sound, evidentially complete, and accessible to all stakeholders and to ensure that the process remains transparent, proportionate, and fair to the communities and environments affected.

Your sincerely,

Emma Waller  
Planning & Policy Officer, Campaign Lead Rethink Sea Link  
**Kent Wildlife Trust**

