[redacted]@nationaltrust.org.uk
Direct line: [redacted]
28 January 2026

National Trust

Planning Inspectorate

Dear Planning Inspectorate,

Application by National Grid Electricity Transmission (NGET) for Sea Link
The Examining Authority's written questions and requests for information (ExQ1)
Issued on 17 December 2025

Response from the National Trust

With our staff, members, volunteers and supporters, the National Trust is the biggest conservation charity in Europe. We protect and care for places so people and nature can thrive. Many millions share the belief that nature, beauty and history are for everyone. So we look after the nation's coastline, historic sites, countryside and green spaces, ensuring everyone benefits. For everyone, for ever.

1ECOL5. Biodiversity net gain measures – Kent landfall

Q. Noting that National Grid Ventures is a separate legal entity to the applicant, can Kent Wildlife Trust (KWT) explain whether there are any measures that could be taken to reduce the residual impact of the National Grid Ventures Nemo Link works at the landfall site or to enhance this land. Local authorities to also provide comment.

A. The National Trust has reviewed Kent Wildlife Trust's response (08.01.2026) to 1ECOL5 and agree in principle with the issues identified. Saltmarsh a priority habitat, remains significantly degraded eight-years post-construction of the open-cut trenching for the National Grid Ventures project. The lack of evidence referred to within KWT representation is also of significant concern and undermines the purpose and implementation of planning conditions and marine licence conditions to the detriment of the environment at Pegwell Bay. The Venture project has compromised the overall integrity of the saltmarsh habitat,

showing that disturbance to saltmarsh from cable landfall works can take decades to recover and, in some cases, may not recover at all without active intervention resulting in adverse impacts to biodiversity.

KWT identify the need to set up a saltmarsh recovery working group to support the development of a restoration and ongoing monitoring strategy to address the ongoing residual impacts from the Nemo Link works. The Trust support this approach, and it should incorporate the whole stretch of Pegwell Bay.

The Trust strongly support the point made by KWT that habitat restoration or remediation associated with the Nemo Link landfall must not count as Biodiversity Net Gain for the Sea Link project and should be clearly distinct separate entities as this would not provide the additionality required.

IECOL6. Former hoverport (Kent) – species surveys

Q. The applicant's responses to selected RR responses [REP2-022] notes that terrestrial invertebrate surveys (such as for the fiery clearwing moth and Sussex Emerald) were not undertaken at the hoverport site due to lack of access agreement but the open tarmac and hardstanding areas through the site are sufficient for vehicles to access the intertidal area without vegetation clearance. No detailed botanical surveys or reptile surveys have been undertaken at the site, presumably also due to access arrangements. The site has been identified as hosting invasive, non-native (INNS) plant species and being potential reptile habitat. Can the applicant:

• Provide an annotated aerial photograph showing an indicative vegetation-free construction traffic route.
• Explain whether any works would be required to reinforce the access route.
• Confirm how, in the absence of surveys for reptiles, effects on reptiles can be ruled out and any special measures that might be required to avoid effects on reptiles from construction traffic.
• Explain whether as a mitigation or enhancement measure, INNS could be managed at the site as part of the Sea Link proposals.
• Explain whether NE, KWT or Thanet District Council (TDC) would be consulted on the access route. These organisations may wish to comment on the need for consultation on a route.

A. Protected and Priority Species exist on the former hoverport (Kent) site, and it is therefore unacceptable to plan for construction access routes at this location having no understanding of the full botanical baseline, which should include foodplants. The Trust has reviewed the appended invert survey and regard it as inadequate overall. Also, the consultant used does not appear to be a Member of the Chartered Institute of Ecology and Environmental Management (MCIEEM). Whilst the suggested mitigation for Fiery Clearwing and Sussex Emerald in the Environmental Statement is acceptable in principle, it has failed to account for the risks (highlighted by KWT) that the foodplants of these species occur in cracks in the

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hardstanding itself. Without detailed survey data, impacts on protected species and habitat loss cannot be ruled out.

1ECOL10 Bird diverters

Q. Paragraph 2.10.2 [REP1-049] notes that bird diverters would not be fitted to existing overhead lines. It is not the applicant's intention to do this for existing lines. Does NE consider that there is any need for additional diverters to be fitted to other lines in the area in light of the new mixed wirescape? KWT to also provide comment.

A. The National Trust agree with the response provided by KWT

1ECOL23 REAC provision B45 – impacts on breeding birds from OHL and pylon installation

Q. Provision B45 of the REAC [CR1-043] references works above 60dB. The ExA considers that specific noise indices should be stated to make this provision clear. The ExA also notes that the provision retains the option for works to occur during two months of the breeding season. KWT and NE are requested to comment on the appropriateness of this provision and whether any particular two months during this period would be preferable.

A. The Trust agrees with the KWT response.

iCofferdam construction/HDD exits and trenching on the mudflat and cable pull in sites are all within NT ownership. The track to the worksite from the hoverport appears to only cover approx. 50m of NT land; the additional access track for the cable pull in, appears to be outside of our boundary but joins in at the worksite -See link to map document in 1ECOL25 below. Most of the 'pond' behind the saltmarsh, that the cables go under is outside of NT ownership.

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1ECOL25. REAC provision B50 – disturbance to breeding birds

Q. Provision B50 of the REAC [CR1-043] references March to June as the breeding season. Confirm whether this should read March to September. The ExA notes that provision B65 also references March to June.

A. The applicant (following bird surveys in 23/24) states that *'the overall effect on waterbirds (wintering and breeding) is predicted to be minor and temporary and not significant'* as they did not record any breeding seabirds or waterbirds *'which could interact with the marine elements of the offshore scheme'* and key foraging and roosting of waterbirds was observed to be 350-500m from the proposed works. The predicted works schedule has therefore been solely focussed on avoiding disturbance of red-throated diver - offshore activity Oct-March – *'with a reduced seasonal restriction of 1st Jan - 31st March for landfall cable installation activities'*. Sandwich Bay Bird Observatory offered their *'detailed, long-term tidal surveys'* to the project ecology team but they were not asked for. The SBBO believe that the reliance on WeBS surveys (once a month) is *'not adequate: it fails to account for day-to-day variability, migration pulses, disturbance events, or rare species*.

The Trust agrees with the KWT that the bird breeding season should extend beyond March – June to ensure adequate protection of breeding birds and compliance with environmental legislation.

1ECOL26. REAC provision B59 – impacts on potential frac out

Q. Provision B59 of the REAC [CR1-043] allows for the sharing of an HDD landfall method statement and drilling fluid management plan for information with NE only. Confirm whether other parties such as RSPB and KWT should also be party to this provision. Also comment on whether, in light of the potential for impacts on sites for which NE, KWT and RSPB have responsibility, they should also approve or be consulted on these plans. The provision should be updated to explain when these plans should be made available.

A.

Sharing of an HDD landfall method statement and drilling fluid management plan should include the Trust and other parties including RSPB and KWT

1ECOL29. REAC provision B62 – impacts of HDD on Site of Special Scientific Interest (SSSI)

Q. Provision B62 of the REAC [CR1-043] allows for preconstruction botanical surveys to support monitoring of any impact of HDD. Should this provision be to support 'monitoring and mitigation' of any impact of HDD, since the location of plants might dictate routes of access and priorities for mitigation amongst other things?

A. The Trust agree that preconstruction surveys will inform potential mitigation e.g. on frac out and access for monitoring activities while HDD is in progress. For example, the HDD

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corridor was not surveyed for plants as highlighted, and not for invertebrates either - it is unclear why other than perhaps the likelihood of HDD meant the consultant regarded impacts as negligible - but that does not consider impacts from access and monitoring the HDD. With the exception of a frac out, these are probably minimal, based on the described monitoring as a person walking the route above the drill, but limited evidence provided. Concern would also be if the monitoring is intensified with the use of machinery and equipment and this should form part of a management plan.

1ECOL31. REAC provision B66 – impact on former hoverport ecology

Q. *Provision B66 of the REAC [CR1-043] allows for botanical survey to inform the construction access route within the hoverport and references foodplants of 'rarest vertebrates'. The ExA assumes that this should read 'invertebrates. The ExA requests comment on whether this provision should also include reptile survey and whether the provision could be expanded to more proactively remove INNS as an improvement measure.*

A. This question directly links to 1ECOL6, the Trust agrees with KWT response and emphasises the need for appropriate ecological surveys to be carried out at the hoverport site prior to any construction access route being identified.

1ECOL32 REAC provision B67 – impact on saltmarshes

Q. Provision B67 of the REAC [CR1-043] requires confirmation of an access route across the intertidal area to be defined post consent and informed by surveys. No reference is made to consent or approvals from KWT or NE, should it? The ExA notes that B67 seems to overlap with provision B70, can the two provisions be merged?

A. Scoping and baseline surveys should form part of the Environmental Statement and HRA in the identification of a potential access route which should be consulted and agreed on prior to consent. The construction methodology report specifies that there will be a pre-construction intertidal habitat survey. It is also important that a topographic survey is also undertaken (as recommended by Ken Pye's report to NG: Document 9.20.2: Landfall Sediment Modelling Report Pegwell Bay).

It is imperative that, the National Trust as landowner, is consulted on the proposed cable access route and methodology (vehicles, routes etc) prior to any consent.

1ECOL33. REAC provision B68 – Impact on Pegwell Bay

Q. Provision B68 of the REAC [CR1-043] provides for a Pegwell Bay landfall construction method statement covering the marine cable pull in and cable burial. Should this provision

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include cable excavation and laying in the intertidal area too and is there a requirement for the provision to include consultation and/or approval with KWT and NE?

A. The Trust agree with KWT response that the cable excavation and laying works should be included in Provision B68. Much of the focus seems to have been to avoid impact on the saltmarsh (the saltmarsh is already in a degraded state and eroding and therefore lacking resilience to change). There seems to have been minimal focus on the sand/mudflats, there is functional connectivity between mudflats and saltmarshs and critical components of the SPA, SAC, Ramsar and SSSI which is an omission by the Applicant.

The Trust is concerned that there has been no proper appraisal of the impact of vehicles moving across the intertidal mudflat, with an assumption that any impact will be negated through natural recovery due to the dynamic nature of this zone. However, there is a risk that compaction of the mudflat could occur if there are excessive vehicle movements, which could impact on the mudflat structure and function and affect benthic communities as well as potentially increasing vulnerability of the backing saltmarsh, due to a net lowering of the intertidal. This could affect succession of mudflats into saltmarsh. As such additional measures to avoid or minimise impacts are needed, considering the number and type (including load weight) of vehicles and machinery, frequency of trips and appropriate routes.

The Trust also has concerns regarding assumptions made with respect to the depth of cable burial, with the target being 1.5m and whether this is sufficient to accommodate future lowering of the mudflat and future changes in both the River Stour and tributary channels. Of further concern is across the upper intertidal mudflats and in the vicinity of the HDD exits as reports indicate that the post-installation protection would only be 0.5m below the surface there would therefore be a much higher risk of potential exposure, particularly given the ephemeral development of tributary channels. If this protection becomes exposed a concern would be that it becomes the preferential route for water flow, further increasing the risk of scour and need for additional protection. The appraisals need to consider the operational life of the proposals, i.e. 40+ years. It is recognised that there is considerably uncertainty in this, but a precautionary approach should be taken to minimise the risk that buried cables become exposed, necessitating further protection (possibly use of rock) and additional impacts. Note that in their response, NE advocate for there to be a condition secured for no cable protection placement within the 10m depth contour.

Pre-construction surveys of the topography should be used to inform the final designs, but we should also advocate for long term monitoring of the mudflat and saltmarsh including focus around the disturbance areas (which would also inform future installations in similar environments).

As above we should request that as landowner we are consulted on the final detail designs and method statement associated with the access route. There seems to be some discrepancy in the correction in levels from LAT to OD in the various documents a figure showing a cross-section of cable route relative to current tidal levels and current saltmarsh extent is needed to fully understand the potential implications. [Also of note is that NE response advises that 'either transit of the intertidal is fully established, agreed and

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assessed as part of the consenting process OR a separate pre-construction marine licence will be required'.]

1ECOL34. REAC provision B69 – impact on saltmarshes

Q. Provision B69 of the REAC [CR1-043] requires that trenchless exit pits would be at least 105m seaward from the edge of the saltmarsh, however temporary working areas are stated to be a minimum of 50m from the saltmarsh edge. In light of the potential for disturbance of bird species using the saltmarsh is this a sufficient offset distance?

A. A detailed response is given by KWT, which is considered a reasoned rebuttal of the proposed 50m buffer for the working area from the saltmarsh, from a bird disturbance angle.

The cofferdams may be in place for up to 120 days (4 months), therefore there is a risk that scour (erosion of the mudflat) may occur around the coffer dams, extending the impact even closer to the saltmarsh. The dams themselves may also have a localised impact on the hydrodynamics and therefore on both the mudflat and backing saltmarsh, which does not seem to have been properly explored.

The Trust has not seen any justification for why the HDD exit points are positioned where they are. Highlighted elsewhere the use of different conversions from metres OD to metres above LAT/ metres CD makes it difficult to have confidence in the stated locations, in relation to the saltmarsh and tidal levels. [Note that NE has also queried whether the depth of installation will 'hinder achieving the HDD distance required]

There seems to be over confidence in the extent to which the mudflat can naturally recover. The focus of impacts has been on the installation stage - but there is a risk of further disturbance during the operational stage should cables need to be replaced, repaired or additional protection measures installed (in the case of exposure).

In terms of saltmarsh, Ken Pye's report to NG (Document 9.20.2: Landfall Sediment Modelling Report Pegwell Bay) identified that *'changes in the topography of the upper intertidal flats could induce changes in local wave energy conditions and saltmarsh extent along the southwest side of the former hoverport'.* Avoiding disturbance to this area of potential saltmarsh expansion would therefore be advisable. Ken Pye's report also identifies a potential saltmarsh zone extension up to 2030 and a 50m buffer beyond this, which should be considered a minimum distance requirement.

NE responses advises that *'further assessment of disturbance impacts to Annex 1 birds (foraging, roosting and nesting) and foraging bat species is required in relation to both temporary habitat loss and impacts from lighting and installation works'.* Disturbance to wildlife has focused on noise, but there is also 24hr lighting proposed for the cofferdams and work compounds and areas. The impacts of light pollution must also be assessed to minimise potential disturbance to wildlife whether terrestrial or not.

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1PE2. Pegwell Bay – previous cable installation works

Q. Confirm whether any residual adverse effects from previous cable installation works within the intertidal area have been identified at Pegwell Bay (exclude reference to the saltmarsh and lagoon, which RRs have previously highlighted).

A. The National Trust is in agreement with KWTs response to this question.

1MM4. Updated information

Q. Provide a response to the following updated documents:

- *ES Figures Marine Mammals [REP1-011]*
- *ES Figures Marine Pegwell Bay Seal Survey Report [REP1-013]*
- *Outline Marine Mammal Mitigation Plan [REP1-025]*
- *ES Part 4 Marine Chapter 4 Marine Mammals [REP1-055]*

A. The National Trust own the main seal haul-out locations either side of the Stour. These may be *'a minimum 670m away from any proposed project activities'* according to the Seal Survey Report *(REP1-013)* however seals still must pass closer to the cofferdam location, and barge and cable pull-in/burial locations to get in and out of the Stour. Therefore, there is still potential for noise and vibration and adverse impacts to this species, which should be accounted for within the Environmental Statement.

Yours sincerely

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Planning Delivery Partner

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