

Sea Link – Written Representation on Compulsory Acquisition of Hoverport Land

Executive Summary

I object to the applicant's proposal to compulsorily acquire additional land at the former hoverport in Pegwell Bay as set out in the Change Request dated 26 November 2025. This land lies within internationally designated sites (SSSI, SPA, SAC, Ramsar) and its acquisition is unnecessary, disproportionate, and contrary to statutory obligations. The applicant has not demonstrated that this land is essential for the project or that harm to protected habitats can be avoided. I urge the Examining Authority to reject this element of the Change Request and require alternative arrangements that do not involve acquiring land within designated sites.

Why This Land Acquisition Is Problematic

Location within Protected Sites

The hoverport land is part of a highly sensitive ecological area, including saltmarsh and intertidal habitats.

These areas are protected under UK and international law, including the Habitats Regulations 2017.

Lack of Justification

The applicant has not provided clear evidence that acquiring this land is the only viable option.

No assessment of alternative access routes outside designated sites has been presented.

Environmental Risk

Compulsory acquisition would enable heavy machinery and construction traffic to operate within fragile habitats.

Potential loss of up to 3 hectares of saltmarsh and disturbance to SPA bird populations during breeding and overwintering periods.

Policy Breaches

Habitats Regulations 2017 (Regulation 63): The applicant must demonstrate no adverse effect on European sites. This test has not been met.

NPS EN-1 Section 5.3.7: Applicants must apply the mitigation hierarchy (avoid, then mitigate, then compensate).

Acquisition of this land does not avoid harm.

NPS EN-1 Section 4.11.1: Compulsory acquisition should be proportionate and justified. This proposal fails that test.

Cumulative Impact

Pegwell Bay already faces pressure from multiple energy projects.

Adding hoverport land to the order limits compounds ecological and amenity impacts without adequate cumulative assessment.

Constructive Alternatives

Identify alternative access routes outside designated sites, such as existing industrial land or temporary marine platforms.

Limit order limits to areas that do not include saltmarsh or Ramsar-designated land.

Require phased works and seasonal restrictions to avoid sensitive periods for wildlife.

Conclusion

The proposed compulsory acquisition of hoverport land is incompatible with statutory obligations and environmental protection principles. It introduces unacceptable risks to biodiversity and public amenity without clear justification. I request the Examining Authority to:

Reject the proposed acquisition of hoverport land.

Require the applicant to demonstrate alternative access arrangements that avoid designated sites.

Mandate full ecological assessment and robust mitigation before any works proceed.