

Date: 13<sup>th</sup> April 2026  
Our ref: 533364  
Your ref: EN020026



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**BY EMAIL ONLY**

Dear Sir/Madam,

## **Sea Link Energy Cable**

The following constitutes Natural England's formal statutory response for Examination Deadline 6.

### **1. Natural England's Deadline 6 Submissions**

An update of Natural England's position and advice in relation to documents relevant to our remit is provided in the Appendices listed below.

Natural England notes that a large volume of complex material continues to be submitted at each deadline, much of which has been amended and/or superseded by subsequent submissions. This has made document review and the formulation of advice particularly challenging. At the Applicant's request (during meeting on 26<sup>th</sup> February 2026), throughout our responses we have also sought, to set out what we consider necessary to resolve outstanding matters.

A full list of documents reviewed for each thematic area is included below in Annexes 1-2, listed within each Appendix for detailed comments and summarised within the Risks and Issues Log.

The Appendices submitted by Natural England at Deadline 6 are as follows:

- EN020026 533364 Sea Link Energy Cable Appendix A6 - Natural England's Advice on Suffolk Onshore - Deadline 6.
- EN020026 533364 Sea Link Energy Cable Appendix B6 - Natural England's Advice on Kent Onshore - Deadline 6.
- EN020026 533364 Sea Link Energy Cable Appendix D6 - Natural England's Advice on Marine Physical Environment - Deadline 6.
- EN020026 533364 Sea Link Energy Cable Appendix E6 - Natural England's Advice on Benthic - Deadline 6.
- EN020026 533364 Sea Link Energy Cable Appendix F6 - Natural England's Advice on Marine Mammals - Deadline 6.
- EN020026 533364 Sea Link Energy Cable Appendix G6 - Natural England's Advice on Offshore Ornithology - Deadline 6.
- EN020026 533364 Sea Link Energy Cable Appendix H6 - Natural England's Advice on Suffolk LVIA - Deadline 6.
- EN020026 533364 Sea Link Energy Cable Appendix K6 – Natural England's Response to ExA Q3 – Deadline 6.
- EN020026 533364 Sea Link Energy Cable Appendix M6 – Natural England's Response to the REIS – Deadline 6.
- EN020026 533364 Sea Link Energy Cable - Natural England Risk & Issues Log - Deadline 6.

Please note that we have not provided an Appendix J at Deadline 6 covering the issues raised for the Kent Intertidal. Despite reviewing all relevant/new information provided by the Applicant, no changes can be made to our previous advice and position as no material changes have been made to the application in line with our previous advice. Therefore, the remaining concerns in relation to the Kent Intertidal continue to be carried forward in the Risk and Issue Log (Tab J) submitted at Deadline 6. However, it is anticipated that our position on some issues may change following a meeting with the Applicant on 16th April 2026.

## **Overarching comments**

### **1. Further Engagement with the Applicant**

Alongside our regular monthly meetings with the Applicant, we have also arranged a series of topic specific meetings with our relevant specialists throughout the beginning of April. These are to ensure engagement and opportunities for discussions around issue resolution and final

positions as we approach the end of the examination period. However, this is predicated on provision of requested outstanding information/analysis. The meetings will centre around the key topics where there is value in discussions and outstanding concerns including offshore ornithology, physical processes, benthic and intertidal ecology and LVIA.

On the 26<sup>th</sup> of February 2026 Natural England had a general project update meeting with the Applicant to discuss outstanding issues. In our Cover Letter at Deadline 5 [REP5-214] we provided confirmation to the Applicant via email on the 6<sup>th</sup> March that Natural England would not expect further sediment modelling to be provided at this stage in Examination but provided some caveats to highlight the uncertainties around the lack of analysis. This advice was reiterated in our Deadline 5 response for completeness and to ensure transparency. We note from the Deadline 5 submission from the Applicant that they have decided to undertake the further sediment modelling which we welcome and will endeavour to review as soon as the information is available, recognising time constraints around the final deadline for the Examination timetable.

For transparency, Natural England offered to assist the Applicant on 26<sup>th</sup> of February 2026 in acquiring the Reach et al 2013 paper to aid in providing the assessments that have been requested throughout examination. Unfortunately, due to the paper not being within the public domain we were unable to send the paper directly. We met with the Applicant to discuss offshore ornithological matters on the 1<sup>st</sup> April to aid the resolution of final outstanding issues. Updates on our position regarding marine ornithology matters can be found in Appendix G6.

In addition to our submission to Deadline 6 Natural England has also provided a further narrative to the Applicant around our position regarding LVIA to aid understanding. This was sent ahead of the Deadline via email to the Applicant on the 2<sup>nd</sup> April and can also be found as an Annex to Appendix H6 for completeness.

## **2. Future commitments and wording within the DCO/DMLs**

In terms of commitments to future consultation with the relevant SNCBs for various commitments, we wish to raise that the conditions within the DCO/DMLs should be concise and clear to avoid ambiguity. It is noted that in places it is stated that future consultation with the relevant SNCB's will be agreed "as appropriate". We wish to highlight that it is not appropriate for such commitments to be vague. (For example, please see [REP4-241] which suggests that contractor(s) would prepare a HDD landfall Method Statement and Drilling Fluid Management Plan in consultation with NE, KWT and the RSPB "as appropriate".)

## **2.1 Wording of the DCO**

Natural England wishes to raise concern that the definition of “commence” has been amended and trial trenching has been specifically excluded from this definition on Page 6 Article 1 of the DCO and Page 189, Schedule 16 (Deemed Marine Licence (dML)), Condition 1 of REP5-006. We note from the schedule of changes that this change was made following discussion with marine stakeholders. We have no record of being consulted on this change. However, we have concerns that excluding trial trenching from the definition of commence could allow some impactful activities to be taken within the intertidal area without the need to submit the required mitigation plans and with no need for approvals. This is of particular concern to the works in the Pegwell Bay area. We note that without understanding of what is involved in trial-trenching it is difficult to advise on the full risk and potential for impact.

Natural England also notes the further change to Schedule 16 Part 2 Condition 4 which confirms trial trenching will be excluded from the Cable Specification and Installation Plan.

Natural England does not support the exclusion of trail trenches from the definition of commence. However, we do welcome the removal of offshore preparation works from the definition of commence and note this addresses our original concerns with this definition.

## **2.2 Wording of the Register of Environmental Actions and Commitments (REAC)**

Reference is made throughout Table 3.4 of REP5-118 to commitments being secured through Requirement 6 and the need to submit an Offshore Environmental Management Plan. However, Requirement 6 has no such plan listed, and it is Natural England’s advice that as these matters relate to offshore works the appropriate enforcing body would be the MMO and therefore, they should be secured through condition within Schedule 16, of the dML. Additionally Natural England has raised concerns regarding the detailed mitigations within the REAC please see further detail in Appendices, D6 and E6.

Natural England also notes that REP5-118 links to Requirement 5 and the Red-Throated Diver protocol in Requirement 5. While this requirement and plan do exist; we again advise that that these mitigations should be located within Schedule 16 as it is an offshore mitigation plan.

## **3. ISH Queries**

**Action Point 1 for all parties to** *“Submit any suggested drafting (whether relating to matters raised in ExQ3 or not) which you consider should be included in the draft Development Consent Order (dDCO), with reasons why you consider it is necessary.”:*

Natural England has provided a commentary on our outstanding issues within the draft DCO and associated documents. We have endeavoured to point to relevant examples of wording

within existing DCOs. However, we defer to the MMO on the drafting of conditions within the dML and note that condition drafting is out with our statutory remit and responsibility.

**Action point 71 for the Applicant to “Confirm with Natural England whether effects identified as likely to give rise to Adverse Effects on Integrity (AEoI) can be ruled out before close of examination, or provide relevant information to inform a derogation case (for example, in respect of impacts on RTD due to emergency cable breaks/repairs) as required by NPS EN-1.”:**

We note this action point and have agreed to a series of meetings with the Applicant where much of this may be covered. However, we also note that our response to the RIES Appendix A6 has further detail on our current position with regards to all designated sites (particularly within Annex 1 of Appendix A6).

#### **4. Minor Comments**

Natural England also wishes to highlight that when using tracked changes in the updated versions of documents, that using a bright contrasting colour is best to ensure easy identification of changes. In the REAC [REP5-116] the colour of the tracked changes is a subtle green/grey that is easy to miss, particularly when reviewing the large volumes included within Examination.

Natural England expects that a number of documents will be submitted by the Applicant at Deadline 6. We will undertake best endeavours to respond to any relevant additional documentation by Deadline 7.

For any queries relating to the content of this letter please contact us using the details provided below.

Yours faithfully

Sustainable Development, East Midlands Area Team

**Annex 1: Natural England's Response to the Applicant's Documents Submitted at Deadline 4 Relevant to our Remit**

<b>PINS Document Reference</b>	<b>Document Name</b>	<b>Natural England's Response/Position Summary</b>
REP4-077	7.5.7.1 (C) Outline Landscape and Ecological Management Plan - Suffolk (Tracked Changes)	Natural England's response to this document is provided in Appendix A6
REP4-092	9.94 (A) Planning Statement Addendum	Natural England's response to this document is provided in Appendix H6
REP4-216	Late Deadline 4 Submission - Accepted at the discretion of the Examining Authority - 9.38.5.1 Deadline 4A Cover Letter	Natural England has no comments to make on this document
REP4-220	Late Deadline 4 Submission - Accepted at the discretion of the Examining Authority - 3.2 (F) (Deadline 4A) Explanatory Memorandum (Tracked)	Natural England has no comments to make on this document
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)	Natural England's response to this document is provided in Appendix D6, E6, F6 and G6
REP4-228	Late Deadline 4 Submission - Accepted at the discretion of the Examining Authority - 9.7 (E) Schedule of Changes to the Draft Development Consent Order (Tracked)	Natural England has reviewed and provided comments on changes to the DCO within our cover letter and our Risks and Issues Log.
REP4-242	Late Deadline 4 Submission - Accepted at the discretion of the Examining Authority - 9.86 (B) Applicant's Comments on Other Submissions Received at Deadlines 3 and 3A (Tracked Changes)	Natural England's response to this document is provided in Appendix F6 and G6

**Annex 2: Natural England's Response to the Applicant's Documents Submitted at Deadline 5 Relevant to our Remit**

<b>PINS Document Reference</b>	<b>Document Name</b>	<b>Natural England's Response/Position Summary</b>
REP5-001	9.38.6 Deadline 5 Cover Letter	Natural England has no comments to make on this document

REP5-002	2.3 (F) Land Plans Part 1 of 2	Natural England has no comments to make on this document
REP5-003	2.3 (F) Land Plans Part 2 of 2	Natural England has no comments to make on this document
REP5-004	2.9.2 (B) Habitats of Protected Species and Important Habitats - Kent	Natural England has no comments to make on this document
REP5-006	3.1 (H) draft Development Consent Order (Tracked)	Natural England's response to this is provided in Section 2.1 of the Cover Letter
REP5-007	3.2 (G) Explanatory Memorandum (Tracked Changes)	Natural England has no comments to make on this document
REP5-016	4.3 (F) Book of Reference (Tracked Changes)	Natural England has no comments to make on this document
REP5-018	6.2.3.2 (F) Part 3 Kent Chapter 2 Ecology and Biodiversity (Tracked Changes)	Natural England has no comments to make on this document
REP5-020	6.2.4.1 (F) Part 4 Marine Chapter 1 Physical Environment (Tracked Changes)	Natural England's response to this document is provided in Appendix D6
REP5-022	6.2.4.2 (E) Part 4 Marine Chapter 2 Benthic Ecology (Tracked Changes)	Natural England's response to this document is provided in Appendix E6
REP5-024	6.2.4.4 (H) Part 4 Marine Chapter 4 Marine Mammals (Tracked Changes)	Natural England's response to this document is provided in Appendix F6
REP5-026	6.2.4.7 (D) Part 4 Marine Chapter 7 Shipping and Navigation (Tracked Changes)	Natural England has no comments to make on this document
REP5-028	6.3.2.2.1 (B) ES Appendix Nighttime Bat Walkover and Static Detector Survey Report (Tracked)	Natural England has no comments to make on this document. Please see response to ExQs in Appendix K6 to our Deadline 6 submission in relation to bats
REP5-033	6.4.4.5 (E) ES Figures Marine Ornithology (Tracked Changes)	Natural England has no comments to make on this document
REP5-037	6.6 (G) Habitats Regulations Assessment Report (Tracked Changes)	Natural England's response to this document is provided in Appendix A6, D6, E6, F6, and G6
REP5-039	6.11 (D) Marine Conservation Zone Assessment (Tracked Changes)	Natural England's response to this document is provided in Appendix D6 and E6
REP5-067	7.5.2 (C) Outline Offshore Construction Environmental Management Plan (Tracked Changes)	Natural England's response to this document is provided in Appendix E6, F6 and G6

REP5-069	7.5.3 (C) Outline Onshore Construction Environmental Management Plan (Tracked Changes)	Natural England's response to this document is provided in Appendix H6
REP5-075	7.5.6.1 (D) Outline Air Quality Management Plan - Suffolk (Tracked Changes)	Natural England has no comments to make on this document
REP5-077	7.5.6.2 (C) Air Quality Management Plan - Kent (Tracked Changes)	Natural England has no comments to make on this document
REP5-079	7.5.12 (C) Outline Offshore Invasive Non-Native Species Management Plan (Tracked Changes)	Natural England's response to this document is provided in Appendix E6
REP5-081	7.8 (B) Red Throated Diver Protocol (Tracked Changes)	Natural England's response to this document is provided in Appendix G6
REP5-084	9.17.1 (B) Suffolk Drainage Strategy (Tracked Changes)	Natural England has no comments to make on this document
REP5-086	9.17.2 (B) Kent Drainage Strategy (Tracked Changes)	Natural England has no comments to make on this document
REP5-107	9.7 (F) Applicant's Schedule of Changes to the Draft Development Consent Order (Tracked Changes)	Natural England's response to this document is provided within Section 2 of the Cover Letter
REP5-111	9.76.5.7 (B) Change Request Appendix G Tree Survey Report Schedule Extract Suffolk Onshore Scheme (Tracked Changes)	Natural England has no comments to make on this document
REP5-112	9.76.5.8 (B) Change Request Appendix H Tree Constraints Plans Suffolk Onshore Scheme	Natural England has no comments to make on this document
REP5-113	9.76.5.8 (B) Change Request Appendix I Tree Protection Plans Suffolk Onshore Scheme	Natural England has no comments to make on this document
REP5-114	9.77 (G) Application and Examination Document Tracker	Natural England has no comments to make on this document
REP5-116	9.84 (C) Register of Environmental Actions and Commitments (REAC) (Tracked Changes)	Natural England's response to this document is provided in Section 2.2 of the Cover Letter and in Appendix B6, E6, F6 and H6
REP5-118	9.92 (B) Outline Cable Specification and Installation Plan (Tracked Changes)	Natural England's response to this document is provided in Appendix D6 and E6
REP5-124	9.102 Operational Noise Contour Plan for Minister Converter Station	Natural England has no comments to make on this document
REP5-125	9.107 Applicant's Response to Suffolk County Councils Deadline 4 Submission on Alternate Access to Saxmundham Converter Station	Natural England has no comments to make on this document

REP5-126	9.108 Applicant's Response to January Hearing Action Points from Compulsory Acquisition Hearing 1 and Issue Specific Hearing 2	As previously advised, Natural England will not comment on the Applicant's comments unless specifically requested to do so.
REP5-127	9.108.1 Applicant's Response to January Hearing Action Points (CAH1 and ISH2) - Appendices	As previously advised, Natural England will not comment on the Applicant's comments unless specifically requested to do so.
REP5-128	9.115.1 Outline Materials and Waste Management Plan - Suffolk	Natural England has no comments to make on this document.
REP5-129	9.115.1 Outline Materials and Waste Management Plan - Kent	Natural England has no comments to make on this document
REP5-131	9.119 Applicant's Comments on Late Responses to ExA First Written Questions	Natural England's response to this document is provided in Appendix A6, B6, F6, H6
REP5-132	9.121 Applicant's Comments on Other Submissions Received at Deadline 4	Natural England's response to this document is provided in Appendix F6, G6 and H6
REP5-133	9.121.1 Applicant's Comments on Other Submissions Received at Deadline 4 - Appendix A	Natural England's response to this document is provided in Appendix B6, F6, G6 and H6
REP5-135	9.123 Applicant's Responses to Second Written Questions	Natural England's response to this document is provided in Appendix F6, G6 and H6
REP5-136	9.123.1 Applicant's Responses to Second Written Questions - Appendices	Natural England's response to this document is provided in Appendix F6 and H6
REP5-137	9.124 Landscape and Visual Nighttime Assessment	Natural England's response to this document is provided in Appendix H6
REP5-139	9.126 Areas of Safeguarded Water Depth - Consideration of Additional Installation Requirements	Natural England's response to this document is provided in Appendix E6, F6 and G6
REP5-143	9.130 Groundwater Heat Pollution - Technical Note (Clean)	Natural England has no comments to make on this document