



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Sea Link Energy Cable

**Appendix E6 to the Natural England Deadline 6 Submission
Natural England's Intertidal and Benthic Ecology Advice**

For:

The construction and operation of Sea Link Energy Cable

Planning Inspectorate Reference EN020026

13th April 2026

Appendix E6 Sea Link Deadline 6 Benthic Ecology

In formulating these comments, the following documents have been considered

Sea Link Deadline 5 Submission Documents

- **[REP5-022]** – 6.2.4.2 (E) Part 4 Marine Chapter 2 Benthic Ecology (Tracked Changes)
- **[REP5-037]** – 6.6 (G) Habitats Regulations Assessment Report (Tracked Changes)
- **[REP5-039]** – 6.11 (D) Marine Conservation Zone Assessment (Tracked Changes)
- **[REP5-067]** – 7.5.2 (C) Outline Offshore Construction Environmental Management Plan (Tracked Changes)
- **[REP5-079]** – 7.5.12 (C) Outline Offshore Invasive Non-Native Species Management Plan (Tracked Changes)
- **[REP5-116]** – 9.84 (C) Register of Environmental Actions and Commitments (REAC) (Tracked Changes)
- **[REP5-118]** – 9.92 (B) Outline Cable Specification and Installation Plan (Tracked Changes)
- **[REP5-131]** – 9.119 Applicant's Comments on Late Responses to ExA First Written Questions
- **[REP5-132]** - 9.121 Applicant's Comments on Other Submissions Received at Deadline 4
- **[REP5-133]** - 9.121.1 Applicant's Comments on Other Submissions Received at Deadline 4
- **[REP5-135]** - 9.123 Applicant's Responses to Second Written Questions
- **[REP5-136]** 9.123.1 Applicant's Responses to Second Written Questions - Appendices
- **[REP5-139]** – 9.126 Areas of Safeguarded Water Depth - Consideration of Additional Installation Requirements

- **Minor comments**

Minor updates provided to reviewed documents only.

Natural England notes for REP5-022 – 6.2.4.2 (E) Part 4 Marine Chapter 2 Benthic Ecology (Tracked Changes), the only update relates to addition of rock bags as an option for Horizontal Directional Drilling (HDD) exit points at both landfall locations, to supplement the existing option of concrete mattresses (Table 2.17; 2.9.65). No response from Natural England is considered necessary and no other relevant tracked changes have been provided.

Natural England notes for REP5-079 – 7.5.12 (C) Outline Offshore Invasive Non-Native Species Management Plan (Tracked Changes), tracked changes are also added to include the potential use of rock bags (as above), and provides greater detail on Kent landfall works (Table 1.3). Whilst an increase in temporary disturbance areas is recorded, this text is consistent with already present text within REP5-022 so is not considered new and tracked changes are ensuring consistency across documents. No other relevant tracked changes have been provided.

2. Detailed comments:

Table 1: Natural England's Advice On: Benthic Ecology

Document reviewed: [REP5-118] 9.92 (B) Outline Cable Specification and Installation Plan (Tracked Changes)			
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	2.2.4	Natural England welcomes the exclusion of cofferdams from the Suffolk Coast landfall. However, this needs to be secured in the REAC.	Natural England advises that once this is secured in the REAC this issue would be considered resolved.
2	3.3.4	Natural England notes the Unexploded Ordinance (UXO) surveys in April -June 2026 will not feed into examination.	N/A
3	3.3.9 and 6.1.1	Natural England notes that prior to cable installation significant lengths of sandwave levelling is proposed e.g. 6km and 17km. We highlight that this is not insignificant. We also highlight that sand wave levelling is proposed during the operational phase of the project to maintain Depth of Lowering. This is not something that has been proposed on any other project, highlighting cable integrity risks.	Natural England is concerned about the scale of the sandwave levelling proposed in specific locations and implications this may have marine processes and sandwave recovery. We seek further clarification from the Applicant on the adoption of the mitigation measures we have advised in previous submissions to ensure sandwave recoverability, especially given the case specific proposal to sandwave level throughout the operational phase.
4	4.3.8	Natural England notes the proposed addition of a backhoe dredger. Natural England is not supportive of their use within benthic Marine Protected Areas (MPAs) or intertidal supporting habitats for Special Protection Areas (SPAs) due to the resulting leg depressions from jack-up legs and changes to intertidal and benthic communities. This is greater than faunal mortality raised at ExQ 3BE9. We also highlight that in [REP5-135] ExQ 2BE2 that the Applicant has concluded a small magnitude of impact from these vessels but has not provided any assessment of depth and footprint of the leg depressions within particular habitats or evidence of duration of impact other than <2 years. Natural England notes that evidence from Dudgeon OWF, Lincs OWF and Triton	Natural England would be content for a barge to bottom out in intertidal areas to avoid the use of jack-up vessels. If this were committed to by the Applicant, and the use of jack-up vessels within benthic MPAs avoided, this issue would be resolved.

		Knoll OWF has demonstrated that jack-up leg depressions have persisted and impacts have occurred for 2-10 years.	
5	5.1.4	Natural England highlights that considerable lengths of cable protection are proposed, e.g. 20km between KP38 and 58 and 15km between KP81.5 and 96.5. It is not clear if these will be continuous lengths of projection or not. It is also noted that this is greater than required for other projects.	Natural England advises that further clarity is required on the proposals and if this is just during construction. Until we have this clarification it is difficult to assess benthic and marine processes impacts.
6	5.1.5 and 5.16	Natural England notes the requirement to avoid microplastic entering the marine environment. Whilst this is welcomed it is worth noting that when considering cable protection this may not be possible at all locations. Where removability of cable protection within designated sites is paramount, in order to avoid increasing impacts during decommissioning this would currently require the use of concrete mattresses with hoops and/or rock bags. However, we do note there is now technology to make rock bags out of rock and not be reliant on bags manufactured from plastic.	Natural England advises that this is considered further in the final Cable Specification and Installation Plan (CSIP) prior to construction and that commitments to considered this then are included within the REAC.
7	Section 6	Natural England notes that there is no assessment of the activities and impacts during the operational and maintenance phase of the project. Reference is made to a repair preparedness plan/s, but these have not been provided.	Natural England advises that if operations and maintenance (O&M) activities are not included and assessed in the CSIP please could the Applicant signpost to where this is provided. Or alternatively, we advise that a separate O&M licence will be required.
8	Section 9	Pollution and Waste Management: This links to the HDD management plan. We suggest that this section of the CSIP is insufficient to sign off any management of HDD related impacts.	Natural England advises sign posting to the HDD management plan rather than summarising here and creating ambiguity as to the requirements relating to this matter.

Table 2: Natural England's Advice On: Benthic

Document reviewed: [REP5-039] – 6.11 (D) Marine Conservation Zone Assessment (Tracked Changes)			
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	1.5.25 and 1.5.28	Natural England continues to have concerns in relation to the disruption of sediment transport and changes to marine processes associated with Goodwin Sands Marine Conservation Zone (MCZ).	Please refer to Appendix D6 and Natural England's response to ExQ 3PE2 in Appendix K6 to our Deadline 6 submission in relation to sediment transportation and conclusions in relation to Goodwin Sands MCZ.

Table 3: Natural England's Advice On: Benthic

Document reviewed: [REP5-067] – 7.5.2 (C) Outline Offshore Construction Environmental Management Plan (Tracked Changes)			
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	NEW Section on Env. Monitoring	Natural England highlights that the commitments should be included in a separate Offshore In Principle Monitoring Plan (IPMP).	
2	NEW Section on Env. Monitoring	Natural England highlights the difference between residual effect and residual concern due to uncertainties and therefore the need to monitoring residual concerns to demonstrate the predictions of the ES. Natural England has advised multiple times in our previous responses where further monitoring and post construction monitoring is required.	Please see our response to ExQ3 3BE2 in Appendix K6 to our Deadline 6 submissions.
3	BE06	Natural England notes that the 'when' is missing from the commitment and as currently written, this is not enforceable.	Natural England advises that this REAC is strengthened to set out when the In-Principle Monitoring Plan (IPMP) will be submitted and agreed with the MMO in consultation with the relevant SNCBs. The aim of monitoring is not to verify the accuracy of predicted residual impacts on these

			habitats, but to demonstrate the successfulness of mitigation measures.
4	BE05	Natural England notes that as written this REAC doesn't commit to avoiding NERC habitats where possible and where not possible what the mitigation measures will be to minimise impacts.	Natural England advises that this REAC is updated in line with commitments made on other marine NSIPs.
5	1.10.16	Natural England notes that a Drilling Fluid Management Plan will be developed post consent.	Natural England continues to advise that an outline HDD plan is provided at the time of consent. E.g. North Falls.
6	1.10.19	Natural England advises against the use of sandbags to contain drilling fluid on saltmarsh as they compact the sediment and damage vegetation where they are placed and through transportation to the frac-out location. Thus, they cause impacts in their own right. Containment is also likely to result in increased smothering depths which is likely to result in increased damage to saltmarsh vegetation.	Natural England advises that no containment is likely to be the best solution within saltmarsh habitat. However, as with North Falls, a decision tree of action is required to demonstrate the decision making process.
7	1.10.19	Natural England continues to be concerned about the placement of drilling fluid directly on the seabed within the curtilage of the cofferdam.	Natural England advises that further information is required with regards to any remaining drilling fluids i.e. amounts, area, depth and likely recovery time of supporting habitat for SPA birds.
8	Table 8	GH10 – Drilling Fluid Management plan/HDD management plan.	Natural England advises that an outline plan is provided now.
9	Table 8	B59 – same issues as before.	Please see previous Natural England advice in Appendix E5 [REP5-218], Table 7, NE Ref: E5.25
10	Table 8	B09 – Natural England advises that within intertidal habitats we do not want cementitious grout filling to seal fractures as until demonstrated otherwise this could create an area of sediment which over time will erode differently to the surrounding habitats.	Natural England advises that this requirement is removed unless evidence can be provided to demonstrate that this will not become a resistant area.
11	Table 8	MPE10 – Natural England advises that mechanical backfill and what is meant by this is not permitted until further clarity is provided to understand what exactly is meant by this. Currently this is too ambiguous.	Natural England requires further details on what is meant by mechanical backfill before we can agree that this is an effective mitigation measure.

12	1.12.5	Natural England notes that the IPMP is proposed to be provided post consent, which is effectively a post construction monitoring plan. An IPMP is used to set out hypothesis to be tested and outcomes to be demonstrated. Not specifically survey design etc.	Natural England advises that an IPMP is provided as part of the consent. We have included examples of other IPMPs to support the Applicant: EN010119-001756-7.10 Offshore In-Principle Monitoring Plan Rev 5 (Clean).pdf Offshore In Principle Monitoring Plan .
13	1.13.2	Natural England notes that in relation to when the placement of cable protection can occur <u>in Sandwich Bay Special Area of Conservation (SAC)</u> , but no other designated site.	Natural England requests that the text is amended to relate to all benthic MPAs and supporting habitats for SPA.

Table 4: Natural England's Advice On: Benthic

Document reviewed: [REP5-116] – 9.84 (C) Register of Environmental Actions and Commitments (REAC) (Tracked Changes)			
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	General Comment	Please see comments on the OCEMP which also related to this document.	
2	MPE09	While we welcome the monitoring proposed for the River Stour low water channel in Pegwell Bay, but advise the proposed monitoring should be captured in an IPMP and further details provided regarding its scope, aims, threshold of change, triggers for intervention etc.	Natural England refer to Appendix D6 to our Deadline 6 Submission for further information on this

Table 5: Natural England’s Advice On: Benthic

Document reviewed: [REP5-139] – 9.126 Areas of Safeguarded Water Depth - Consideration of Additional Installation Requirements			
NE Ref	Section	Key Concern and/or Update	Natural England’s Advice to Resolve Issue
1	Table 2.1	Natural England is concerned that sediment from sandwave levelling will be re-distributed to ensure no backfill of swept areas.	<p>Please see Table 1 Point 3 above on sandwave levelling mitigation and Natural England’s position on this.</p> <p>Please also see comments included in Appendix D6 to our Deadline 6 submissions in relation to indirect impacts to designated sites from proposed activities which are also relevant to this document</p>