



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES  
2010

Sea Link Energy Cable

**Appendix J4 to the Natural England Deadline 4 Submission**  
**Natural England's Comments on Kent Landfall**

For:

The construction and operation of Sea Link Energy Cable

Planning Inspectorate Reference EN020026

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10<sup>th</sup> February 2026

## **Appendix J4 – Natural England’s Advice on documentation related to Kent Landfall**

In formulating these comments, the following documents have been considered in relation to the impacts of the Sea Link Energy Cable on Kent Landfall Ecology:

### **Sea Link Deadline 3 Submission Documents**

- [REP3-077] 9.83 Outline Code of Construction Practice (Tracked)

Please see below the comments from Natural England regarding intertidal and benthic ecology relating to the Kent Landfall.

Natural England notes that due to the submission of this document it doesn’t take account of Natural England advice included within Appendix E3A and J3A submitted as part of our Deadline 3A submission. Please note this document should be updated to reflect advice included within those appendices, but for ease of reading we have reiterated that advice for updates to this document below.

1. Detailed comments

Table 1: Natural England’s Advice On: Kent Landfall - Benthic and Intertidal Ecology

| Document reviewed: [REP3-077] 9.83 Outline Code of Construction Practice (Tracked) |         |  |   |
|--|---------|--|---|
| NE Ref   | Section | Key Concern and/or Update  | Natural England’s Advice to Resolve Issue   |
| 1  | B59     | Natural England advises that the final Horizontal Directional Drill (HDD) Landfall Method Statement (LMS) and Drilling Fluid Management Plan (DFMP), should be agreed and signed off by the regulators in consultation with the relevant Statutory Nature Conservation Bodies (SNCBs). | This commitment should be included on the face of the Development Consent Order (DCO)/deemed Marine Licence (dML) if it isn’t already. Furthermore, these documents should include the final HDD depth and landfall exit pit locations to ensure that potential impacts remain within the parameters assessed at the time of consent. |
| 2  | B60     | Natural England notes the proposed use of spotters for frac-outs.  | We refer the Applicant to advice provided in Appendix J3A of Natural England’s Deadline 3A response and as above at B59 as the use of spotters for frac-outs should be also included within the HDD LMS and DFMP.   |
| 3  | B61     | Natural England notes the proposed use of low-pressure pumps.  | Natural England highlights that this commitment should be updated to ensure that the low-pressure pumps will be handheld only.  |
| 4  | B62     | Natural England note the proposal of surveys to inform the final HDD landfall documents.   | Natural England welcomes surveys, but we advise that these should be used to inform the final HDD landfall docs (B59) and that the surveys specifications should be agreed and signed off by regulators beforehand, in consultation with the relevant SNCB.   |
| 5  | B63     | Natural England notes the mention of ground investigation works.   | Natural England highlights that ground investigation works can have significant impacts/Adverse Effect on Integrity (AEol) in   |

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|    |     |   | their own right and this would be subject to a separate planning permission and/or Marine Licence application.   |
| 6  | B64 | Natural England notes the mention on 'ponds'.   | It is unclear to Natural England what is meant by 'Ponds' in this context. However, we do highlight that just because something is considered to be 'new' does not mean that they can be blanket removed. One would assume that their formation is through natural processes and that disruption of these processes should be avoided.       |
| 7  | B66 | Natural England has concerns that impacts to saltmarsh will not be avoided or mitigated with current proposals. | Natural England refers the Applicant to Appendix J3A of Natural England's Deadline 3A response [REP3A-028] and highlight that we do not believe that what has been proposed is sufficient to avoid impacts to saltmarsh habitats. We also highlight that in all other docs the commitments to avoid impacts to vegetation has been included. |
| 8  | B67 | Natural England does not believe this commitment will be sufficient to protect vegetation.                      | Please see Appendix J3A of Natural England's Deadline 3A response [REP3A-028] for further rationale.   |
| 9  | B68 | Inclusion of the final LMS within the DCO/DML.  | Whilst early engagement through our Discretionary Advice Service on Pegwell landfall is welcome; we advise that the final LMS should be a named plan on the DCO/dML and that this should be agreed and signed off by the regulator in consultation with the relevant SNCBs prior to construction.  |
| 10 | B69 | Natural England is concerned that 50m separation between landfall works and saltmarsh is insufficient.          | Please see further advice in Appendix J3A of Natural England's Deadline 3A response [REP3A-028].   |

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| 11 | MPE02 | Natural England has concerns in relation to the evidence base to support seabed level lowering predictions of 1.5m.   | Please see further advice in Appendix J3A of Natural England's Deadline 3A response [REP3A-028].  |
| 12 | BE05  | Natural England notes that mitigation for Natural Environment and Rural Communities (NERC) Habitats is included as part of the unexploded ordnance (UXO) and/or engineering monitoring. | Natural England advises that any mitigation should commit to avoiding NERC Habitats as part of specific benthic monitoring and not as part of the UXO and/or engineering monitoring. In addition, a final mitigation plan should be agreed and signed off by the MMO in consultation with the relevant SNCB.  |
| 13 | BE06  | Marine and intertidal monitoring.   | Natural England advises that <u>all</u> marine and intertidal monitoring should be agreed and signed off by the MMO in consultation with the relevant SNCB prior to construction. And as part of the consenting process an Offshore In Principle Monitoring Plan should be submitted which includes hypothesis to be tested by the monitoring, including understanding whether residual concerns for NERC habitats are significant. |