



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Sea Link Energy Cable

Appendix G5 to the Natural England Deadline 5 Submission

Natural England's Additional Comments on Offshore Ornithology

For:

The construction and operation of the Sea Link Energy Cable.

Planning Inspectorate Reference EN020026

11th March 2026

Appendix G5- Natural England's advice on documentation related to Offshore Ornithology

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

- [REP4-058] 6.6 (F) Habitats Regulations Assessment Report

Natural England has also reviewed the following documents and noted the changes, but has no further comment on them:

- [REP3-027] 6.4.4.5 (C) ES Figures Marine Ornithology
- [REP3-069] 9.73 Applicant's Responses to First Written Questions
- [REP3-070] 9.73.1 Applicant's Responses to First Written Questions – Appendices
- [REP4-052] 6.4.4.5 (D) ES Figures Marine Ornithology
- [REP4-082] 9.85 Applicant's Comments on Other submissions Received at Deadlines 3 and 3A.

1. Summary

Natural England's primary concern for marine ornithology is potential vessel-related disturbance impacts to red-throated diver (RTD) a feature of the Outer Thames Estuary (OTE) Special Protection Area (SPA). Natural England is becoming increasingly concerned in relation to disturbance of red-throated divers from the more persistent presence of OWF-related vessels and could make a meaningful contribution to in-combination effects on the OTE SPA. As a result of this we advise that there is a likely significant effect from the proposals alone and in-combination which should be considered in more detail in the Appropriate Assessment.

Natural England welcomes the Applicant's proposed seasonal restriction (Nov 1–Mar 31) to avoid impacts. However, we note that this has not been fully applied, specifically, the pre-laying grapnel run (PLGR) occurs from Jan 1 - Mar 31, overlapping with RTD presence and risking displacement. Additionally, restrictions currently apply only within the SPA. Natural England recommend extending a 2 km buffer beyond the seaward boundary of the OTE SPA to account for vessel disturbance and advise that inclusion of the updated restrictions is essential to mitigate Adverse Effect on Integrity (AEoI). We advise that all mitigation measures should be secured within a named plan/document.

2. Detailed Comments

Table 1: Natural England's detailed comments on Offshore Ornithology

Document reviewed: [REP4-058] 6.6 (F) Habitats Regulations Assessment Report			
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	Section 5.3.5, pg. 86.	Natural England notes that the Applicant summarises the <u>offshore</u> scheme impacts by stating 'the Suffolk <u>Onshore</u> Scheme will result in LSE 'in combination' with other Projects'.	Natural England assumes that the Applicant is referencing the Offshore scheme and therefore all named plans should be updated where required.
2	Section 8.3, Sections 8.3.14-17, pg. 131	Natural England re-iterates comments in Appendix G4 [REP4-193] ref. 3 at Deadline 4 concerning the omission of the export cable laying for North Falls OWF from the in-combination assessment for OTE SPA. Noting that for all the other projects screened in that might contribute effects on RTD in OTE SPA in-combination the Applicant has already acknowledged that simultaneous or protracted cable laying from multiple projects could increase vessel activity and disturbance/displacement of RTD in the OTE SPA.	<p>Natural England advises that unless it can be appropriately justified by the Applicant, cable laying work for North Falls OWF should be included in the in-combination impact assessment as advised in Appendix G4 [REP4-193] ref. 3 at Deadline 4.</p> <p>Natural England advises that the mitigation planned for cables works both during construction and operation and maintenance activities could eliminate any contribution to RTD disturbance from their cable laying activities, if the seasonal restriction offered as mitigation, is adhered to in full.</p> <p>Natural England also re-emphasise that the seasonal restriction proposed as mitigation will only remove any in-combination effect if impacts from the Pre-Lay Grapnel Run</p>

			can be shown to make no meaningful contribution to those effects or is included within the seasonal restriction.
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