THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010

Sea Link Energy Cable

Appendix E3a to the Natural England Deadline 3a Submission
Natural England's Intertidal and Benthic Ecology Advice

For:

The construction and operation of Sea Link Energy Cable

Planning Inspectorate Reference EN020026

19th January 2026

Appendix E3a Sea Link Deadline 3a Intertidal and Benthic Ecology

In formulating these comments, the following documents have been considered:

Sea Link Pre-Deadline 1 Submission Documents

- [AS-006]. 6.3.4.2.D (B) ES Appendix 4.2.D Interim Subtidal Survey Report (Additional Surveys).
- [AS-021]. 6.2.4.2 (B) Part 4 Marine Chapter 2 Benthic Ecology (Tracked Changes) - Applicants response to Section 51 Advice issued on 23 April 2025 - Accepted at the discretion of the Examining Authority.
- [AS-035]. 9.5 Subtidal Survey Report (Additional Surveys) - Applicants response to Section 51 Advice issued on 23 April 2025 - Accepted at the discretion of the Examining Authority
- [PDA-039] 9.21 Sea Link Cable Burial Risk Assessment
- [PDA-037] 9.20.1 Landfall Sediment Modelling Report Aldeburgh

Sea Link Deadline 1 Submission Documents

- [REP1-016]. 6.4.4.11 (B) ES Figures Marine Inter-Project Cumulative Effects (Tracked).
- [REP1-017] 6.4.4.11.A (B) ES Figures Marine Description of Other Projects (Clean)
- [REP1-018]. 6.4.4.11.A (B) ES Figures Marine Description of Other Projects (Tracked).
- [REP1-022] 6.11 (B) Marine Conservation Zone Assessment (Tracked)
- [REP1-024]. 7.7 (B) Marine Biosecurity Plan (Tracked).
- [REP1-028]. 7.5.12 (B) Outline Offshore Invasive Non-Native Species Management Plan (Tracked).
- [REP1-054]. 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology (Tracked).
- [REP1-068]. 6.4.4.2 (B) ES Figures Marine Benthic Ecology (Tracked).
- [REP1-103]. 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Tracked Changes).

Sea Link Deadline 1a Submission Documents

- [REP1A-004]. 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project (Tracked).
- [CR1-009] 2.5.3 Works Plans - Offshore (Version 2, change request)
- [CR1-014] 2.8.3 Statutory and Non Statutory Sites of Nature Conservation Geological and Landscape Importance - Offshore (Version 2, change request)
- [CR1-055] 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement

Sea Link Deadline 2 Submission Documents

- [REP2-035] 9.80 Integrated Geophysical and Geotechnical Survey Report - Extract

Detailed comments

Table 1: Natural England's Advice On: Benthic

Document reviewed: [AS-007] 6.6 Report to Inform Habitats Regulations Assessment (Version B)			
NE Ref	**Section**	**Key Concern and/or Update**	**Natural England's Advice to Resolve Issue**
1	Ex1.4.5	Based on the comments Natural England has provided below; we are unable to agree with the HRA conclusions. We also consider that not all impact pathways of effect on sensitive designated site features have been identified.	Owing to the uncertainty of risks posed by construction and operational activities at the Kent landfall to ecological receptors, we are currently unable to agree with the conclusions of the HRA. We advise that all pathways of effect on sensitive designated site features should be identified and considered. Please see additional comments provided below for explanation. Please see Appendix J3a to Deadline 3a submission on intertidal ecology at the Kent Coast.
4	4.3.45	It is stated that concrete mattresses may be placed at the trenchless entry/exit points in the upper and intertidal mud/sandflat areas at the Kent landfall, and these have the potential to provide suitable substrate for colonisation by INNS. However, we query whether use of a moonpool or prefabricated cofferdam [REP1-108] may also have the potential to introduce INNS at the Kent landfall and, in turn, present a potential impact pathway to designated site features?	Natural England advises that further clarity in relation to the potential to spread INNS is required.

Table 1a: Natural England's Advice On: Benthic

Document reviewed: [PDA-037] 9.20.1 Landfall Sediment Modelling Report Aldeburgh			
NE Ref	**Section**	**Key Concern and/or Update**	**Natural England's Advice to Resolve Issue**
3	Figure 1, and Sections 1.2 & 3.5.2	Further to our Relevant Representation advice [RR-3290], we note that all three HDD exit options appear to be located in areas where Coralline Crag is present yet there is no assessment of potential impacts on the Coralline Crag due to the HDD or cable installation at landfall.	Natural England advises that potential scale of the impacts to the crag needs to be clarified. We also advise that potential impacts on the Coralline Crag due to cable installation and HDD need to be fully assessed and evaluated. Furthermore, we advise that impacts to the

		We draw the ExA's attention to previous energy projects including Sizewell C and East Anglia 1N and East Anglia 2 which have all designed their projects to avoid impacts to this unique irreplaceable geological feature only found in the area around Aldeburgh and Orford. In [AS-114] it is stated that the HDD exit point will target an exit location that will be designed such that there is not a risk of exiting where the Coralline Crag is at the surface. It is also stated that during detailed design, the HDD contractor will microsite the exit points based on seafloor surveys and ground investigations. However, in [PDA-037] it is stated that all 3 potential points will go through the crag, and it is not stated whether drilling through this geological feature may have any impacts on the crag.	Coralline Crag should be avoided and/or minimised when selecting the marine exit site and onwards with cable installation works. And where installation impacts can't be avoided to the crag we advise that there is a further assessment of placement of cable protection in this location due to potential scouring of the feature and disruption to sediment transport.

Table 2: Natural England's Advice On: <u>Benthic</u>

Document reviewed: [REP1-054]: 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology (Tracked) & AS-021: 6.2.4.2 (B) Part 4 Marine Chapter 2 Benthic Ecology (Tracked Changes).			
NE Ref	**Section**	**Key Concern and/or Update**	**Natural England's Advice to Resolve Issue**
1	2.9.16	Updates to the ES chapter suggest that disturbance to intertidal mudflats at Kent landfall will be 'undetectable after a single, or at most, a few tidal cycles.' However Natural England remains uncertain as to whether this is likely as compression impacts upon mudflats can influence infaunal communities, sediment characteristics and trophic functioning (Mawson *et al.* 2026) and recovery seems unlikely within stated timeframe.	Natural England advises that the Applicant should secure appropriate post-consent monitoring in the outline IPMP to ensure full recovery of mudflats agreed by the regulator in consultation with Natural England. Remedial actions should be required in the event that full recovery does not occur
2	2.9.19, 2.9.68,	Natural England welcomes the commitment to conduct pre-construction surveys to inform final cable route design	**Partially addressed.**

	2.10.2	and installation, and possible impacts upon habitats of principal importance are identified, prepare a Benthic Mitigation Plan, in consultation with stakeholders – secured through the REP1-103, 7.5.3.2: CEMP Appendix B Register of Environmental Actions and Commitments (REAC). However, revisions of the document have deleted previous commitment to micro-route the cable to avoid and minimise interactions with any habitats of conservation importance identified during pre-construction surveys. Following the mitigation hierarchy, impacts should first be avoided, before mitigation of impacts are considered.	Natural England requests clarification as to why the commitment to micro-route the cable to avoid or minimise impacts upon habitats of conservation importance have been removed. Whilst commitments to prepare a mitigation plan are welcome, the mitigation hierarchy should be followed which sets out that impacts should first be avoided wherever possible. Securing commitments to avoid sensitive features through micro-siting of the cable wherever possible would resolve this issue.
3	2.7.5	The Applicant has provided additional text providing rationale as to how *Sabellaria spinulosa* count data has been considered when determining the presence of reef. However, Natural England does not consider that sufficient evidence has been provided to support the justification for why the samples did not constitute as reef.	**Partially addressed.** Natural England advises that further evidence is required to support the conclusions of the ES that no *Sabellaria spinulosa* reef was observed by subtidal surveys within the Offshore Scheme
4	2.9.10, 2.9.11	The Applicant has updated the sensitivity assessment for *Sabellaria spinulosa* reef and *Mytilus edulis* beds to 'medium' sensitivity from physical disturbance, as per Natural England's previous advice. This addresses concerns raised within E24 of the R&I log.	Issue can be considered **resolved**.
5	2.7.9	Having, reviewed the updates, Natural England advises that it remains unclear as to the presence and distribution of blue mussel *Mytilus edulis* beds across the Offshore Scheme. In addition, Natural England disagrees with the updates which conclude that blue mussels have been recorded in	**Partially addressed.** Natural England advises that further evidence and clarification of the presence and distribution of blue mussel beds is required to support the conclusions of the ES.

		patches, rather than continuous reef. Insufficient evidence is provided to support this conclusion, and it is advised that the areas in question should be considered to be blue mussel beds, a Section 41 Habitat of Principle Importance, unless demonstrated otherwise.	Natural England also advise that pre-construction surveys to identify the presence and distribution of blue mussel beds across the Offshore Scheme should be secured through the In Principle Monitoring Plan (IPMP).
6	2.9.9	Natural England strongly disagrees with addition of new text which suggests that soft rock habitats (e.g. subtidal chalk and peat and clay exposures) have medium sensitivity to temporary disturbance. Subtidal chalk and peat and clay exposures are considered irreplaceable habitats (Tillin et al. 2022) and will not recover from physical abrasion / removal impacts, in particular. Therefore, Natural England strongly disagrees with the medium sensitivity scores for these habitats of principal importance.	Natural England advises that the document should be updated to reflect the highly sensitive nature of soft rock habitats abrasion and physical loss. Natural England advises that every effort should be made to avoid physical impacts to these habitats where possible. This is particularly the case where habitats support rare and/or irreplaceable communities such as boring piddocks. Where impacts cannot be avoided, we advise that evidence will need to be presented to demonstrate how impacts has been minimised as much as possible.
7	2.7, 2.9.19	Natural England previously raised that the EIA fails to consider potential impacts to 'outcropping clay and soft chalk.' These habitats are protected as Section 41 Habitats of Principal Importance (NERC Act 2006) and are considered irreplaceable (Tillin et al., 2022) Natural England notes that the Applicant has provided additional information to consider impacts upon subtidal chalk and peat and clay exposures (Section 41 habitat). The Applicant has also committed to complete pre-construction surveys to inform final cable route and installation, and prepare a Benthic Mitigation Plan, in consultation with stakeholders. Whilst further information has been provided, Natural England advises that the distribution and extent of outcropping clay or subtidal chalk within the Offshore Scheme remains uncertain.	Consider this issue to be **partially resolved**. Natural England advises that further clarification on the presence and extent of these soft rock habitats would help to inform a quantitative assessment of impacts. Following the mitigation hierarchy, it is advised that impacts should be avoided by micro-siting and other avoidance measures wherever before mitigation measures are considered.

		Natural England also welcomes the commitment to complete pre-construction surveys and, if required, a Benthic Mitigation Plan. However, outcropping clay and subtidal chalk are considered irreplaceable habitats and will not recover if physically damaged.	
8	2.9.56 – 2.9.63	Natural England previously raised that all benthic receptors are highly sensitive to habitat loss and that the EIA should be updated. The Applicant has updated the sensitivity of some habitats to high sensitivity to direct loss, following Natural England's advice. However, 2.9.60 sets out that 'communities on circalittoral rock' (subtidal chalk and peat and clay exposures) and 'subtidal sand and gravels' only have medium sensitivity to physical habitat loss as a result of cable and scour protection, unless they support diverse epifaunal communities. Natural England disagrees with this conclusion and advise that these Section 41 Habitats of Principal Importance have high sensitivity to physical loss of habitat. In addition, subtidal mud has been determined to have medium sensitivity to permanent habitat loss. Natural England disagrees with this, as per previous advice.	Consider this issue to be **partially resolved**, but issues remain outstanding. Natural England advises that the EIA (and where relevant, RIAA) should be updated with a more appropriate evidenced evaluation and assessment of the permanent loss of benthic habitats.
9	2.9.32	Natural England notes the addition of text considering suspended sediment concentration (SSC) and deposition upon features of the Thanet Coast SAC. Natural England's Advice on Operations within the Thanet Coast SAC provides sensitivity scores between 'Medium'	Consider this issue to be **partially resolved**. Natural England advises that the sensitivity information for reef features within the Thanet Coast SAC to 'Medium' sensitivity to suspended sediment concentrations and deposition is updated in line with the precautionary principle,

		and 'Not sensitive' for reef biotopes to smothering and siltation rate changes. Whilst currently assessed as 'Low' sensitivity, Natural England advises that the sensitivity of reef subfeatures should be assessed as 'Medium,' following the precautionary principle, unless further evidence is provided.	unless further evidence is provided regarding the specific biotopes present within the site, and that impacts are mitigated accordingly.
10	Table 2.17 2.9.66	Natural England notes discrepancies between the requirement for rock berms across the length of the Offshore Scheme within updated documents stating an increase from 9.84% to 15%.	Natural England requests clarification on the worst-case scenario (WCS) from rock berms to resolve discrepancy and that documents are updated accordingly.
11	Table 2.17	Additional information has been provided for the assessment of construction works at the Kent landfall site.	Issue can be considered **resolved.** However, issues remain outstanding please see Appendix JB3a of our Deadline 3a submission

Table 3: Natural England's Advice On: <u>Benthic</u>

Document reviewed: **[REP1A-004]. 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project (Tracked).**			
NE Ref	**Section**	**Key Concern and/or Update**	**Natural England's Advice to Resolve Issue**
1	Table 4.17	Natural England notes a substantial increase in the proposed quantity of rock backfill in 'High Risk trench areas' included within document updates, which include changes from 17,100 m^2 to 45,600 m^2 (increase of 167%). Natural England advises this represents a major change to maximum design scenario (MDS) and Project WCS. No justification or rationale has been provided to justify the change. Natural England has concerns for impacts upon benthic receptors from the significant increase in rock backfill.	Natural England advises that justification is required for why the required quantity of rock backfill has increased dramatically. Further information should be provided on where this rock backfill will be placed and the predicted total areas of permanent and/or temporary habitat loss and/or disturbance within and outside of designated sites. Natural England also advises that as part of considering mitigation measures to minimise the impacts the Applicant should also consider the use of cable protection which is more readily removable such as rock bags and concrete

			mattresses. This is particularly a concern within/adjacent to designated sites.
2	Table 4.16	Natural England also notes that the Applicant has refined the cable trench width minimum and maximum parameters by 0.3 m. However, no further changes have been made to refine the Rochdale Envelope to minimise environmental impacts of the WCS.	Natural England advises that further refinement of the Rochdale Envelope is required to reduce environmental impacts and uncertainty.
3	Table 4.13 Table 4.9	Natural England highlights that no changes have been made to reduce ambiguity regarding maximum design scenario (MDS) commitments for sandwave clearance activities. However, Table 4.9 specifies that only one cable trench will be required for the offshore scheme, which indicates that the presented sandwave MDS is for one trench only. However, upon review of the Marine and Coastal Processes chapter (6.2.4.1 (C) Part 4 Marine Chapter 1 Physical Environment (Tracked)) we do not believe this is the only place where sandwave levelling is required. Please see Appendix D3 to our Deadline 3 response.	Further information is required in relation to the proposed sandwave clearance activities due to the ambiguity around the project design MDS. The following issues need to be considered and clarified: • MDS location of sandwave clearance works • Impact pathways for benthic receptors • Location and impacts in relation to protected sites
4	N/A	No additional changes have been made within the Project Description relating to the Project Description to address issues raised within Natural England's Relevant Representations regarding the Project Description.	Issues remain outstanding. Refer to Risk and Issues Log: • Row 2 (E2, E12). • Row 4 (E4, E32). • Row 8 (E8, E52). • Row 9 (E9). • Row 11 (E11, E15). • Row 12 (E13, E22). • Row 13 (E16, E36, E54). • Row 24 (E33).

Table 4: Natural England's Advice On: Benthic

Document reviewed: [REP1-024]. 7.7 (B) Marine Biosecurity Plan (Tracked).			
NE Ref	**Section**	**Key Concern and/or Update**	**Natural England's Advice to Resolve Issue**
1	6	Natural England notes that the updated versions of this document have removed text securing up to date INNS training, biosecurity measures and embedded mitigation measures. Removed text also includes the requirement to report suspected INNS and, if necessary, take action to control present INNS. No justification is provided for why these measures have been removed, which could increase the risk of INNS being spread or introduced by the project.	Natural England advises that clarification is required as to why these measures are no longer considered necessary to restrict the spread of marine INNS.

Table 5: Natural England's Advice On: Benthic

Document reviewed: [AS-035]: 9.5 Subtidal Survey Report (Additional Surveys) - Applicants response to Section 51 Advice issued on 23 April 2025 & AS-006: 6.3.4.2.D (B) ES Appendix 4.2.D Interim Subtidal Survey Report.			
NE Ref	**Section**	**Key Concern and/or Update**	**Natural England's Advice to Resolve Issue**
1	5.7.2	Natural England does not have confidence in the assessment of *Sabellaria spinulosa* reef. It is unclear how the elevation of *S. spinulosa* aggregations has been calculated, which is a key factor in determining whether aggregations constitute as reef (Gubbay, 2007). Natural England also disagrees with the approach taken for defining the extent of potential *S. spinulosa* reef. By assuming a circular geometry of potential reef areas, this introduces a high degree of uncertainty into the assessment	Natural England advises that further evidence is required to evidence the conclusions that no *Sabellaria spinulosa* reefs were recorded during the subtidal surveys. This includes further information relating to the methodology used to inform reefiness and the collected data used to support the report conclusions. Natural England also requests access to the reef and mussel bed assessment sheets as specified within Appendix O. Natural England advises that surveys to identify the presence and distribution of *Sabellaria spinulosa* reef across the Offshore

		of reefiness and is not an approach recommended by Gubbay (2007), Jenkins *et al.* (2018) or Natural England's best practice advice (Parker *et al.* 2025a). Natural England is unclear on the methodology deployed to delineate 'patches' of *S. spinulosa* potential reef from transect data. The extent of patches underpins subsequent area extent calculations and assessment of whether areas comprise of reef or not. However, it is uncertain what criteria have been used to determine discrete patches of *S. spinulosa* (e.g. continuity, minimum length or allowable gaps). Natural England advises that insufficient evidence has been provided to support the conclusions that surveyed areas do not represent reef, and that the precautionary principle should be applied for areas where the presence of reef remains uncertain.	Scheme should be secured through the In Principle Monitoring Plan (IPMP) and pre-construction surveys. Natural England advises that commitments to avoid impacts to Section 41 Habitats of Principal Importance, e.g. micro-siting of cable routes, should be secured.
2	5.7.2	Natural England notes a preference for *Sabellaria spinulosa* reef assessments to follow the approach as set out by Gubbay (2007) and Jenkins *et al.* (2018), rather than the split approach set by Collins (2010) used by this survey report. This concurs with Natural England's best practice advice (Parker *et al.* 2025a).	Please see above comments on determining reefiness.
2	5.7.3	Natural England does not have confidence in the assessment of blue mussel beds. Similar to *Sabellaria spinulosa* reef, Natural England has concerns regarding the extent calculations for potential bed areas. The assumption that potential beds are circular in geometry introduces a high degree of uncertainty into the assessment and therefore is not appropriate for determining which 'Grade 1' areas are considered to be Section 41 blue mussel beds or not	Natural England advises that further evidence is required to support the conclusions of the Subtidal Survey Report. Natural England also requests access to the reef and mussel bed assessment sheets as specified within Appendix O. Natural England advises that surveys to identify the presence and distribution of blue mussel beds across the Offshore Scheme should be secured through the In Principle Monitoring Plan (IPMP) and pre-construction surveys.

			Natural England advises that commitments to avoid impacts to Section 41 Habitats of Principal Importance, e.g. micro-siting of cable routes, should be secured.
3	5.7.3	It is unclear as to why an approach using semiquantitative SACFOR scale is used to determine the percentage coverage, a quantifiable metric, of blue mussel beds.	Natural England advises that any deviation from best practice is clearly justified.
4	Section 5.	Natural England advises that there is insufficient assessment of soft rock habitats, such as 'subtidal chalk' and 'peat and clay exposures' within the survey report.	Natural England advises that clarification required for the occurrence, distribution and extent of subtidal chalk and peat and clay exposures within Subtidal Survey Report (Additional Survey) is required. In addition, Natural England advises that surveys to identify the presence and distribution of Section 41 soft rock habitats across the Offshore Scheme should be secured through the In Principle Monitoring Plan (IPMP) and pre-construction surveys.

Table 6: Natural England's Advice On: <u>Benthic</u>

Document reviewed: [REP1-068]. 6.4.4.2 (B) ES Figures Marine Benthic Ecology (Tracked)			
NE Ref	**Section**	**Key Concern and/or Update**	**Natural England's Advice to Resolve Issue**
1	Figure 3 within document.	Natural England welcomes the figure: 'Marine Cable Crossings and Areas of Rock Backfill Within the Offshore Scheme Boundary,' within Application Document 6.4.4.2.3. This figure shows areas most likely to require cable protection but does not set out the expected location for remedial works (estimated to be required over 9.84% of the Offshore Scheme). Section 41 Habitats of Principal	**Partially addressed**. Natural England would welcome an updated figure to reflect the 's most likely to require all forms of cable protection, including remedial areas. Presenting this information in combination with Section 41 Habitats of Principal Importance and areas of 'A5.6 Subtidal biogenic reef' would help to provide more insight as to

		Importance are also not displayed within this figure (or another figure). Finally, no habitats recorded under the EUNIS habitat code A5.6 Sublittoral biogenic reefs are presented within the figure. The figure 'Subtidal Habitat Complexes and Annex 1 Habitats Identified Within the Offshore Scheme Boundary' presented within Application Document 6.4.4.2.2 shows a large area of A5.6 in the north of the Offshore Scheme which represents a discrepancy	the impact of cable protection upon habitats of conservation importance. Natural England also advises that as part of considering mitigation measures to minimise the impacts the Applicant should also consider the use of cable protection which is more readily removable such as rock bags and concrete mattresses. This is particularly a concern within/adjacent to designated sites

Table 7: Natural England's Advice On: Benthic

Document reviewed: [PDA-039] 9.21 Sea Link Cable Burial Risk Assessment			
NE Ref	**Section**	**Key Concern and/or Update**	**Natural England's Advice to Resolve Issue**
1		Natural England notes that whilst this is a thorough document which is helpful to inform ecological impact assessments it is written from an engineering perspective and consideration of potential integrity risks to the cables	Natural England advises that this document is used to inform ecological impact assessments as to where cable installed is likely to be challenging i.e. potentially resulting in sub-optimally buried cables which require external cable protection
	5.2	Natural England notes that the Sea Link route crosses both granular and cohesive sediments along with exposures of bedrock (chalk [towards Pegwell Bay landfall] and sub-cropping Red Crag Formation Sandstone [towards Aldeburgh landfall]). which will be difficult to cable through and are likely to require cable protection. We advise that cable protection in these areas have the potential to disrupt sediment transport and effect longshore sediment transport.	Please see Natural England's advice on the REP2-035 and the requirement for further analysis on where cable protection may be required. We also draw the ExA's attention to our comments on the Applicants MCZ assessment. Therefore, we advise that further assessment of potential impacts from the placement of cable protection is done to inform the consenting phase.
	6.4.2	Natural England notes the Applicant states that *'In the route between ~KP 0.600 and KP 2.700, there is uncertainty whether stiff clay may in fact be subcropping Red Crag Formation Sandstone (nearshore geotechnical sampling is*	Natural England advises that further consideration of the locations requiring cable protection is required to inform potential impacts to sediment transport and benthic receptors

		recommended to improve confidence) presence of Coralline Crag at the Suffolk landfall', but there is no discussion on the implications of any technical difficulties of the HDD exit points at this location on benthic receptors and coastal processes.	
	Extracted from figures in CBRA	Natural England notes that there are potential cable burial issues due to bedrock (chalk) which are not clearly presented or discussed in the CBRA, particularly around KP 96 -KP 117. We highlight that this area is close to Goodwin Sands and to the southwest towards the approaches of Pegwell Bay. We therefore highlight that if there is insufficient burial depth here and a need for cable protection then it may affect the sediment transport pathways/processes around here and the benthic receptors of the designated sites. We also highlight that in [CR1 – 009] that areas of potential chalk also align with the widest cable corridor.	Natural England advises that impacts to Goodwin Sands MCZ and coastal designated sites from indirect impacts from the placement of cable protection and potential disruption of marine/coastal processes requires further consideration.

Table 8: Natural England's Advice On: Benthic

Document reviewed: [REP1-022] 6.11 (B) Marine Conservation Zone Assessment (Tracked)			
NE Ref	**Section**	**Key Concern and/or Update**	**Natural England's Advice to Resolve Issue**
1	1.5.24	Natural England notes that it is the Applicant's view that cable protection will be sufficiently low to not disrupt natural processes, but we highlight there is no supporting evidence to demonstrated that this will be the case. Therefore, we are unable to agree with the Applicant's position.	Natural Egland advises that evidence should be provided to demonstrate that the Applicant's chosen cable protection will not disrupt marine processes and impact up the MCZs. And there is a commitment to only allow cable protection to be placed where this can be demonstrated. Equally there should be a commitment to only install cable protection which is readily removable and will be removed at these locations. We also advise that monitoring of residual concerns is included within the outline IPMP and with a commitment to undertake remedial actions if monitoring identifies the need to.

	1.5.25	Natural England advises that we remain concerned in relation to impacts to the Thanet Coast MCZ that infrastructure will remain buried	Natural England advises that a further review of potential impacts to the Thanet Coast MCZ is required over the lifetime of the project.
	1.5.26, 1.5.30	Natural England advises that significance of impacts to MCZ features should be based on the conservation objectives of the site and not an EIA. Therefore, we do not agree with the conclusion of "minor not significant".	Natural England advises that impacts to the MCZ should be assessed against the conservation objectives for the site.
	1.5.27	Natural England notes the impacts to Goodwin Sands MCZ from the placement of cable protection is only considered at cable crossing points and does not take into account the findings of the CBRA [PDA-039]	Natural England advises that further consideration of the potential impacts to Goodwin Sand MCZ from the placement of cable protection is required.
	1.5.27	Natural Egland is unclear what cable protection is likely to be used where. Most assessments are based on WCS of rock protection, but it is stated for cable crossings adjacent to Goodwin Sands MCZ concrete mattresses are proposed which is surprising given the other seabed user risks.	Natural England requests further information and justified rationale on the placement of cable protection and the location.
	1.5.29	Natural England notes that the Applicant note potential for scour where cable protection is placed, but this is not defined. Therefore, we are unable to advise on the significance of this.	Natural England advises that further impact assessment of scour and secondary scour is required.
	1.6.6	Natural England notes that the indirect impacts focus on Suspended Sediment Concentrations and do not include changes to marine/coastal processes.	Natural England advises that further consideration of potential impact pathways is considered.
	1.6.8	Natural England highlights that all comments for Goodwin Sands are also relevant to Kentish Knock East MCZ, (and Thanet Coast MCZ), but to a lesser extent given the greater distance between the impacts.	Natural England advises that the indirect impact pathways are further considered.

Table 9: Natural England's Advice On: Benthic

Document reviewed: [REP1-103] 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Tracked Changes).			
NE Ref	**Section**	**Key Concern and/or Update**	**Natural England's Advice to Resolve Issue**

1		Natural England notes that there is no mitigation commitment for sand wave levelling included within in the document.	Natural England advises that standard best practice mitigation measures should be adopted where impacts from sandwave levelling could impact within MCZs and/or on NERC Habitat features.
	B59	Suffolk Coast HDD	Natural England advises that this commitment is amended so that the final HDD management plan is agreed with the regulators in consultation with the relevant SNCB, rather than it be for our information only
	BE05	Mitigation plan for NERC Habitats	Natural England advises that not only should there be a commitment to agree a mitigation plan for NERC habitats in consultation with relevant SNCB prior to construction, but that unless agreed otherwise impacts to these habitats are avoided.
	BE06	Monitoring Plan	Natural England advises that all monitoring requirements/hypotheses are included in an Offshore IPMP at the time of consent.

Table 10: Table 9: Natural England's Advice On: Benthic

Document reviewed: [REP2 - 035] 9.80 Integrated Geophysical and Geotechnical Survey Report - Extract			
NE Ref	**Section**	**Key Concern and/or Update**	**Natural England's Advice to Resolve Issue**
1		Natural England welcomes the submission of REP2-035 Geophysical and Geotechnical Report. It is helpful in understanding the geology of the soils under the seabed. We note that blocks 1 and 2 have a lot of exposed clay and stiff clay with support the CBRA [PDA – 039]. However, it is not clear how they relate to benthic NERC habitats. Nor does it provide the further consideration of where cable protection is most likely to be required.	Natural England advises that further interpretation of the findings included within this report is required to demonstrate where cable protection is mostly likely to be required and once this is known undertake an assessment of the potential direct/indirect impacts from cable protection on designated sites features, irreplaceable geological features, and NERC habitats.

1.References

Gubbay, S. 2007. Defining and managing Sabellaria spinulosa reefs: Report of an inter-agency workshop 1-2 May 2007. Peterborough: Joint Nature Conservation Committee (JNCC).

Jenkins, C., Eggleton, J., Barry, J., and O'Connor, J. 2018. Advances in assessing Sabellaria spinulosa reefs for ongoing monitoring. *Ecology and Evolution*, *8*(15), 7673-7687.

Mawson, C.H., Webster, A., Fitzpatrick, J. and Ruesink, J.L. 2026. Direct and indirect ecosystem responses to vehicle compaction of soft sediments. *Marine Environmental Research*, 107746.

Parker, J., Banks, A., Fawcett, A., Axelsson, M., Rowell, H., Allen, S., Ludgate, C., Humphrey, O., Baker, A., Copley, V., Farmer, R. and Foote, Y. 2025a. Offshore Wind Marine Environmental Assessments: Best Practice Advice for Evidence and Data Standards. Phase I: Expectations for pre-application baseline data for designated nature conservation and landscape receptors to support offshore wind applications. Natural England. Version 2. 79 pp.

Tillin, H.M., Watson, A., Tyler-Walters, H., Mieszkowska, N. and Hiscock, K. 2022. Defining Marine Irreplaceable Habitats: Literature review. NECR474. Natural England.