



**National  
Trust**

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28 January 2026

Planning Inspectorate

Dear Planning Inspectorate,

**Application by National Grid Electricity Transmission (NGET) for Sea Link  
Response from the National Trust to the Applicant's Response to the Relevant  
Representation of the National Trust – Document 9.34.3 PI reference: EN20026**

*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.*

**Paragraph 4.2.1- Nature Designations**

With regard to the Horizontal Direct Drilling (HDD) impacts on Ecological designations on National Trust Land, much of the focus seems to have been to avoid impact on the saltmarsh (which is welcomed as the saltmarsh is already in a degraded state and eroding, and therefore lacking resilience to change), but there seems to have been minimal focus on the sand/mudflats, ignoring the functional connectivity between mudflat and saltmarsh and also failing to recognise that the mudflats are a critical component of the SPA, SAC, Ramsar and SSSI. A concern is that there has been no proper appraisal of the impact of vehicles and machinery 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, this is a risk that the compaction of the mudflat could occur if there are excessive vehicle and machinery 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 the lowering of the intertidal. This could affect succession of mudflats into saltmarsh. As such consideration of additional measures to avoid or minimise impacts is needed,

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considering the number and type (including load weight) of vehicles, frequency of trips and appropriate routes.

It is therefore recommended that as landowner, the National Trust are consulted on the final details and method statement associated with the cable route and associated access route through the intertidal zone. Of note is the response from Natural England which advises that “either transit of the intertidal is fully established, agreed and assessed as part of the consenting process OR a separate pre-construction marine license will be required”

#### **Paragraph 4.2.2- - HDD Impacts**

The locations of the exit pits are unclear and need to be shown on a location plan with the pits dimensionally referenced (horizontally and vertically) to the MHWS and MLWS. It is also unclear as to whether the exit pits will comprise a permanent buried construction or of if they are simply locations within the cofferdams at the HDD/duct installation and subsequently, the cable installation.

The detailed specifications for the HDD drilling fluid and the duct infill after the cables have been installed needs to be known to form an opinion about their environmental credentials in the circumstances of loss into the marine environment. It is also difficult to form an opinion on the environmental impact and appropriate mitigations in both the construction stages and the longer-term operational phase due to the lack of detail contained within the construction details and method statements. Until these details are defined it is not possible to form an opinion on the adequacy of any remedial plans.

In relation to cofferdams construction, it is noted that lighting will be in place in Q2 2027. However, cable pull through won't be until Q2 2029, so information is needed as to whether lighting will be on for all that time while cofferdams are in situ to protect exit points? In addition, do cofferdams need to be in situ until the cable pull happens with the worksite remaining until cable pull is complete.

In terms of the impact of construction on birds using the mudflats. The additional information supplied by the applicants is considered acceptable but based upon two caveats. Firstly that a Ecological Clerk of Works (ECoW) is in place to monitor all stages of the intertidal work. The ECoW should be suitably qualified to monitor birds and to advise on day-to-day operational matters to reduce impact on birds using the mudflats. Secondly, that the applicant funds a post-construction bird and habitat monitoring programme for five years following construction. This can use the comprehensive information in the Environment Statement as its baseline. It should cover the both the saltmarsh and the offshore intertidal.

The Trust would welcome further discussion with the applicant during the DCO process with us as landowner, the Kent Wildlife Trust as leaseholder and other key stakeholders.

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### **Paragraph 4.2.3 – Visual Impacts (Converter Station)**

The Trust welcomes the approach advocated by the outline landscape strategy which has been prepared and provides for a collaborative approach to delivering landscape and ecological mitigation. In addition, the Trust would wish to be consulted on the detailed Landscape and Ecological Management Plan when submitted for approval to the Local Planning Authority.

### **Paragraph 4.2.4 – Compulsory Purchase**

It is noted that the Applicant is aware of the status of the National Trust Inalienable land status. It is hoped that ongoing discussions between the Trust and the Applicant can secure a voluntary agreement which will negate the need for Special Parliamentary Powers to be engaged.

Yours sincerely

[REDACTED]  
Planning Delivery Partner

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