



**National
Trust**

██████████@nationaltrust.org.uk

21 October 2026

By email only to:
SouthEastAngliaLink@planninginspectorate.gov.uk

Dear Sir or Madam

**Sea Link (PINS ref. EN020026) Nationally Significant Infrastructure Project
(NSIP) Application: National Trust Response to the All-interested Parties
Consultation launched 22 September 2026**

The National Trust welcomes the opportunity to comment on the responses provided by the Applicant and other Interested Parties to the Request for Information from the Secretary of State, dated 28 August 2026.

Our response specifically relates to the proposed Kent Offshore and Onshore Schemes within Pegwell Bay, where the National Trust own land, forming part of a wider landholding within the Sandwich and Pegwell Bay area. This includes terrestrial and intertidal areas which fall within the Order Limits of the Proposed Project. It should be noted that our site is managed by Kent Wildlife Trust, who have provided separate representations.

In the National Trust's role as both a landowner and nature conservation charity we have previously expressed concerns that the proposals could affect the internationally important habitats and landscapes around Pegwell Bay, including land within the wider Sandwich and Pegwell Bay National Nature Reserve. During the application process we have maintained a regular dialogue with the Applicant and have sought stronger safeguards for habitats during construction and restoration, and greater certainty about long-term environmental monitoring and mitigation measures. These discussions are reflected in a Statement of Common Ground between National Trust and the Applicant [EN020026-003648-LateD7 Submission-9.65(C)].

Our comments below focus on matters that the National Trust has already raised with the Applicant through the formal consultation process, but where agreement is subject to discharge of post-consent documents or further clarification has been requested further to response to Deadline 7.

National Trust
Heelis
Kemble Drive
Swindon
SN2 2NA
www.nationaltrust.org.uk

Patron: His Majesty The King
Chair: René Olivieri CBE
Director-General: Hilary McGrady CBE

Registered office:
Heelis, Kemble Drive, Swindon, Wiltshire SN2 2NA
Registered charity number 205846

We have reviewed the following documents in the preparation of this response:

EN020026-003862-C1-146 Natural England's formal statutory response to the Secretary of State's Request for Information (RFI) dated 18th of September 2026

EN020026-003623-Late deadline 7 - Copy of EN020026-533366 Sea Link Energy Cable Natural England Risk Issues Log Deadline 7

EN020026-003772-C1-004 Kent Wildlife Trust's Response to the Secretary of State's Request for Information

EN020026-003894-C1-178 Applicant's Response to Request for Information dated 28 August 2026

Reference is made to the item numbers as per the Secretary of State Request for Information, dated 28 August 2026.

Benthic Ecology

Item 3 – Benthic Mitigation Plans

We have previously expressed concern over the potential ecological impact of the scheme on the intertidal and benthic habitats. We therefore welcome the proposal of Benthic Mitigation Plans prior to offshore works commencing and the need for the Applicant to include a timetable for implementation of the mitigation and details of any necessary monitoring. We support the request from Natural England [EN020026-003862-C1-146] that monitoring should explicitly include monitoring of the effectiveness of mitigation measures and agree with Kent Wildlife Trust [EN020026-003772-C1-004] that the plans should provide a robust and enforceable framework that will trigger effective remedial action where required.

Item 4 – Intertidal benthic features of Sandwich Bay and Hacklinge Marshes SSSI

Further to our comments above, we note that Natural England [EN020026-003862-C1-146] has some outstanding concerns from a benthic ecology perspective, as highlighted in their Risks and Issues log [REP7-364]. We are keen to understand how these will be resolved.

Hovercraft

Items 6 and 7 – Hovercraft and definition of 'emergency use'

We have raised concerns regarding vehicle access across the mudflat and use of the Kent hoverport. We were not, however, aware of any proposed emergency use of hovercraft. We therefore welcome a strengthening of a commitment to "*Hovercraft at Pegwell Bay will be on standby and used for emergencies only. It will not be used at any other time during any stage of the project's construction, operation, maintenance or decommissioning. The applicant will report all instances of*

emergency hovercraft use to Natural England and Thanet District Council TDC within 24 hours”.

We support the requests from Natural England [EN020026-003862-C1-146] and Kent Wildlife Trust [EN020026-003772-C1-004] that the definition of ‘emergency’ needs to be narrowly defined and for a hovercraft code of conduct, or emergency ecological management plan, to be prepared and agreed with all relevant interested parties before first use, to minimise adverse environmental effects as far as reasonably practicable.

The National Trust also support the request by Kent Wildlife Trust [EN020026-003772-C1-004] as managers of the Pegwell Bay site, to be notified of any emergency use of the hovercraft, in addition to Natural England and Thanet District Council.

Ecology, Biodiversity and Ornithology

Item 15 – Horizontal Directional Drilling (HDD)

The National Trust note the request by the Secretary of State for the Applicant to explain why Horizontal Directional Drilling (HDD) entry / exit pits at the Suffolk landfall are within the subtidal zone, whereas the pits at the Kent landfall are within the intertidal zone.

Having reviewed the Applicant’s response [C1-182], we are satisfied that it is consistent with information previously provided by the Applicant in discussions with the National Trust.

We welcome the Applicant’s commitment to a seasonal restriction for activities below Mean High Water Springs at Pegwell Bay from November to February to avoid impacts to overwintering birds within the Thanet Coast and Sandwich Bay SPA/Ramsar from disturbance and any indirect effects through impacts to prey species. We also acknowledge the Applicant’s commitment within Condition 15 of the DML to carry out pre-construction surveys, in accordance with the outline In Principle Monitoring Plan.

Item 17 – Amended reference to breeding season dates and supervision by an ecological clerk of works

In our dialogue with the Applicant, we have strongly advocated the requirement for a qualified ecological clerk of works to be present during the construction stage of the project. We therefore welcome Natural England’s response [EN020026-003862-C1-146] regarding this commitment.

However, having reviewed the Applicant’s response [EN020026-003894-C1-178] under this item, we note an apparent discrepancy between the commitments set out in the response regarding the presence of an Ecological Clerk of Works (ECoW) and those previously discussed with the National Trust. In response to Item 17, the Applicant states that “*the presence of an ecological clerk of works or qualified*

ornithologist is only specifically required, in relation to this issue [confirm the absence of qualifying nesting bird features of the SSSI], *during September*” because outside of this period “*noisy work is not permitted*”. Whilst this may be acceptable (we defer to Natural England on this matter), we seek confirmation that an ecological clerk of works will be present during the entire construction period, in line with the Applicant’s response to Item 27 and dialogue with the National Trust. This clarification would ensure there is no ambiguity regarding the level of ecological oversight that will be provided during construction.

Item 26 – Unexploded ordnance

During our discussions with the Applicant, the risk of unexploded ordnance was not identified. National Trust therefore welcomes the inclusion of GG39 within the oCEMP, and the commitment to work with Natural England to ensure that impacts to the Sandwich Bay to Hacklinge Marshes SSSI are avoided or minimised. We note however that Natural England identify that this does not address detonation in situ within the intertidal. We are therefore keen to understand how this risk will be managed.

Item 27 – Ecological Clerk of Works (ECoW) and Environmental Clerk of Works (EnVCoW)

We note that the Applicant has been requested to clarify the circumstances in which an EnvCoW or an ECoW would be used and their relevant powers to ensure that best practice in ecological management would be followed and that relevant ecological mitigation in control documents would be implemented appropriately and have noted the Applicant’s response [EN020026-003894-C1-178].

As discussed above we highlight, however, the risk of ambiguity between the Applicant’s responses to Items 17 and 27 regarding the level of ecological oversight that will be provided during construction.

Item 28 – Saltmarsh survey scope and consultation

We welcome the clarification requests of the Secretary of State and note the Applicant has agreed to update measure B67 of the REAC [REP7-359], which will ensure that the scope of the saltmarsh survey covers the proposed trenchless crossing route as well as the access and egress and that locations and widths of access routes across the mudflats will be defined post-consent in consultation with Natural England, Kent Wildlife Trust and the National Trust.

Item 35 – Revised Marine Chapter 1, Physical Environment [REP7 097] and Marine Chapter 2, Benthic Ecology [REP7-099]

Further to our comments above regarding concerns raised by the National Trust regarding the intertidal environment, we welcome Natural England’s response [EN020026-003862-C1-146], which confirms that updates made to [REP7-098] the Physical Environment and [REP7 100] the Benthic Ecology Chapters have partially addressed their concerns.

We also acknowledge that some details of the scheme, such as widths and locations of access routes at the Kent landfall (between Hoverport and HDD working area), will not be decided until post-consent. Through dialogue with the Applicant we have agreed that these details will be defined post-consent in consultation with Natural England, Kent Wildlife Trust and the National Trust and will be informed by a pre-construction saltmarsh habitat survey.

We are concerned, however, that Natural England's response [EN020026-003862-C1-146] includes reference to "*if HDD proves not to be feasible then we advise it may be necessary to revisit the impact assessments*". To date we have been assured by the Applicant that the current draft DCO prohibits cable installation in Pegwell Bay using techniques that are not trenchless to cross the sensitive saltmarsh and if other than a trenchless technique were proposed at this location, any proposals for alternative methods would require a formal amendment to the DCO and would need to be supported by an additional environmental assessment. We therefore seek reassurance that only Horizontal Directional Drilling (HDD) (or an alternative trenchless method) is covered by the current draft DCO.

Yours sincerely

[REDACTED]
Planning Delivery Partner

National Trust
London & South East

[REDACTED]
nationaltrust.org.uk