

Date: 19th January 2026



Dear Examining Authority,

Application by National Grid Electricity Transmission Limited (the applicant) for an order granting development consent for the Sea Link project

Written Representation on Proposed Changes to the Sea Link Development Consent Order

The Council notes that National Grid has proposed 5 changes to the application. The applicant submitted a letter to the ExA dated 26th November 2025 requesting to make changes to the development consent order (DCO) application (Change Request 1 (CR1)). In their letter dated 5th December 2025, and having considered the proposed changes, the ExA confirmed that it has decided to accept all five of the proposed changes for examination.

One of the five changes relates to the Kent element of the Project and therefore whilst the other four changes are noted, we will only comment on proposed Change 1: Change to access at the Hoverport, Kent.

The Examining Authority (ExA), in their letter dated 5th December 2025, has considered Change 1 and made the following comments:

"This change proposes to extend the order limits to provide the applicant with flexibility in the access route that vehicles will use across the hoverport to access the intertidal area at Pegwell Bay. The change will increase the area of the order limits at the hoverport to ensure that encroaching saltmarsh can be avoided. The applicant states that this change would not increase the area used for construction of the proposed development as the vehicles would only use one route across the hoverport (and likely one of the existing ramps); nor would it change the number or types of vehicles accessing the intertidal area. The change would also not introduce any new development or works to the hoverport."

The Change Request: Addendum to Volume 6 Environmental Statement concludes that there would be no new or materially different likely significant effects on the environment from the proposed changes, either alone or in combination.

The Council notes that the Applicant intends to undertake surveys to assess the environmental implications of refining the route of the Sea Link Project.

The applicant highlights that the saltmarsh is a dynamic habitat and can change as a result of natural coastal events, therefore, the existing saltmarsh may be subject to change across

the construction and operation. The applicant considers it beneficial for the ecology of Pegwell Bay for there to be flexibility in the location of the access to respond to the conditions at the time. This flexibility is stated to ensure that National Grid can access and exit the intertidal area safely while still committing to not impacting the saltmarsh. The inclusion of a wider area is not indicated by National Grid that they will utilise a wider area than proposed previously. A preconstruction saltmarsh survey would seek to identify the extent of the saltmarsh habitat to confirm the entry and exit points to the intertidal area during construction so that no impact to saltmarsh occurs.

The Construction Environmental Management Plan (CEMP) Appendix B Register of Environmental Actions and Commitments (REAC) considers the impact on saltmarshes and confirms that in terms of the hoverport, the locations and widths of access routes across the mudflats will be defined post consent and will be informed by a pre-construction saltmarsh habitat survey. The Council notes that the REAC will be secured by Requirement 6 as Appendix B to the CEMP.

Having regard to the Pegwell Bay Construction Method Technical Note Version B issued in December 2025 (REP2-011), the Council notes the type of construction plant and vehicles outlined to use the construction access from the hoverport and the confirmation that no construction plant or vehicles will be stored on the hoverport. It is noted that vehicles would use the construction access up to four times a day (depending on tides) and there may be a requirement for up to 40 movements per day at peak times.

As highlighted above, the access route has not yet been determined and the Council is concerned that the ramifications of using (the identified) vehicles to travel over the site (and in the number proposed) are not fully understood. Survey work has not been undertaken for the project regarding the condition of the surface and having regard to the historic use of the site (contamination from previous maintenance areas on the site), it is not clear what the potential impacts on controlled waters may be from use of the land. As such, mitigation (if required), and the suitability of any such mitigation cannot be determined and assessed, at this stage.

Contamination is generally addressed through the REAC document and the comments are noted. In terms of potential contamination of the water environment from fuels, oils and chemicals, it is unclear what mitigation would be in place to avoid impacts from fuel spillage and prevention of site runoff on the Hoverport site specifically, in regard to vehicles travelling over the surface, and associated risk given the condition of the surface.

The Council considers that further details in relation to mitigation to avoid contamination of the water environment using the hoverport access should be included in the Onshore Construction Environmental Management Plan (CEMP), with an updated REAC provided prior to determination of the Development Consent Order.

The impact on the former hoverport with regards to ecology has been considered within the CEMP Appendix B Register of Environmental Actions and Commitments (REAC). This states that to ensure ecological interest features of the former hoverport are not affected during construction a pre-construction botanical survey will be undertaken to map vegetation stands of particular significance to protect and an access route will subsequently be marked out which avoids these stands, along with dense stands of other vegetation. It is noted that a

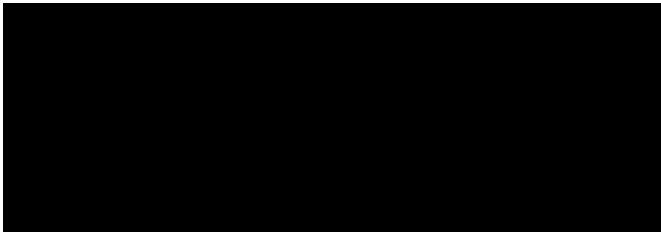
suitable qualified ecologist will be on site to supervise and guide the marking out of the access route.

Should the survey work undertaken at the hoverport indicate that all routes would result in the diminishment of significant botanicals, the Council queries whether the access route would be determined on a hierarchical basis and if so what the criteria would be. The Council seeks confirmation that the findings of survey work would be shared and wider consultation with the relevant bodies, beyond the qualified ecologist present on site, undertaken if necessary, to determine the most appropriate access route to minimise ecological harm.

In terms of recreation, the applicant states that not all of the new area will be used for access purposes and as such impacts on recreational receptors using this area will be minimised, whilst the proposed change does not bring the works significantly closer to any other environmental receptors and therefore does not result in any new or different significant environmental effects. The Council has outlined its concerns previously with regards to the impact of the proposed development on tourism and recreation and these comments remain valid.

The Council also notes that the proposed change to access at the hoverport results in National Grid seeking to gain right of access to more land via the compulsory acquisition process. Discussions concerning the potential acquisition of land within the Thanet District are ongoing and it is noted that the Council will have further opportunities to respond to the proposed changes. The Council will be represented at the Compulsory Acquisition Hearing (CAH1) on Tuesday 27th January 2026.

The Council would welcome the opportunity to comment on any updated submissions from the applicant in due course.



Planning Applications Manager