



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES  
2010

Sea Link Energy Cable

**Appendix K4 to the Natural England Deadline 4 Submission**  
**Natural England's comments on the Examining Authority's Written Questions 1 [PD-017]**

For:

The construction and operation of Sea Link Energy Cable, located between the Suffolk and Kent Coasts in the Southern North Sea.

Planning Inspectorate Reference EN020026

**10<sup>th</sup> February 2026**

**Table 1: Natural England’s response to the Examining Authorities Questions 1 [PD-017].**

ExQ1 Ref No.	Question to:	Question	Natural England’s Response
1GEN1	All Parties (Case Team)	<p><b>Artificial Intelligence</b>            The Planning Inspectorate has guidance in relation to the use of artificial intelligence (AI). Have you used AI to create or alter any part of your documents, information or data? This does not include basic spell-check or grammar tools.            If yes;</p> <ul style="list-style-type: none"> <li>• detail what material you have submitted which has been created using AI;</li> <li>• what systems or tools you used;</li> <li>• what the source of the information the AI based its content on was; and</li> <li>• what information or material the AI has been used to create or alter.</li> </ul> <p>In addition, if you have used AI, you should do the following:</p> <ul style="list-style-type: none"> <li>• clearly label where you have used AI in the body of the content that AI has created or altered, and clearly state that AI has been used in that content in any references to it elsewhere in your documentation</li> <li>• tell us whether any images or video of people, property, objects or places have been created or altered using AI</li> <li>• tell us whether any images or video using AI has</li> </ul>	Natural England has not submitted any AI to create or alter any part of our response.

		<p>changed, augmented, or removed parts of the original image or video, and identify which parts of the image or video has been changed (such as adding or removing buildings or infrastructure within an image)</p> <ul style="list-style-type: none"> <li>• tell us the date that you used the AI</li> <li>• declare your responsibility for the factual accuracy of the content</li> <li>• declare your use of AI is responsible and lawful</li> <li>• declare that you have appropriate permissions to disclose and share any personal information and that its use complies with data protection and copyright legislation.</li> </ul> <p>If you use AI for any future submissions into this examination, ensure it is accompanied by the information as requested above.</p>	
<b>Development Consent Order (DCO) ([CR1-027] unless otherwise stated)</b>			
1GEN39	Applicant Statutory Undertakers	<p><b>Article 44</b> Explain the implications for the inclusion of paragraphs (2) to (4) and signpost to similar paragraphs within made orders. Update the explanatory memorandum and other core documents accordingly. Statutory undertakers to also provide comment</p>	Natural England has no comment to make.

1GEN60	Applicant MMO	Schedule 16 DML – condition 13 Provide an explanation of the purpose and effect of condition 13, including justification for the 10-year period. Update the explanatory memorandum accordingly. MMO to provide their view on condition 13.	It is noted that this is not a question directed at Natural England. However, we wish to state that following a call with the MMO on the 3 <sup>rd</sup> of February we can confirm that we agree to the proposed wording from MMO in response to this question.
1GEN67	Applicant Natural England MMO	<b>Surveys and monitoring conditions</b> Applicant - It is common with DMLs as part of DCOs which have an offshore element for there to be a condition requiring details of planned pre-construction surveys and monitoring to be agreed with the MMO and NE. Notwithstanding the details within the submitted oCEMP, is there a need for such a condition to be within the DML to secure this? Similarly, is there a need for a condition within the DML for post-construction monitoring, to include adaptive management where necessary, with details and methodology to be first agreed with MMO and NE?  <b>NE and MMO</b> - If considered necessary is there wording that could be suggested	Natural England has discussed this query with the MMO and can advise that as per our Relevant Representations [RR-3920] comments C10 and C11; we continue to advise that pre-construction monitoring should be secured within the DCO/DML. Furthermore, we advise that the majority of the Round 3 and Round 4 OWF NSIPs have included such monitoring. For example, the Five Estuaries DCO could provide appropriate template wording.
<b>1. Landscape and visual</b>			
1LVIA7	Natural England, Suffolk & Essex Coast & Heaths National Landscape Partnership (SECHNLP), Suffolk County Council, East Suffolk District Council	National Landscape (NL) duty Provide your comments on Document 9.47 NL Duty Section 85 Duty Technical Note [REP1-120], including the approach to the s85 duty, the natural beauty indicators in table 3.2 and the special qualities indicators in table 3.3 and the cumulative effects on the NL in section 4 and tables 4.1 and 4.2. In your response include consideration of whether the extent and nature of the preferred area of acid grassland on plate 3.2 of [REP1-120] is sufficient	Please see Appendix H4 to our Deadline 4 submission for Natural England's summary regarding our position on the LVIA issues.

		and the appropriateness of the maintenance period of 10 years.	
<b>2. Ecology and biodiversity</b>			
1ECOL5	Kent Wildlife Trust Natural England Local Authorities	<p><b>Biodiversity net gain measures – Kent landfall</b> Noting that National Grid Ventures is a separate legal entity to the applicant, can Kent Wildlife Trust (KWT) explain whether there are any measures that could be taken to reduce the residual impact of the National Grid Ventures Nemo Link works at the landfall site or to enhance this land.</p> <p>Local authorities to also provide comment</p>	Natural England advises that impacts resulting from Nemo Link cable installation on SSSI saltmarsh habitat is not an appropriate BNG option for this project as any remediation requirements due to the damage caused by Nemo Link are still under review.
1ECOL6	Applicant Kent Wildlife Trust Natural England Thanet District Council	<p><b>Former hoverport (Kent) – species surveys</b> The applicant's responses to selected RR responses [REP2-022] notes that terrestrial invertebrate surveys (such as for the fiery clearwing moth and Sussex Emerald) were not undertaken at the hoverport site due to lack of access agreement but the open tarmac and hardstanding areas through the site are sufficient for vehicles to access the intertidal area without vegetation clearance. No detailed botanical surveys or reptile surveys have been undertaken at the site, presumably also due to access arrangements. The site has been identified as hosting invasive, non-native (INNS) plant species and being potential reptile habitat. Can the applicant:</p> <ul style="list-style-type: none"> <li>• Provide an annotated aerial photograph showing an indicative vegetation-free construction traffic route.</li> <li>• Explain whether any works would be required to reinforce the access route.</li> <li>• Confirm how, in the absence of surveys for reptiles, effects on reptiles can be ruled out and</li> </ul>	We draw the ExA's attention to Natural England Deadline 3 submission Appendix J3A [REP3A-028] and Deadline 4 submission Appendix D4 where we have raised nature conservation concerns in relation to the proposed use of the former Hoverport and access across the intertidal habitats.

		<p>any special measures that might be required to avoid effects on reptiles from construction traffic.</p> <ul style="list-style-type: none"> <li>• Explain whether as a mitigation or enhancement measure, INNS could be managed at the site as part of the Sea Link proposals.</li> <li>• Explain whether NE, KWT or Thanet District Council (TDC) would be consulted on the access route.</li> </ul> <p>These organisations may wish to comment on the need for consultation on a route</p>	
1ECOL10	Natural England Kent Wildlife Trust	<p><b>Bird diverters</b> Paragraph 2.10.2 [REP1-049] notes that bird diverters would not be fitted to existing overhead lines. It is not the applicant's intention to do this for existing lines. Does NE consider that there is any need for additional diverters to be fitted to other lines in the area in light of the new mixed wirescape?</p> <p>KWT to also provide comment</p>	Natural England does not consider there to be any need for additional diverters to be fitted to other lines in the area.
1ECOL14	Applicant Natural England	<p><b>Dormouse surveys</b> Paragraph 1.5.7 of the Suffolk hazel dormouse survey report [APP-108] states that preconstruction surveys for dormouse should be undertaken in Zone D. Confirm whether the preconstruction clearance checks identified in paragraph 3.4.3 of the outline Landscape and Ecological Management Plan (oLEMP) [CR1-045] are intended to satisfy this requirement. It is noted that preconstruction surveys are currently limited to birds, bats, riparian mammals and badgers in paragraph 7.1.1 of the oLEMP.</p>	<p>Natural England agrees that preconstruction surveys should include hazel dormouse and advises that this requirement should be secured in the outline Landscape and Ecological Management Plan.</p> <p>Should the presence of protected species be confirmed then the Applicant should contact Natural England's NEWLS team for advice.</p>

		NE may wish to comment on the survey requirements	
1ECOL15	Applicant Kent County Council (KCC) Natural England	<p><b>Dormouse surveys</b> ES Part 3, Kent Chapter 2 Ecology and Biodiversity [REP1-049], paragraph 2.9.98 highlights that precautionary ways of working would be adopted on the basis that surveys identified possible dormouse nests. Paragraph 1.4.12 of the Kent hazel dormouse survey report [APP-159] states that a 'probable' rather than 'possible' nest was found in Zone C. Does this finding alter the approach, preconstruction survey requirements or assessment of effects?</p> <p>NE and KCC may wish to comment on the survey requirements</p>	Natural England does not typically comment on survey requirements for protected species where they are not a feature of a European or nationally designated site. We therefore have no comments to make on the survey requirements for Kent Hazel Dormouse.
1ECOL23	Applicant Kent Wildlife Trust Natural England	<p><b>REAC provision B45 – impacts on breeding birds from OHL and pylon installation</b> Provision B45 of the REAC [CR1-043] references works above 60dB. The ExA considers that specific noise indices should be stated to make this provision clear. The ExA also notes that the provision retains the option for works to occur during two months of the breeding season. KWT and NE are requested to comment on the appropriateness of this provision and whether any</p>	Natural England advises that all works which may result in disturbance to notified breeding birds associated with the Sandwich Bay to Hacklinge Marshes SSSI to avoid the breeding bird season (March to September inclusive).

		particular two months during this period would be preferable	
1ECOL25	Applicant Kent Wildlife Trust Natural England	<b>REAC provision B50 – disturbance to breeding birds</b> Provision B50 of the REAC [CR1-043] references March to June as the breeding season. Confirm whether this should read March to September. The ExA notes that provision B65 also references March to June.	Natural England has noted an error in our Deadline 3 response regarding our comments on provision B50 within the REAC. We would expect these disturbing works to take place outside of the breeding bird season, which is March to September inclusive.
1ECOL26	Applicant Kent Wildlife Trust Natural England RSPB	<b>REAC provision B59 – impacts of potential frac out</b> Provision B59 of the REAC [CR1-043] allows for the sharing of an HDD landfall method statement and drilling fluid management plan for information with NE only. Confirm whether other parties such as RSPB and KWT should also be party to this provision. Also comment on whether, in light of the potential for impacts on sites for which NE, KWT and RSPB have responsibility, they should also approve or be consulted on these plans. The provision should be updated to explain when these plans should be made available.	Natural England would like the opportunity to comment on these documents rather than them be shared ‘for information only.’ Please see our Deadline 3A submission Appendix J3A [REP3A-028] and our Deadline 4 submission Appendix J4
1ECOL28	Applicant Natural England RSPB	<b>REAC provision B60 – impacts of potential frac-out</b> Provision B60 of the REAC [CR1-043] allows for notification of NE and RSPB in the event of a frac-out. In light of the sensitivity of the designated sites, is there a need for a more active role in this provision than currently worded for NE and RSPB?	Natural England refers the ExA to Appendix B to Natural England’s Relevant Representations, Appendix J3A [REP3A-028] to our Deadline 3A submission and specially Appendix J4 to our Deadline 4 Submission – where we have raised concerns about access to the saltmarsh in the event of a frac-out, and advised that an Outline

		For example, to control routing of spotters and agreement of vehicle use on existing accesses.	Intertidal Management Plan is prepared containing these requirements, which should be submitted to the regulators and agreed in consultation with the relevant SNCB prior to construction.
1ECOL29	Applicant Natural England RSPB	REAC provision B62 - impacts of HDD on Site of Special Scientific Interest (SSSI) Provision B62 of the REAC [CR1-043] allows for preconstruction botanical surveys to support monitoring of any impact of HDD. Should this provision be to support 'monitoring and mitigation' of any impact of HDD, since the location of plants might dictate routes of access and priorities for mitigation amongst other things?	Natural England welcomes the 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.
1ECOL30	Natural England	<b>REAC provision B63 – impacts on shingle habitats</b> Provision B63 of the REAC [CR1-043] requires the applicant to inform NE about proposals to undertake additional groundwater investigation on, or adjacent to, shingle habitats. Is NE content with this provision and should an Ecological Clerk of Works (ECoW) be referenced? The ExA notes that there is a typo 'urveys'	We note measure B63 to inform Natural England of any proposals to undertake groundwater investigation surveys on or adjacent to shingle habitats.  To clarify our advice in A7 of our Risks and Issues log, the GI surveys we were referring to were ground investigation surveys, such as were conducted to inform HDD feasibility. If the results of any future such surveys meant that a change in the depth of HDD drilling was needed, then potential dewatering impacts on sensitive shingle habitats would need to be assessed. To clarify Point A7, dewatering impacts should be assessed if additional ground investigation boreholes are needed or if the additional ground investigation surveys determine that a change in the depth of drilling is needed.  Natural England also highlights that ground investigation works can have significant impacts/Adverse Effect on Integrity (AEoI) in their

			own right and this would be subject to a separate planning permission and/or Marine Licence application.
1ECOL31	Applicant Kent Wildlife Trust Natural England	<b>REAC provision B66 – impact on former hoverport ecology</b> Provision B66 of the REAC [CR1-043] allows for botanical survey to inform the construction access route within the hoverport and references foodplants of ‘rarest vertebrates’. The ExA assumes that this should read ‘invertebrates.’ The ExA requests comment on whether this provision should also include reptile survey and whether the provision could be expanded to more proactively remove INNS as an improvement measure.	We advise that surveys to inform the construction access route should include reptiles.  Should the presence of protected species be confirmed then the applicant should contact Natural England’s NEWLS team for advice.  We direct the applicant to our standing advice for reptiles for further guidance on this.  For more general comments on REAC B66 please see Appendix J4 to our Deadline 4 submission
1ECOL32	Applicant Kent Wildlife Trust Natural England	<b>REAC provision B67 – impact on saltmarshes</b> Provision B67 of the REAC [CR1-043] requires confirmation of an access route across the intertidal area to be defined post consent and informed by surveys. No reference is made to consent or approvals from KWT or NE, should it? The ExA notes that B67 seems to overlap with provision B70, can the two provisions be merged?	We refer the ExA to Appendix J4 of our deadline 4 submission and Appendix J3A [REP3A-028] to our Deadline 3A submission where we highlight that we do not believe that mitigation measures are sufficient to avoid impacts to vegetation.  Furthermore, as stated above, Natural England would like the opportunity to comment upon the access route once a final design plan is known.
1ECOL33	Applicant Kent Wildlife Trust Natural England	<b>REAC provision B68 – Impact on Pegwell Bay</b> Provision B68 of the REAC [CR1-043] provides for a Pegwell Bay landfall construction method statement covering the marine cable pull in and cable burial. Should this provision include cable	We refer the ExA to Appendix J4 of our deadline 4 submission and Appendix J3A [REP3A-028] to our Deadline 3A submission where we have advised that further commitments are required to mitigate impacts and that the final Landfall Construction

		excavation and laying in the intertidal area too and is there a requirement for the provision to include consultation and/or approval with KWT and NE?	Method Statement should be agreed in consultation with NE prior to construction.
1ECOL34	Applicant Kent Wildlife Trust Natural England	<b>REAC provision B69 – impact on saltmarshes</b> Provision B69 of the REAC [CR1-043] requires that trenchless exit pits would be at least 105m seaward from the edge of the saltmarsh, however temporary working areas are stated to be a minimum of 50m from the saltmarsh edge. In light of the potential for disturbance of bird species using the saltmarsh is this a sufficient offset distance?	Natural England advises in Appendix J3A [REP3A-028] to our Deadline 3A submission that no evidence has been presented that 50m is sufficient to ensure that significant impacts to saltmarsh features can be avoided.
1ECOL59	Natural England	<b>HRA – screening out of LSE for dune slack qualifying features of Sandwich Bay SAC</b> The applicant provided further justification for its decision to screen out LSE to dune slack qualifying features of the Sandwich Bay SAC from hydrological impacts in its updated HRA Report [REP2-009], based on information in a technical note at Appendix F. Confirm if this addresses your concerns about this impact pathway (as set out in B1, B9, B21, B30 to B33 [RR-3920] [REP1-154A]). If not, advise what further information you consider is required from the applicant to support its position. Provide any evidence you hold that suggests that there is connectivity with the Sandwich Bay SAC.	Natural England can confirm that the additional information provided by the Applicant at Deadline 1, which we commented on in Appendix J3A [REP3A-028] to our Deadline 3 submission, is sufficient to address our concerns on this impact pathway.
1ECOL60	Natural England	<b>HRA – effects on Stodmarsh SAC</b> NE ([RR-3920], appendix B and appendix G) did not dispute the applicant's conclusions of no LSE to Stodmarsh SAC. Can NE confirm if it agrees the conclusion. If not, set out your concerns.	Natural England can confirm that we agree with the Applicant's conclusion of no likely significant effect for Stodmarsh SAC.

1ECOL61	Natural England	<p><b>HRA – LSE conclusions for OTE SPA</b>  Further to the applicant’s update to the HRA Report [REP2-009] in paragraphs 4.3.41 to 4.3.42, does NE agree with the applicant’s conclusion that a LSE on all qualifying features of the OTE SPA can be excluded as result of impacts on their supporting habitats?</p>	<p>Natural England agrees with the Applicant that the impacts on the supporting habitat (i.e. the seabed substrate and water column) are likely to be sufficiently temporary to not engage the SPA conservation objectives and cause an AEol for any of the cited qualifying features, particularly if the majority of the planned work in the water column and on the seabed within the SPA is also seasonally restricted to avoid the period most red-throated diver (RTD) are present in winter (as stated in Doc. 7.8, the Red-throated Diver protocol).</p> <p>Natural England are primarily concerned about potential Adverse Effect on Integrity (AEol) on the OTE SPA caused by unmitigated and protracted disturbance from vessel activity associated with the project and its consequent displacement of wintering RTD.</p>
1ECOL62	Natural England	<p><b>HRA – emergency operation and maintenance activities in the OTE SPA</b>  The applicant ([REP2-014], table 2.38, G10) has confirmed it could provide NE with a report on emergency operation and maintenance activities undertaken in the OTE between November and March. Does NE require such a commitment to be made within the RTD protocol?</p>	<p>Natural England would seek a report on any operation and maintenance activities within the OTE SPA and its 2km buffer during the seasonally restricted period. For clarification, this commitment should be made within the Red-throated Diver Protocol (Doc. 7.8). We also highlight that the current protocol should be updated to do so as the current iteration states the proposed reporting of essential emergency operations and maintenance work would not cover the full sensitive period but only the period between 1<sup>st</sup> January - 31<sup>st</sup> March (see Doc. 7.8, section 1.5.8, pg. 7).</p> <p>A record of this activity, its scale and extent, detailing the nature of the event, and the specific location, duration and extent of any works undertaken,</p>

			including associated vessel transits, should be provided to help quantify potential impacts and for assessment of future cumulative/in-combination effects from similar projects.
1ECOL63	Natural England	<p><b>HRA – operational air quality emissions</b>  Can NE confirm to which European site(s) its concerns regarding operational air quality emissions ([RR-3920] B24 and B37) relate? The applicant has revised the HRA Report [REP2-009] to confirm that during the operational and maintenance phase, there would be up to 4 daily car/LGV trips associated with staff members for the proposed Minster converter station, and occasional maintenance and inspection. Does NE agree that in-combination LSEs can therefore be excluded and if not, why not?</p>	<p>Natural England advises that the European sites are Thanet Coast and Sandwich Bay Special Protection Area and Ramsar site, and Sandwich Bay Special Area of Conservation.</p> <p>Natural England advises that the air quality related aspects arising from this DCO can be addressed using our new standard advice.</p> <p>We therefore direct you to our standing advice for air quality provided in Appendix B3, Annex 1 [REP3-117] of our Deadline 3 submission for further guidance on this</p>
1ECOL64	Natural England	<p><b>HRA – operational in-combination air quality emissions</b>  Can NE confirm to which European site(s) its concerns regarding in-combination air quality emissions ([RR3920, B18 and B26) relate? The applicant has responded that the predicted project alone effects are too small to show in the model, so it considered there would be no in combination</p>	<p>Natural England advises that the European sites are Thanet Coast and Sandwich Bay Special Protection Area and Ramsar site, and Sandwich Bay Special Area of Conservation.</p>

		<p>effect ([REP2-014], table 2.33, B26).</p> <p>Does NE agree that in-combination LSEs can therefore be excluded?</p>	<p>Natural England advises that the air quality related aspects arising from this DCO can be addressed using our new standard advice.</p> <p>We therefore direct you to our standing advice for air quality provided in Appendix B3, Annex 1 [REP3-117] of our Deadline 3 submission for further guidance on this</p>
1ECOL65	Natural England	<p><b>HRA – acid grassland</b></p> <p>NE has advised it is essential to understand soil fertility and pH for successful restoration of acid grassland at Sandlings SPA [REP1-154]. Noting that the proposed acid grassland enhancement has been removed from the proposed development, is this information still relevant to the proposed acid grassland creation and would such information be required at pre-consent stage, or can amendments be made to the oLEMP [CR1-045]?</p>	<p>Natural England advises that our advice regarding soil fertility and pH applies to either acid grassland enhancement or creation. We advise it is important to provide the information at pre-consent stage in order to provide enough certainty that the required mitigation/compensation is feasible within the timeframe.</p> <p>We refer you to Appendix A3 [REP3-116] to our Deadline 3 Submission and Appendix A4 to our Deadline 4 submission.</p>
1ECOL66	Natural England	<p><b>BNG metric spreadsheet and feasibility report</b></p> <p>The ExA requests that NE provide comment on the biodiversity metric spreadsheets [REP1A-040] to [REP1A042] and on the revised BNG feasibility report [REP1A-025].</p>	<p>Natural England will review the application of the biodiversity metric for Deadline 5. However, we highlight that the feasibility report is to be considered by the LPA and delivery partners.</p>
<p><b>7. Air Quality</b></p>			

1AQ2	Natural England East Suffolk Council	<p><b>Air quality modelling for construction compound at Sandlings</b> Suffolk Energy Action Solutions Ltd (SEAS) [RR-5210] suggests that the air quality model is inaccurate and that quantification of emissions from the HDD compound adjacent to Sandlings SPA and from back-up generators is required. Provide comment on the model and explain whether you consider that further quantification is necessary and if not, why not?</p>	<p>Natural England advises that the air quality related aspects arising from this DCO can be addressed using our new standard advice.</p> <p>We therefore direct you to our standing advice for air quality provided in Appendix B3, Annex 1 [REP3-117] of our Deadline 3 submission for further guidance on this</p>
1AQ8	East Suffolk Council Natural England Thanet District Council Dover District Council	<p><b>Outline air quality management plan (oAQMP)</b> Do the councils or NE have any comment on the proposed air quality monitoring equipment or the proposed air quality monitoring locations set out in the oAQMP [AS-129] and [APP-347]. It is noted that the applicant 'recommends' rather than 'proposes' use of zephyr monitors for dust monitoring. In Suffolk, the monitoring location is noted to be south of the HDD compound which is likely to pick up effects on human receptors but not on the ecological designated sites to the northeast (the prevailing wind direction)</p>	<p>Natural England advises that the air quality related aspects arising from this DCO can be addressed using our new standard advice.</p> <p>We therefore direct you to our standing advice for air quality provided in Appendix B3, Annex 1 [REP3-117] of our Deadline 3 submission for further guidance on this</p>
<b>15. Physical Environment</b>			
1PE2	Kent Wildlife Trust Natural England Local authorities	<p><b>Pegwell Bay – previous cable installation works</b> Confirm whether any residual adverse effects from previous cable installation works within the intertidal area have been identified at Pegwell Bay (exclude reference to the saltmarsh and lagoon, which RRs have previously highlighted).</p>	<p>Other than what has already been highlighted, Natural England is not aware of any other residual adverse effects within the intertidal area. However, we note that monitoring of other habitats within Pegwell Bay were limited.</p>

1PE9	Natural England MMO	<b>Microplastics arising from rock armour</b> In other NSIP examinations (for example for Morecambe Offshore Windfarm) the MMO and NE highlighted concerns regarding microplastics. Are MMO or NE aware of any constraints relating to the generation of microplastics from rock armour solutions for this project (for example from rock bags) and if so, are any specific control measures for microplastics required?	Natural England advises that the introduction of microplastics into the water column should be avoided where possible. For example, the preference is to use concrete mattresses over fronded mattresses. And for brushwood fronds over plastic ones where fronds are required. Full consideration and assessment of all environmental impacts of different types of cable protection methods and alternative materials is required.
<b>17. Marine Mammals</b>			
1MM2	Natural England	<b>Noise effects on seals</b> Provide a response to the Seals and Airborne Sound Disturbance Technical Note [REP1-122].	Natural England welcomes the provision of this technical note which addresses our RR issue F17 [RR-3290 F]. This document has the correct M-weighted sound modelling. Natural England will review the updated HRA as required and update at deadline 5.
1MM5	Applicant Natural England	<b>Marine mammal observer (MMob)</b> Provide a response to KCC's LIR [REP1-129] in relation to the need for a MMob during cable trenching/laying as well as during geophysical surveys.	With the information provided as of deadline 2 Natural England is unable to assess the need for MMob during cable trenching/laying. This will be revisited at deadline 5, once the updated marine mammal EIA chapter and HRA have been reviewed.
1MM9	Natural England	<b>HRA - screening</b> No additional onshore European sites, or European sites designated for marine mammals were identified in ([RR3920], Appendices A, B and F) on the applicant's HRA screening in [REP2-009]. Confirm if you agree that all relevant sites have been screened in for these receptors. If not, confirm which additional sites should be considered.	Natural England agrees that all relevant European sites for marine mammals have been screened in.
1MM15	Natural England	<b>Comments requested on [REP2-014]</b> Provide a response to the applicant's response [REP2-014] to NE's RR in relation to marine mammals	The Applicant's response refers to updates to Application Document 6.2.4.4 (E) Part 4 Marine Chapter 4 Marine Mammals and/or Application Document 6.6 (B) Habitats Regulations Assessment

			<p>received at deadline 3. Natural England is currently reviewing these documents and will provide a response at deadline 5.</p> <p>Natural England advises this ExQ is relevant to the following Natural England RR references: F 1, 2, 3, 4, 5, 6, 8, 9, 10, 11, 12, 13, 14, 19, 21, 27, 31, 32</p> <p>Responses on further Risks and Issues raised in our Relevant Rep [RR-3920]: F15 - Natural England expects the project to have undertaken underwater noise modelling to accurately predict the impacts of underwater noise. The outputs of this modelling will inform the impact ranges for the noisy activities planned for this project and therefore are essential for assessing the impacts from the project on marine mammals. No information has been provided to show evidence of this modelling. Natural England expects to see an underwater noise modelling report with details of the methodology and outputs from the modelling to be incorporated into the impact assessments.</p> <p>F16, F28 &amp; F30 – Natural England agrees with the applicant's response this can be marked as resolved.</p> <p>F17 – Response given above (1MM2).</p> <p>F18 &amp; F29 – Natural England agrees with the applicant's response, and this can be marked as resolved.</p>
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			F20 – Natural England responded to the updated Application Document 7.5.11 (B) Outline Marine Mammal Mitigation Plan at deadline 3 [REP3-119].
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