

Response deadline: 29th April 2026

Our ref: PL00785922

Project: The Sea Link Project

Your Ref: EN020026

Response by: [REDACTED]

Registration ID: [REDACTED]

Inspector of Ancient Monuments

Telephone: 01223 582725

Dear Sir/Madam,

**National Grid (Sea Link) Development Consent Order (Application Reference: EN020026)
Response of the Historic Buildings and Monuments Commission for England (Historic England) to
The Infrastructure Planning (Examination Procedure) Rules 2010 – rule 17 request for further
information and clarifications issued 21 April 2026**

Historic England have been requested to provide additional information and clarifications concerning impact of the Sea Link Project on the Cultural Heritage. The questions outlined in points 5.1 and 5.9 have been specifically addressed to Historic England. Our comments below relate to these points.

Point 5.1 Ebbsfleet Peninsula Multi-Period Complex

Historic England (HE) [REP6-263] has stated that the change to the setting of the Ebbsfleet complex would result in a 'Moderate Adverse' effect, as the magnitude of impact is greater than the 'Negligible' assigned by the applicant. However, HE has stated that the impact to the setting of the complex would be small. Considering the wording of the National Planning Policy Framework and for clarity, would KCC and HE consider the harm to the complex setting to constitute substantial or less than substantial harm?

Historic England Advice

Historic England considers that in the National Planning Policy Framework terms the impact to the significance of the Ebbsfleet Peninsula Multi-Period Complex through changes within its setting would be less than substantial.

We have previously stated that we consider it would be a 'small' magnitude of impact on a heritage asset identified as being of 'high' value. Utilising the applicant's matrix approach for determining the significance of this effect, this could be considered either a Minor or Moderate adverse effect. We have stated that we think the effect would be Moderate, but, if appropriate design is implemented, we think that it would not reach the threshold of being considered a significant effect or 'substantial harm' as defined by the NPPF.

Point 5.9 Land To the South of River Stour Ramsgate Road - Solar Farm

The applicant [REP6-098] assesses that the proposed solar farm at Land to the South of River Stour Ramsgate Road (25/00023) would result in a significant residual effect on Richborough Saxon Shore Fort, Roman Port, and associated remains. It states that both the proposed development and the solar farm would be visible from this heritage asset, but there is no effective mitigation that could be applied by the applicant. The applicant explains that this is because the solar farm causes the greater part of the effect and would result in a significant effect in isolation.

The ExA asks for a response to this from both HE, Thanet District Council and KCC, including whether this changes your overall assessments of the impact to the Roman Fort and whether you agree that the applicant cannot apply any effective mitigation in the circumstances.

Historic England Advice

The information submitted by the applicant [REP6-098] does not change Historic England's overall assessment of the impact to the significance of the Richborough Saxon Shore Fort, Roman Port, and associated remains. Our position on the issue has been summarised in the response to EXQ3 [REP6-263].

Historic England can confirm that we agree with the assessment presented by the applicant in [REP6-098]. We consider that in this particular situation the Sea Link Project cannot apply any effective mitigation in relation to impact to the significance of the designated heritage asset.

Summary

Historic England has provided response to the points raised by the Examining Authority. Statement of Common Ground, to be submitted by deadline 7, will provide further clarity on heritage matters in Historic England's remit.

If you require clarity or further information on any matters raised above, please do not hesitate to contact us.

[REDACTED]

[REDACTED]@historicengland.org.uk