



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Sea Link Energy Cable

Appendix F6 to the Natural England Deadline 6 Submission

Natural England's Additional Comments on the Marine Mammals

For:

The construction and operation of the Sea Link Energy Cable.

Planning Inspectorate Reference EN020026

13th April 2026

Appendix F6 – Natural England’s advice on documentation related to Marine Mammals received at Deadlines 4 and 5

In formulating our advice, the following documents have been considered in relation to the impacts of the Sea Link Energy Cable on marine mammals:

- **[REP5-024]** 6.2.4.4 (H) Part 4 Marine Chapter 4 Marine Mammals
- **[REP5-037]** 6.6 (G) Habitats Regulations Assessment Report
- **[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 - Appendix A
- **[REP5-135]** 9.123 Applicant's Responses to Second Written Questions

The following documents have been reviewed with no comment:

- **[REP4-224]** 7.5.2 (B) Outline Offshore Construction Environmental Management Plan (Tracked)
- **[REP4-242]** 9.86 (B) Applicant's Comments on Other Submissions Received at Deadlines 3 and 3A
- **[REP5-067]** 7.5.2 (C) Outline Offshore Construction Environmental Management Plan (Tracked Changes)
- **[REP5-116]** 9.84 (C) Register of Environmental Actions and Commitments (REAC) (Tracked Changes)
- **[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

1. Summary

Natural England continues to advise that the in-combination assessment requires more information, as detailed below, to make it robust and representative. We highlight that further detail is required for the percentage disturbance figures in combination with Five Estuaries, and that offshore windfarms cannot be discounted in relation to the effects of underwater noise on Harbour Porpoise.

Natural England recognises that many outstanding issues have now been resolved and hope that further issues will have been resolved upon review of the Applicant's Deadline 6 submissions in conjunction with external meetings held with the Applicant to resolve outstanding issues.

Table 1: Natural England’s detailed comments on Marine Mammals

Documents reviewed:			
<ul style="list-style-type: none"> • [REP5-024] 6.2.4.4 (H) Part 4 Marine Chapter 4 Marine Mammals • [REP5-037] 6.6 (G) Habitats Regulations Assessment Report 			
NE Ref	Section	Key Concern and/or Update	Natural England’s Advice to Resolve Issue
1		Natural England notes that assessment is updated to reference the current Effective Deterrent Range (EDR) guidance, disturbance figures for cetaceans to reflect the reduced EDR figure of 3km have been included.	R&I F3 and F2: Whilst this is resolved for cetaceans; the same information is still required for both seal species as stated in Appendix F5. To resolve the Applicant needs to provide the calculation for total number disturbed and the percentage of management unit population impacted.
2		Natural England notes that assessment is updated to reference the most recent National Marine Fisheries Service (NMFS) sound exposure criteria.	We welcome the update to the more recent criteria. Natural England is concerned about changes to approach (Marine mammal chapter version H) in Table 19 [REP5-024] removing Permanent Threshold Shift (PTS) and the addition in Table 20 of a reduced sound level for SBP. This does not follow the standard approach and would normally require further discussion. However, we note for this project (only) that the outcome is not affected as the JNCC standard mitigation will still be in place and so F14 from the R&I log can be considered closed.
3		Natural England notes that additional detail has been provided on noise modelling.	Natural England has reduced the risk rating of this issue (F15) to yellow. This reflects the stage of the examination and a case specific risk review and does not represent a change in Natural England’s view on importance of empirical noise modelling. Our Advice has taken into consideration that further assessment will be required for the UXO works

			after consent and advise the empirical underwater noise modelling should be undertaken to inform that future assessment. This issue is considered to be resolved.
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Table 2: Natural England’s detailed comments on the Habitats Regulations Assessment Report

Documents reviewed:			
<ul style="list-style-type: none"> [REP5-037] 6.6 (G) Habitats Regulations Assessment Report 			
NE Ref	Section	Key Concern and/or Update	Natural England’s Advice to Resolve Issue
4		Natural England notes the HRA has been updated to include specific disturbance figure for Lion Link.	R&I F31, F33 Progressed- Natural England welcomes that updated figures for Lionlink have been provided and agrees that OWF’s will make up the majority of impacts. However, we advise that all projects which have noise impacts that may overlap should be included in the in-combination assessment.
5		Natural England notes the HRA has been updated to information on 5 Estuaries	Natural England advises that a finding of no AEoI does not mean there are no residual impacts, rather that alone they don’t affect site integrity. Therefore, the percentage disturbance figures must be included in the in-combination assessment.

Table 3: Natural England’s comments on the In-combination Assessment

Documents reviewed:			
NE Ref	Section	Key Concern and/or Update	Natural England’s Advice to Resolve Issue
<ul style="list-style-type: none"> • [REP5-037] 6.6 (G) Habitats Regulations Assessment Report • [REP5-133] 9.121.1 Applicant's Comments on Other Submissions Received at Deadline 4 - Appendix A • [REP5-135] 9.123 Applicant's Responses to Second Written Questions 			
6		Natural England notes that additional information on in combination assessment have been provided.	Natural England is NOT satisfied that an AEoI of the Southern North Sea SAC can be excluded from in-combination effects of underwater noise to harbour porpoise. Whilst we welcome the updated figures for this project and LionLink and agree that OWF’s will make up the majority of the in-combination impact we do not agree that OWFs can be disregarded. HRAs require that all projects, that include noise generating activities which could overlap, regardless of scale are included in the in-combination assessment. While the Applicant may contend that Sea Link’s contribution is of limited significance, the obligation to undertake a full assessment persists.
7		After review of the Applicant’s response in relation to R&I log F1, F2, F6 and F8 [REP5-133] Natural England considers these issues resolved.	N/A

Table 4: Natural England’s detailed comments on Noise Modelling

Documents reviewed:			
<ul style="list-style-type: none"> • [REP5-024] 6.2.4.4 (H) Part 4 Marine Chapter 4 Marine Mammals • [REP5-037] 6.6 (G) Habitats Regulations Assessment Report • [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 			
NE Ref	Section	Key Concern and/or Update	Natural England’s Advice to Resolve Issue
8		Natural England notes that additional detail has been provided on noise modelling.	Natural England has reduced the risk rating on issue F15 to yellow. This reflects the stage of the examination and a case specific risk review and does not represent a change in Natural England’s view on importance of empirical noise modelling. Our Advice has taken into consideration that further assessment will be required for the UXO works after consent and advise the empirical underwater noise modelling should be undertaken to inform that future assessment. This issue is now closed.

Table 5: Natural England’s detailed comments on other issues

Documents reviewed:			
<ul style="list-style-type: none"> • [REP5-133] 9.121.1 Applicant's Comments on Other Submissions Received at Deadline 4 - Appendix A • [REP5-135] 9.123 Applicant's Responses to Second Written Questions 			
NE Ref	Section	Key Concern and/or Update	Natural England’s Advice to Resolve Issue

9		After review of the Applicant's response in relation to R&I log F1, F2, F6 and F8 [REP5-133] Natural England considered these issues resolved	N/A
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