



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Sea Link Energy Cable

**Appendix E5 to the Natural England Deadline 5 Submission
Natural England's Intertidal and Benthic Ecology Advice**

For:

The construction and operation of Sea Link Energy Cable

Planning Inspectorate Reference EN020026

11th March 2026

Appendix E5 Sea Link Deadline 5 Benthic Ecology

In formulating these comments, the following documents have been considered

Sea Link Deadline 3 Submission Documents

- [REP3-025] 6.4.4.1 (C) ES Figures Marine Physical Environment (Tracked).

Sea Link Deadline 4 Submission Documents

- [REP4-030] 6.2.4.2 (D) Part 4 Marine Chapter 2 Benthic Ecology (Tracked Changes).
- [REP4-058] 6.6 (F) Habitats Regulations Assessment Report (Tracked Changes).
- [REP4-060] 6.11 (C) Marine Conservation Zone Assessment (Tracked Changes).
- [REP4-072] 7.7 (C) Marine Biosecurity Plan (Tracked Changes).
- [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).

Detailed comments:

Table 1: Natural England’s Advice On: Benthic

| Document reviewed: [REP4-030] 6.2.4.2 (D) Part 4 Marine Chapter 2 Benthic Ecology (Tracked) | | | |
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| NE Ref | Section | Key Concern and/or Update | Natural England’s Advice to Resolve Issue |
| E5.1 | Section 2.9.9 | <p>Natural England disagrees with the tracked changes which set out justification for why peat and clay exposures and subtidal chalk have a sensitivity rating of ‘medium’ to temporary disturbance.</p> <p>Natural England highlights that these habitats are NERC Section 41 Habitats of Principal Importance, Features of Conservation Importance (FOCI) and Marine Irreplaceable Habitats (Tillin et al. 2022), regardless of biological communities present.</p> <p>Subtidal chalk and peat and clay exposures are finite, irreplaceable habitats and which will not recover if physically damaged. Both habitats have low resilience and resistance to physical pressures, with penetration impacts in particular having the potential to permanently damage the structure of the habitat (Tillin et al. 2025).</p> | <p>Natural England advises that high sensitivity is recorded for impacts to peat and clay exposures and subtidal chalk.</p> <p>Natural England refers to previous advice issued in Appendix [REP3A-027] at Deadline 3a regarding outstanding issues for the quantification and assessment of impacts to peat and clay exposures and subtidal chalk.</p> <p>Natural England advises that commitments to avoid impacts to Section 41 habitats by micro-siting should be secured in the DCO, please see our R&I log, Tab C - DCO, point number C10.</p> |
| E5.2 | Section 2.9.32 | <p>Natural England notes that the sensitivity for reef features of the Thanet Coast SAC to temporary increases in suspended sediment concentration (SSC) and sedimentation has been updated from low to medium, in line with the precautionary principle.</p> | <p>While this resolves in part the R&I Log points E26, E41 and E45 regarding the sensitivity assessment for reef features to increases in SSC and sedimentation, we note however that the assessment itself has not been updated based on the increased sensitivity. Therefore, impacts to reef features remain outstanding.</p> |

Table 2: Natural England's Advice On: Benthic

| Document reviewed: [REP4-072] 7.7 (C) Marine Biosecurity Plan (Tracked Changes) | | | |
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| NE Ref | Section | Key Concern and/or Update | Natural England's Advice to Resolve Issue |
| E5.3 | Section 6 | Natural England welcomes the tracked changes provided regarding biosecurity measures and commitments. | Issue considered resolved. |

Table 3: Natural England's Advice On: Benthic

| Document reviewed: [REP4-090] 9.9.2 Outline Cable Specification and Installation Plan | | | |
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| NE Ref | Section | Key Concern and/or Update | Natural England's Advice to Resolve Issue |
| E5.4 | 1.1.9 and 1.1.10 | Natural England notes that the Cable Specification and Installation Plan (CSIP) approach is the same as that proposed for Eastern Green Link (EGL) 1 and 2. Having recently reviewed the first of these phases for EGL1, Natural England is not supportive of this approach, because in practice it means that the impacts from each of the phases can't be considered holistically and that impacts will have occurred prior to the final discharge of the Marine Licence condition. | Natural England advises that there are two CSIPs or two phases only. One for Horizontal Directional Drilling (HDD) landfall works and one for the rest of the offshore scheme works in totality. |
| E5.5 | 1.1.11, 3.3.7 and Section 7 | Natural England notes that Section 6 is referenced when Section 7 considers sediment disposal management. In Section 7.1.3 we also note that reference is made to disposal of excavated material from the exit pits being placed elsewhere within the order limits or removed. We advise that, if this were to happen, there is a risk of habitat change/loss of supporting habitat from the removed area and depending on | Natural England advises that an Outline Sandwave Levelling plan is provided to support the consenting process. And that further mitigation measures are committed to including (but not exclusively) placing dredged sediment, 50m away from <i>Sabellaria spinulosa</i> reef, within like for like sediment areas, adjacent to and updrift of the sandwave, and using a fall pipe to aid recovery and avoid impacts to sensitive benthic habitats. We also advise that further assessment is required to fully understand the potential impacts on near shore habitats and |

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| | | <p>location, at the disposal area. Thus potentially extending the impact footprint. In addition, there is a risk that insufficient excavated material would remain to support backfilling any exit pits with natural sediment, which is preferential.</p> <p>Furthermore, we note that pre-sweeping also known as sandwave levelling is mentioned for the whole of the offshore scheme. But there is limited discussion in relation to minimising impacts from suspended sediment and deposition of the sediment. To only reference avoidance of sensitive benthic habitats is not sufficient mitigation especially within or adjacent to designated sites.</p> | <p>features from sediment excavation and deposition, and the potential to support a more natural backfill of the exit pits.</p> |
| E5.6 | 1.1.12 and 1.1.13 | <p>Natural England highlights that any changes to named plans need to be signed off by regulators in consultation with relevant SNCB. And that the final CSIP should be informed by the results of the post construction monitoring.</p> | <p>Natural England advises that this section is updated to reflect these requirements to avoid conflicts in the post consent phase.</p> |
| E5.7 | 1.4 | <p>Natural England notes that where cable protection is required, water depth will be safeguarded.</p> | <p>Natural England advises that all locations for cable protection are considered not just where Grid Link is crossed.</p> |
| E5.8 | 2.3.3 | <p>Natural England notes that drilling fluid will be removed from the cofferdam where practical. However, we have raised concerns with this in Appendix J3A to our Deadline 3A submission</p> | <p>Natural England advises that further consideration is given to the containment of drilling fluids to ensure removability.</p> |
| E5.9 | 3.2 and 6 | <p>Natural England notes that monitoring requirements and commitments are insufficient within the named plans and are not reflective of the scale of environmental risk associated with the project.</p> <p>We also note that any monitoring included within the CSIP is from an engineering perspective.</p> | <p>Natural England has advised for several thematic areas for this project that an Offshore In-Principal Monitoring Plan (IPMP) is required at the consenting phase to include hypotheses which will be tested to considered residual environmental concerns. With survey detail provided at the post consent phase.</p> <p>We are aware that the Applicant considers this to be an Offshore Windfarm requirement and not a 'cables' one. We highlight that in the intervening time since Viking Link the</p> |

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| | | | submission of an IPMP has become best practice for all marine major casework. |
| E5.10 | 3.3.1 | Natural England is concerned that boulder clearance could occur without there being the appropriate checks and measures in place and that further impacts could occur from the placement of displaced boulders | Natural England advises that boulder clearance, placement and mitigation measures need to be considered further in this plan. And the final CSIP would then be signed off by the MMO in consultations with the relevant SNCB. The commitments should include the placement of boulders being in similar habitats and placed to be reflective of the surrounding habitats and not in a linear berms which have the potential to disrupt sediment transport. |
| E5.11 | 3.3.3 – 3.3.6 | UXO clearance | Natural England defers to our advice in Appendix F5 of our Deadline 5 submission |
| E5.12 | 4.1 | Natural England notes that installation activities will be 24/7, but the impacts of this and any associated noise and light disturbance considerations in named plans are not referenced | Natural England advises that, while this is not a benthic issue per se, references to assessments in named landfall documents should be included for completeness. Please see response to ExQ2 ECOL27 in Appendix K of our Deadline 5 submission. |
| E5.13 | 4.2 and 4.3 | Natural England is unclear if both the Simultaneous cable Lay and trenching/Burial (SLB) or the Post lay trenching of cables/burial (PLB) have been assessed and that commitments have been made to ensure that impact parameters will remain within those assessed in the ES chapters | Natural England advises that clarity is provided to ensure that the impact parameters of SLB and PLB will remain with those assessed in the ES. |
| E5.14 | 5 | Natural England notes that there is no specific commitments/consideration on the potential cable protection to be used | Natural England advises that cable protection which is most readily removable e.g., concrete mattresses and rock bags should be used within and adjacent to MPAs, especially where the risk of sediment transport disruption and changes to marine processes is high. |
| E5.15 | 5.15 | It is unclear to Natural England what is included within remediation works, noting that 12km is a considerable length of cable protection. It is also not clear how 15% of the cable route requiring cable protection has been determined and assessed with the ES Chapter. | Natural England advises that further information and clarity is provided and any documents updated accordingly to avoid ambiguity. |

Table 4: Natural England's Advice On: Benthic

| Document reviewed: [REP4-060] 6.11 (C) Marine Conservation Zone Assessment (Tracked Changes) | | | |
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| NE Ref | Section | Key Concern and/or Update | Natural England's Advice to Resolve Issue |
| E5.16 | 1.5.24 | Natural England notes that no evidence has been presented to support conclusions drawn i.e., that rock berms and/or concrete mattresses below 1m are unlikely to impact marine process and consequently impact on benthic features. Therefore, Natural England is unable to support these conclusions | Natural England advises that the Applicant should signpost to the evidence to support the MCZ assessment conclusions. |
| E5.17 | 1.5.25 | Natural England notes that no evidence has been presented to support conclusions drawn i.e., that rock placed 0.5m below the seabed will remain buried over the lifetime of the project and is unlikely to impact on Thanet Coast MCZ. Therefore, Natural England is unable to support these conclusions | Natural England advises that the Applicant should signpost to the evidence to support the MCZ assessment conclusions. |
| E5.18 | 1.5.29 | Natural England notes that no evidence has been presented to support conclusions drawn for Goodwin Sands MCZ. Therefore, Natural England is unable to support these conclusions | Natural England advises that the Applicant should signpost to the evidence to support the MCZ assessment conclusions. Noting that type, footprint, length, highlight and location of cable protection are all factors which influence impacts and should be considered within the assessment. Please also see Appendix D5 to our Deadline 5 submission. |

Table 5: Natural England's Advice On: Benthic

| Document reviewed: [REP4-102] 9.113 The Coralline Crag Technical Note | | | |
|--|----------------|--|--|
| NE Ref | Section | Key Concern and/or Update | Natural England's Advice to Resolve Issue |
| E5.19 | 1.1.2 | Natural England welcomes that the exit pits will be located outside of the continuous areas of Coralline Crag. However, we advise that prior to construction this will need to be confirmed in the CSIP and that | Natural England advises that commitments are included in the Register of Environmental Commitments (REAC) to secure this mitigation measure. |

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| | | avoidance is committed to in the Register of Environmental Commitments doc. | |
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Table 6: Natural England's Advice On: Benthic

| 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 |
| E5.20 | General Comment | <p>Natural England notes that there is no reference to OSPAR requirements to fully remove infrastructure at the time of decommissioning.</p> <p>Furthermore, we would welcome commitments for amendments/updates to the plan to be signed off by the MMO in consultation within the relevant SNCB</p> | <p>Natural England advises that all surface laid infrastructure (including cable protection) and cables at risk of becoming exposed are removed at the time of decommissioning and that the commitment should be made now to do this.</p> <p>We recognise that further OSPAR derogations cases can be applied for at the time of decommission and inform the final Decommissioning Plan, but for now we advise that best practice should be followed and OSPAR requirements committed to as a minimum.</p> |

Table 7: Natural England's Advice On: Benthic

| Document reviewed: [REP4-224] 7.5.2 Outline Offshore CEMP | | | |
|--|-----------------|---|--|
| NE Ref | Section | Key Concern and/or Update | Natural England's Advice to Resolve Issue |
| E5.21 | General Comment | All advice provided on REACs are also relevant to [REP4-234] Environmental Commitments | |
| E5.22 | General Comment | | Natural England advises that an outline Repair Preparedness plan should be provided at consent and assessed. With the final plan provided prior to construction. Otherwise, a separate marine licence will be required |
| E5.23 | REAC LVS05 | Natural England welcomes this commitment, but we note that the text in Section 2.3.3 of the CSIP doesn't align with this commitment | Natural England advises that the text in the CSIP is updated to align with this text. |

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| E5.24 | B42 | Natural England welcomes the commitment to undertake trenchless cable installation under the saltmarsh, any deviation from this post consent will require a DCO/dML change request. | None required by Applicant. |
| E5.25 | B59 | <p>Natural England welcomes the commitment for there to be a Landfall Method Statement (LMS) and Drill Fluid Management Plan (DFMP), but notes that the update to this commitment doesn't take account of advice provided in Appendix J3A to our Deadline 3A submission in regard to modifications to these plans being included within final plans agreed with MMO in consultation with NE prior to construction. This is important within Designated sites where NE are also a regulator.</p> <p>Natural England also advises that the Hydrofracture modelling should be included within and used to inform the LMS and DFMP.</p> | Natural England advises that this commitment and B68 is updated to reflect our regulatory advice. |
| E5.26 | B60 | Natural England highlights that the landfalls are within designated sites. Therefore there is a requirement for all plans, including contingency measures to manage incidents to be signed off by the LPA and/or MMO in consultation with relevant SNCB prior to construction. And again, real time ECoW check in with regulators and relevant SNCB remains a requirement to ensure that the contingency plan remains fit for purpose. | Natural advises that this commitment is updated to reflect our regulatory advice. |
| E5.27 | B67 and B69 | Natural England welcomes the commitment to use LGP vehicles, but there are no parameters provided. We also note the use of the Hoverport doesn't take into account the risks we raised at Deadline 4 in relation to increased damage to the site from its use, and disturbance buffers/separation distances not being sufficient. | Natural advises that this commitment is updated to reflect our regulatory advice. In addition, LGP vehicles should have a pressure lower than a human footprint. |

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| E5.28 | GH14 | We note that >45m is quoted in this commitment where as 50m is discussed in the CSIP [REP4-090] | Natural England advises that clarity is provided by the Applicant and plans should be updated accordingly. |
| E5.29 | LVS05 | Please see above comment. | |
| E5.30 | Table 1.7 General Marine | | We refer the Applicant and the ExA to our comments on the CSIP which are also relevant to Table 1.7 of the Outline Offshore CEMP. |
| E5.31 | Table 1.8 MPE06 | Natural England queries the alignment between the CEMP and the CSIP in relation to the use of the permanent rock bags | Natural England would welcome the documents/plans aligning, with all protection being only for the lifetime of the project where possible. |
| E5.32 | Table 1.9. BE06 | Natural England advises that the commitment to provide this post consent doesn't follow marine best practice for NSIPs and marine major casework. | Natural England advises that an Outline IPMP should be provided to support consent |

3. References

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

Tillin, H.M., Hill, J.M., Harris, O. & Tyler-Walters, H., 2025. Piddocks with a sparse associated fauna in sublittoral very soft chalk or clay. In Tyler-Walters H. *Marine Life Information Network: Biology and Sensitivity Key Information Reviews*, [on-line]. Plymouth: Marine Biological Association of the United Kingdom. [cited 18-02-2026]. Available from: <https://www.marlin.ac.uk/habitat/detail/152>