



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Sea Link Energy Cable

Appendix D5 to the Natural England Deadline 5 Submission

Natural England's Additional Comments on Marine Physical Environment

For:

The construction and operation of the Sea Link Energy Cable.

Planning Inspectorate Reference EN020026

11th March 2026

Appendix D5 Sea Link Deadline 5 Marine Physical Environment

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

Sea Link Deadline 4 Submission Documents:

- [REP4-028] 6.2.4.1 (E) Environmental Statement Part 4 Marine Chapter 1 Physical Environment (Tracked)
- [REP4-050] 6.4.4.1 (D) Environmental Statement Figures Marine Physical Environment (Tracked)
- [REP4-058] 6.6 (F) Habitats Regulations Assessment Report (Tracked)
- [REP4-060] 6.11 (C) Marine Conservation Zone Assessment (Tracked)
- [REP4-082] 9.86 (A) Applicant's Comments on Other Submissions Received at Deadlines 3 and 3A
- [REP4-090] 9.92 (A) Outline Cable Specification and Installation Plan
- [REP4-091] 9.93 (A) Offshore Decommissioning Technical Note
- [REP4-102] 9.113 (A) The Coralline Crag Technical Note
- [REP4-224] Late Deadline 4 Submission - Accepted at the discretion of the Examining Authority - 7.5.2 (B) Outline Offshore Construction Environmental Management Plan (Tracked)
- [REP4-230] Late Deadline 4 Submission - Accepted at the discretion of the Examining Authority - 9.13 (C) Pegwell Bay Construction Method Technical Note (Tracked)
- [REP4-234] Late Deadline 4 Submission – 9.84 (B) Register of Environmental Commitments (REAC) (Tracked)
- [REP4-242] 9.86 (B) Applicant's Comments on Other Submissions Received at Deadlines 3 and 3A (Tracked Changes) - Late Deadline 4 Submission Accepted at the discretion of the Examining Authority

Detailed comments

Table 1: Natural England’s Advice On: Marine Physical Environment

Document reviewed: [REP4-028] 6.2.4.1 (E) Environmental Statement Part 4 Marine Chapter 1 Physical Environment (Tracked), [REP4-050] 6.4.4.1 (D) Environmental Statement Figures Marine Physical Environment (Tracked)			
NE Ref	Section	Key Concern and/or Update	Natural England’s Advice to Resolve Issue
1	1.7.65 & Figure 9.13.1, Appendix C [REP4-230]	<p>Natural England notes that [REP4-028] does not include any further consideration of potential impacts on the intertidal and designated site features due to migration of the River Stour channel towards the buried cable during the life of the Project. However, uncertainty exists regarding the future position of this channel and whether natural processes could expose the cable. This could lead to a requirement for remedial cable reburial/protection works. Therefore, we advise that ensuring an adequate cable burial depth is key.</p> <p>Appropriate consideration also needs to be given to potential climate change effects, not just mean sea level rise, but increased storminess and increased rates of erosion.</p> <p>It is also important to undertake monitoring of the intertidal area through the Project lifetime. We note the Applicant’s commitment to undertake depth of burial monitoring surveys post installation (MPE05) in [REP4-234].</p>	<p>Natural England advises that further consideration needs to be given to ensuring an adequate depth of cable burial across the intertidal zone of Pegwell Bay, including addressing uncertainties regarding migration of the River Stour channel towards the buried cable, sea level rise, seabed erosion and impacts from increased storminess associated with climate change. The Cable Burial Risk Assessment (CBRA) has not been revised since 2024. We advise that this should be updated with the most recent information and aligned with other relevant documents.</p> <p>Furthermore, we advise that monitoring of the cable route through Pegwell Bay over the lifetime of the project should be carried out to ensure there are no unexpected changes to intertidal morphology, important designated features and supporting habitat.</p>

2	1.8.4, Page 78	Natural England notes the addition of MPE04 control/management measure. This is a commitment to keep rock berm height and width to a practical and safe minimum. However, these rock berm parameters have not been quantified or assessed in relation to potential disruption to marine processes.	Natural England advises that a practical and safe minimum rock berm height and width should be defined and environmental impacts assessed to demonstrate that significant disruption of marine processes is unlikely to occur.
3	1.8.4	Natural England notes and welcomes control/management measure MPE06 to undertake monitoring of the beach profile and erosion rates at the Suffolk landfall (where rock bags are planned to be placed at the Horizontal Directional Drilling (HDD) exit pits) over the Proposed Project lifetime. Whilst this is welcomed, we note that there is no corresponding measure for monitoring coastal change at the Kent landfall.	Natural England advises that the same control/management measure should be applied to the Kent landfall and both commitments to monitoring should be included in an In Principle Monitoring Plan (IPMP).
4	1.8.4	Natural England notes and welcomes the addition of management measure MPE07 to avoid creating pre-cut trenches at the Coralline Crag and instead using rock bags or mattresses to protect cables to avoid impacts to geological features and aid the recovery post decommissioning.	This is welcomed. However, we wish to see commitment MPE07 go further to ensure that cable protection and any cables which are likely to become exposed, are removed at decommissioning and committed to.
5	1.9.9-1.9.12 & Table 1.18, Page 79-81	Natural England notes that whilst the impact assessment considers the temporary use of rock bags/concrete mattresses to protect the HDD exit pits/ducts during construction, the Maximum Design Scenario (MDS) has not been captured in	Natural England advises that the MDS for of temporary rock bags/concrete mattresses at the HDD exit pits/ducts should be quantified and impacts fully considered and assessed.

		Table 1.18. The proposed temporary protection will likely interact with, and modify, the local nearshore wave regimes and associated sediment transport patterns. This may result in localised scour and increased erosional potential in important and sensitive inter-tidal/subtidal areas. Therefore, we consider it important to adequately assess the magnitude and scale of these impacts.	
6	Table 1.18, Page 79	Natural England notes that temporary bog mats will be used where the access corridor from the former hoverport crosses the Nemo and Thanet cables. The aim being to protect the cables and minimise potential for disturbance to the ground around the cables. While we encourage efforts to reduce environmental impacts, we are concerned that the movement of heavy construction plant and vehicles (e.g. 40t excavators) across the intertidal, could lead to impacts on important intertidal mud/sand flats (including disturbance and spreading of sediment around the bog mats and release of contaminants from the hoverport). These potential impacts have not been adequately considered or assessed.	Natura England advises that further investigation is needed to assess the potential for disturbance of intertidal mud/sand flats due to the movement of heavy construction vehicles/plant across the access route from the former hoverport to the HDD working area. Furthermore, our concerns remain regarding the potential release of contaminants into coastal waters and sediments from the hoverport site due to the movement of heavy construction vehicles/plant. This also requires further investigation.
6	1.9.27-1.9.29	Natural England notes the further consideration given to potential impacts on coastal processes and intertidal morphology in Pegwell Bay due to the presence of cofferdams during construction, which is welcomed. Whilst we welcome the Applicant's predictions of temporary	Natural England considers it important for the Applicant to fully consider mitigation measures and where impacts can't be avoided provide supporting evidence to demonstrate the recoverability of the intertidal mud/sand flats and saltmarsh habitats to pre-construction conditions. Moreover, we advise that

		<p>morphological impacts, we note that there is a lack of empirical evidence (for example, from Thanet OWF or Nemo Link) to support these conclusions.</p> <p>We are also concerned that the Applicant has not assessed the sensitivity of the saltmarsh to potential blockage effects/impacts to drainage due to the close proximity of the cofferdams to the saltmarsh edge (i.e. 105-140m). In our advice at Deadline 3A [REP3A-028], we commented on the Applicant's assurances that a distance of 105-140m between the exit pits and the saltmarsh would be sufficient to avoid damage. However, the potential for blockage related impacts on the saltmarsh due to the presence of cofferdams has not been considered in the Marine Physical Environment chapter [REP4-028].</p>	<p>the Applicant should commit to post-installation surveys to demonstrate recovery of the intertidal mud/sand flats.</p> <p>Natural England also advises that the Applicant should consider the sensitivity of the saltmarsh to potential blockage effects due to the close proximity of the cofferdams.</p>
7	1.9.44 & Figure 6.4.4.1.11	<p>Natural England welcomes Figure 6.4.4.1.11 which identifies the location of cable crossings along the offshore scheme route. Although we note it does not identify other sections of the cable route where cable protection may be required.</p> <p>We also note the location of the Farland North crossing directly adjacent to an Annex I sandbank – this appears to be Aldeburgh Napes.</p>	<p>Natural England advises that this impact pathway should be further considered and assessed.</p> <p>We also advise that other potential cable protection locations along the offshore cable route should be identified.</p>

		<p>We highlight that the Aldeburgh Napes sandbanks are considered to offer protection to the Aldeburgh and Thorpeness coastlines from wave impact. Therefore, we are concerned, that the presence of a cable crossing adjacent to Aldeburgh Napes could interrupt bedload transport, alter sandbank morphology, and influence shoreline change. Burningham and French (2008) also identified a long-term trend of gradual denudation of the Aldeburgh Napes sandbanks which could also be affected by the adjacent cable crossing.</p>	
8	1.9.56-1.9.60	<p>Natural England notes that whilst sediment plume dispersion modelling has not been carried out for cable installation at the Kent landfall; the Applicant has given further consideration to increased suspended sediment concentrations (SSCs) and sediment deposition due to cable burial installation. However, the Applicant considers that any increase in SSC will appear as a short duration 'spike' while sediment deposition on the intertidal surface will be limited. This is welcomed, but advise that further details are needed, such as anticipated maximum spatial extent of increased SSCs and subsequent sediment deposition thickness due to cable installation, before we can be confident in the Applicant's conclusions.</p>	<p>Natural England advises that the maximum suspended sediment dispersion extent and concentration, and associated sediment deposition due to cable installation at Pegwell Bay, should be provided. Alternatively, if available, supporting evidence from projects such as Nemo Link or Thanet OWF should be presented to demonstrate the scale and extent of increased SSCs and sediment deposition. This will increase understanding of potential construction impacts on saltmarsh and intertidal mud/sand flats.</p>

9	1.9.80-1.9.82	Natural England notes that the assessment of operational cable protection impacts on Goodwin Sands MCZ and Cross Ledge sandbanks only considers the presence of the Nemo Link crossing which is approx. 3km away. The potential impact of cable protection placed adjacent to the MCZ or on/adjacent to the Cross Ledge sandbanks has not been considered in the assessment.	Natural England advises that potential impacts on the Goodwin Sands MCZ and Cross Ledge sandbanks due to the placement of cable protection measures on/adjacent to these sandbank systems need to be considered and assessed.
10	Figure 6.4.4.1.4 & 1.7.138-1.7.145	Natural England notes the updated data in Table 1.17 on the estimated average erosion width from the National Coastal Erosion Risk Mapping (NCERM) dataset for 2055 and 2105, and the addition of Figure 6.4.4.1.4 which presents the estimated future erosion extent at the Kent landfall. These additions are welcomed, although, we note that the erosion risk data have not been considered within the context of the relevant Shoreline Management Plan (SMP).	Natural England advises that the coastal erosion risk data should be considered in the context of the relevant SMP.
11	1.7.138	Natural England welcomes confirmation in [REP4-242] that the 2024/5 NCERM2 dataset has been used to assess future baseline conditions associated with potential shoreline change.	This resolves this issue.

Table 2: Natural England's Advice On: Marine Physical Environment

Document reviewed: [REP4-060] 6.11 (C) Marine Conservation Zone Assessment (Tracked)			
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	1.5.2 & 1.7.22	Natural England notes that the assessment of impacts on Goodwin Sands MCZ due to cable protection measures only considers the Nemo Link crossing point which is approximately 3.3km from the MCZ. It does not consider indirect impacts on the MCZ due to the placement of cable protection measures adjacent to the MCZ. However, as stated in 1.7.22, cable installation and repair may require protection measures at some locations where the minimum target cable burial depth of 0.5m cannot be achieved. Given that the Offshore Scheme Boundary runs adjacent to the MCZ there is a potential for impacts on the MCZ due to placement of cable protection adjacent to the MCZ, which could interrupt bedload sediment transport processes and, in turn, affect seabed morphology in the MCZ.	Natural England continues to remain concerned that the placement of cable protection measures adjacent to Goodwin Sands MCZ during the operational phase have the potential to affect hydrodynamic and sediment transport regimes and, in turn, lead to morphological change within the MCZ. Further justification and consideration of these impacts to the MCZ are still required to support conclusions made by the Applicant.
	1.5.24	Whilst Natural England welcomes the height of any protection to <1m there is no evidence presented to support conclusions drawn by the Applicant that this is sufficiently low as to not disrupt coastal and marine processes	Natural England advises that further evidence is required to demonstrate that marine and coastal processes will not be significantly disrupted by the placement of cable protection and impact on benthic features of the MCZs

Table 3: Natural England's Advice On: Marine Physical Environment

Document reviewed: [REP4-090] 9.92 (A) Outline Cable Specification and Installation Plan			
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	Table 3.1	Natural England notes that it is stated that the maximum length of pre-sweeping is 17.563m. However, we would advise that this is a typo and should be 17.563km which would align with the anticipated pre-sweeping between KP 96.32 and KP 113.883.	Natural England advises that the max. length of pre-sweeping in the Cable Specification and Installation Plan (CSIP) should be amended.
2	1.12-1.14	Natural England notes that currently the CSIP is high-level. While it is stated that the current CSIP is outline, more specific details will need to be provided.	Natural England refers the Applicant to the subsea cable best practice guidance which recommends the information that should be clearly laid out in the CSIP, for example: any relevant mitigations proposed in the Environment Statement (ES), footprint of impact of chosen methodologies and how they comply with the ES, and detailed cable installation programme. The CSIP should also be compared with the information provided in the CBRA.
3	4.3.9	Natural England notes that the minimum depth of lowering (DOL) in areas of bedrock is 0.5m, with a target DOL of approximately 1-2.5m to be achieved where possible dependent on the seabed geology. However, we note that the target DOL for the Kent landfall is 1.5m [REP4-224], has not been included here.	Natural England advises that, for consistency, the CSIP target DOL parameters should reflect the same information presented in relevant related documents.

Table 4: Natural England’s Advice On: Marine Physical Environment

Document reviewed: [REP4-091] 9.93(A) Offshore Decommissioning Technical Note			
NE Ref	Section	Key Concern and/or Update	Natural England’s Advice to Resolve Issue
1	2,1,2	Natural England notes that sediment transport studies have been commissioned and undertaken which outline the short- to medium-term nearshore beach variance and stability at both landfalls. We also note that surveys will be used to provide an indication of the condition of the infrastructure and state of the environment, which is also welcomed as the baseline conditions and value of receptors are likely to change through the life of the Project.	Natural England welcomes the Offshore Decommissioning Technical Note. We would welcome the opportunity to review the decommissioning sediment transport studies to inform understanding of future beach and landfall changes and stability in due course.

Table 5: Natural England’s Advice On: Marine Physical Environment

Document reviewed: [REP4-102] 9.113 (A) The Coralline Crag Technical Note			
NE Ref	Section	Key Concern and/or Update	Natural England’s Advice to Resolve Issue
1	2.1.5	Natural England notes the amendment that has been made to commitment GH14 in the REAC to ensure that the lengthened HDDs will exit a minimum of 45m east of the continual Coralline Crag outcrop.	This is welcomed.

2	1.1.3 (& GH14 in REAC)	Natural England notes that the Proposed Project has committed to the HDDs exiting in areas that do not have Coralline Crag outcrop at the surface, as well as exiting east of the continuous coralline crag outcrops defined by Centre for Environment, Fisheries and Aquaculture Science (Cefas) mapping. This is based on Cefas mapping of the Crag. However, the age of the Cefas mapping is not stated. Therefore, we advise that up-to-date mapping may be required to ensure that the extent and location of the Coralline Crag outcrops are identified prior to HDD installation.	We advise that the Applicant should consider whether mapping of the Coralline Crag is needed prior to HDD installation. This will inform understanding of the extent and location of the Crag prior to undertaking HDD installation works.
3	3.1.4	Natural England notes that the Applicant considers that due to the Coralline Crag being 'a weak rock, as exemplified by it forming a resistant outcrop on the sea floor, the HDD bore is expected to be self-supporting in the Coralline Crag and there is not expected to be any localised collapse that could migrate upward to the surface outcrops.' Furthermore, we note in [REP4-082] that the HDD will be designed to ensure that it is within the competent ground beneath the Crag outcrops to ensure that surface outcrops are unaffected by the HDDs. This is also welcomed.	Natural England welcomes the Applicant's efforts to design the HDD at sufficient depth to ensure it is within competent ground beneath the crag outcrops thus avoiding any impacts to the surface outcrops. Whilst the HDD will pass through the Coralline Crag at depth, it is anticipated that this will not lead to collapse of surface outcrops. This resolves our concerns regarding construction impacts on the Coralline Crag.
4	General comment	Natural England notes that [REP4-102] considers only interaction between the HDD exit and the Coralline Crag marine outcrops (i.e. construction phase). We consider that there remains the potential for operational impacts on the Coralline Crag due to cable repair/replacement through the lifetime of the Proposed Project.	Natural England advises that potential operational impacts on the Coralline Crag should be considered.

Table 6: Natural England's Advice On: Marine Physical Environment

Document reviewed: [REP4-234] Late Deadline 4 Submission – 9.84 (B) Register of Environmental Commitments (REAC) (Tracked)			
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	Table 3.4/MPE07	Natural England notes that the commitment to avoid installation of cables at the Coralline Crag without pre-cut trenches (MPE07) is not reflected in the Cable Burial Risk Assessment (CBRA) [PDA-039]. In the CBRA it is stated that competent bedrock (Coralline Crag, Chalk, and flint beds) subcrops or outcrops, the preferred method of protection is by mechanical trenching. The recommended DOLs in the CBRA are not aligned with more recent documents such as the REAC, Code of Construction Practice (CoCP), Outline Offshore Construction Environmental Management Plan [REP4-224].	Natural England advises that the DOLs (and other information) presented in the CBRA should be updated to align with the latest information provided in more recent documents/submissions.
2	Table 2.3/B68	Natural England notes commitment B68 states that a Pegwell Bay Landfall Construction Method Statement will be prepared covering marine cable pull-in and cable burial between Mean Low Water Springs (MLWS) and the trenchless crossing exit pit. However, we query whether this will cover all activities associated with construction at landfall?	Natural England request clarity on the scope and purpose of this document. We would welcome it being a named live plan to be refined to inform construction, with the finalised plan signed off and agreed by MMO in consultation with relevant SNCB prior to construction.

3. References

Burningham, H. and French, J. 2008. Historical changes in the seabed of the greater Thames estuary. The Crown Estate, 54pp.