

Date: 29th April 2026
Our ref: 533366
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 7.

1. Natural England's Deadline 7 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 significant volume of complex material was submitted by the Applicant at Deadline 6 (13 April). As at previous deadlines, a substantial proportion of this material has been amended and/or superseded by subsequent submissions, while also introducing new risks and issues. This approach has materially increased the difficulty of effective document review and the timely formulation of advice.

A particular procedural matter arising at Deadline 7 relates to the short notice and substantial volume of work required in response to the Rule 17 Letter. Given that the Examination timetable provides for no further deadlines and that the Examination is scheduled to close on 5 May, Natural England anticipates that no further substantive advice will be required prior to the close of Examination. In this context, the opportunity to respond to any significant additional requests at this advanced stage of the Examination process has effectively

concluded from Natural England perspective.

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

The Appendices submitted by Natural England at Deadline 7 are as follows:

- EN020026 533366 Sea Link Energy Cable Appendix A7 - Natural England's Advice on Suffolk Onshore - Deadline 7.
- EN020026 533366 Sea Link Energy Cable Appendix B7 - Natural England's Advice on Kent Onshore - Deadline 7.
- EN020026 533366 Sea Link Energy Cable Appendix D7 - Natural England's Advice on Marine Physical Environment - Deadline 7.
- EN020026 533366 Sea Link Energy Cable Appendix E7 - Natural England's Advice on Benthic - Deadline 7. **To be sent 30th April.**
- EN020026 533366 Sea Link Energy Cable Appendix F7 - Natural England's Advice on Marine Mammals - Deadline 7.
- EN020026 533366 Sea Link Energy Cable Appendix G7 - Natural England's Advice on Offshore Ornithology - Deadline 7.
- EN020026 533366 Sea Link Energy Cable Appendix H7 - Natural England's Advice on Suffolk LVIA - Deadline 7.
- EN020026 533366 Sea Link Energy Cable Appendix K7 – Natural England's Response to the Rule 17 letter – Deadline 7.
- EN020026 533366 Sea Link Energy Cable Appendix L7- Standard Advice on In Principle Monitoring Plan
- EN020026 533366 Sea Link Energy Cable - Natural England Risk & Issues Log - Deadline 7. **To be sent 30th April.**

Please note that we have not provided an Appendix J at Deadline 7 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 7. Natural England met with the Applicant on 16th April 2026, whilst it was anticipated that our position on some issues may change following a meeting, the outcome remains that amendments are likely to be included by the Applicant within Deadline 7 documents.

Please note Appendix E7 and our updated Risks and Issues Log will be sent tomorrow (30th April 2026). Due to the high volume of work and staff availability it has not been possible to complete these documents by the deadline.

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 April which have continued between Deadline 6 and 7. These were to ensure engagement and opportunities for discussions around issue resolution and final positions as we approach the end of the Examination period. The meetings have centred around the key topics where there is value in discussions and outstanding concerns including offshore ornithology, physical processes, benthic and intertidal ecology and LVIA.

As demonstrated in Appendix G7, the meeting with the Applicant has already delivered positive outcomes for offshore ornithology, with key issues successfully resolved. We are confident that, given additional time, similar progress would have been achieved for physical processes and benthic and intertidal ecology. In this respect, the Applicant is likely to provide important updates at Deadline 7. However, there is unfortunately no opportunity to respond to these at this stage.

2. In Principle Monitoring Plan (IPMP)

Natural England welcomes the submission of the Sea Link In Principle Monitoring Plan (IPMP). We refer the Applicant to Natural England's Best Practice Advice document which sets out our expectations in terms of monitoring. This document is available at: [Environmental considerations for offshore wind and cable projects - Phase IV Best Practice Advice for Post-Consent Monitoring, Version 1.0, July 2022.pdf](#). Relevant sections are also included in Appendix L7 for reference.

This document outlines Natural England's overarching views on the Outline IPMP [REP6 - 116], particularly in relation to the overall aim of ensuring adaptive monitoring and remediation is secured within the DCO.

Aim of the IPMP

1. Natural England advises that this is a live document which is updated throughout post consent to reflect the outcome of discussions and/or monitoring.

2. In recognition of the emphasis being placed by projects currently in the post consent phase on the IPMP when setting the monitoring requirements and parameters; Natural England highlights the importance of this document. Natural England emphasises the requirement to agree on the scope of the IPMP and hypotheses which will be tested by the monitoring as part of the consenting phase.
3. Overall, Natural England feels that more detail could be provided in the IPMP in its current form. For example;
 - What are the hypotheses the monitoring will be testing, and how do they relate to the assessments undertaken in the ES?
 - How will the monitoring be designed to ensure that the desired outcomes can be achieved, i.e., is the monitoring fit for purpose?
 - What are the indicative timings of the surveys?
 - Can lessons be learnt from previous thematic surveys and how will modifications to survey design be incorporated between survey campaigns?
 - What does 'success' look like to demonstrate that no further monitoring is required?
 - What happens if the results do not support the null hypothesis? Is further monitoring required (with/without modifications)? If impacts are greater than predicted, do actions need to be undertaken to address these impacts? How will further monitoring and actions be secured? Is a change to the wording of the dML required? And if so, how will success of any action/s be monitored and what will be the success criteria before monitoring can cease?

To answer the above, Natural England considers the IPMP should focus on what the uncertainties and evidence gaps of the EIA and/or HRA are, rather than repeating the outcomes of the EIA only. We consider that establishing and agreeing the uncertainties and evidence gaps of the EIA and/or the HRA is necessary to inform what monitoring should be undertaken.

4. Natural England advises an approach mechanism in which the Applicant presents a clearly defined hypothesis, or null hypothesis of no impact would be beneficial. Monitoring thereafter would aim to test this. We advise a review period during which Statutory Nature Conservation Bodies (SNCBs) and regulatory bodies such as the Marine Management Organisation (MMO) are consulted by the Applicant to assess the results of the first period of monitoring. For example, one mechanism that could

be introduced for particular receptors would be a live document which is reflective of what the monitoring is observing, including consideration of species/habitat recovery.

5. We advise that monitoring should be effective in providing sufficient evidence pre-construction to inform the deployment of mitigation measures and similarly demonstrate the efficacy of mitigation measures during construction and post-construction. This is important to demonstrate compliance with the measures identified in assessments to mitigate significant impacts. It is also important to provide evidence to assess the significance of adverse effects, evaluate the success of mitigation measures, and to help inform whether further remedial measures are required.
6. In relation to remedial measures, Natural England wishes to highlight the importance of ensuring that all relevant monitoring proposals for North Falls (and/or associated DCO/dML conditions) consider the aim of securing a mechanism for **adaptive monitoring** when unforeseen impacts are detected. Thus, ensuring remedial measures (**i.e., adaptive management**) are triggered should the results of monitoring demonstrate impacts that are significantly greater than predicted and/or incorrect assumptions were made following review of the conclusions of the environmental statement and supporting documents. We advise that the potential for certain monitoring to trigger the development of countermeasures (with associated monitoring of those measures) should be clearly stated in relevant tables of the IPMP and incorporated into the DCO conditions where relevant.

3. **Request for Agreed Position Statements from Examining Authority in Rule 17 Letter**

Natural England acknowledges that there was a request within the Rule 17 Letter for joint position statements to be agreed between Natural England and the Examining Authority for LVIA and Marine Mammals areas of concern. Given the very limited timeframe we have worked within the constraints to provide the following:

- LVIA: Following a meeting with the Applicant on the 21 April 2026 we have provided a position statement from Natural England summarising the key points within Appendix H7 and also sent this to the Applicant on the 28th April 2026. For further detailed advice please see our Deadline 6 response, Appendix H6 [REP6-248] and our Deadline 7 Risk and Issues Log Tab H.

- Marine Mammals: Following a meeting with JNCC on the 27th April 2026 we have provided an agreed joint position statement between Natural England and JNCC to the Applicant (27 April 2026) - please see Appendix F7 to our Deadline 7 response point 2 for the joint position statement and please refer to our Risk and Issues Log Tab F for a detailed breakdown of the outstanding concerns.

4. New Issues raised at Deadline 7.

Having received such a large quantity of new and updated information from the Applicant at Deadline 6 and in light of the advanced stage of the Examination, we are unable to agree the amendments prior to the close of the Examination. We also highlight that changes in design parameters have also been included by the Applicant which we are seeing for the first time at Deadline 6 for example use of a hovercraft.

With such a short duration for review and limited information provided for each, Natural England has not had a full right to reply to these issues.

Where possible we have suggested additional commitments to be included, where appropriate, should consent be granted. This approach would ensure that agreement can be reached following consent and hopefully assist the Examining Authority.

These issues include the following which can be found in the Risk and Issue Log and associated Appendices:

- A) The impacts from the Minster and Saxmundham Converter Stations to the designated sites for both Kent and Suffolk Onshore concerns;
- B) The impacts from the proposed UXO to the designated sites for both Kent and Suffolk Onshore concerns;
- C) The need for the Applicant to provide an Outline Operations and Maintenance Plan and for the REAC to be secured through condition under the DML for the DCO concerns;
- D) The impacts from disposal of an additional 75,000m³ of pre-sweeping sediment from the Sunk Pilot Boarding Area anywhere in the cable corridor with potential impacts on sensitive areas of seabed/benthic habitats in terms of the Physical Environment concerns;
- E) The impacts from the use of a hovercraft during emergencies in Pegwell Bay and the added risk of disturbance to the interest features of the SPA in terms of the Benthic, Offshore Ornithology and Marine Mammal Concerns.

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 6 Relevant to our Remit

PINS Document Reference	Document Name	Natural England's Response/Position Summary
REP6-001	9.38.7 Deadline 6 Cover Letter	Natural England has no comment to make on this document.
REP6-002	2.3 (G) Land Plans Part 1 and 2	Natural England has no comment to make on this document
REP6-003	2.7 (C) Access, Rights of Way and Public Rights of Navigation Plans	Natural England has no comment to make on this document
REP6-004	The Examining Authority's (ExA) Consultation draft Development Consent Order Schedule of ExA recommended amendments to the Applicant's DCO submitted at Deadline 6	Natural England's response to this document is provided in Appendix C7
REP6-005	3.1 (I) draft Development Consent Order (Tracked Changes)	Natural England's response to this document is provided in Appendix C7 and D7
REP6-007	3.2 (H) Explanatory Memorandum (Tracked Changes)	Natural England has no comment to make on this document.
REP6-015	4.3 (G) Book of Reference - (Tracked Changes)	Natural England has no comment to make on this document.
REP6-017	6.11 (E) Marine Conservation Zone Assessment (Tracked Changes)	Natural England's response to this document is provided in Appendix D7 and E7.
REP6-019	6.2.2.2 (E) Part 2 Suffolk Chapter 2 Ecology and Biodiversity (Tracked Changes)	Natural England's response to this document is provided in Appendix A7
REP6-025	6.2.3.2 (G) Part 3 Kent Chapter 2 Ecology and Biodiversity (Tracked Changes)	Natural England's response to this document is provided in Appendix B7
REP6-027	6.2.4.1 (G) Part 4 Marine Chapter 1 Physical Environment (Tracked Changes)	Natural England's comments on this document are provided in Appendix D7.
REP6-029	6.2.4.2 (F) Part 4 Marine Chapter 2 Benthic Ecology (Tracked Changes)	Natural England's comments on this document are provided in Appendix D7 and E7.
REP6-031	6.2.4.4. (I) Part 4 Chapter 4 Marine Mammals (Tracked Changes)	Natural England's response to this document is provided in Appendix F7.

REP6-033	6.2.4.5 (D) Part 4 Chapter 5 Marine Ornithology (Tracked Changes)	Natural England's response to this document is provided in Appendix G7.
REP6-045	6.4.4.1 (E) ES Figures Marine Physical Environment (Tracked Changes)	Natural England's comments on this document are provided in Appendix D7.
REP6-051	6.6 (H) Habitats Regulations Assessment Report (Tracked Changes)	Natural England's response to this document is provided in Appendix A7, B7, D7, E7, F7, G7, and H7.
REP6-055	7.1 (D) Planning Statement (Tracked Changes)	Natural England has no comment to make on this document.
REP6-057	7.12.1 (C) Design Principals - Suffolk (Tracked Changes)	Natural England has no comment to make on this document
REP6-059	7.12.2 (C) Design Principals - Kent (Tracked Changes)	Natural England has no comment to make on this document from a Kent Onshore Perspective
REP6-067	7.5.10.1 (B) Outline Soil Management Plan - Suffolk (Tracked Changes)	Natural England's response to this document is provided in Appendix A7
REP6-069	7.5.10.2 (B) Outline Soil Management Plan - Kent (Tracked Changes)	Natural England's response to this document is provided in Appendix B7
REP6-071	7.5.11 (D) Outline Marine Mammal Mitigation Plan (Tracked Changes)	Natural England has no comments to make on this document.
REP6-073	7.5.2 (D) Outline Offshore Construction Environmental Management Plan (Tracked Changes)	Natural England's response to this document is provided in Appendix D3, E7, F7 and G7.
REP6-075	7.5.3 (D) Outline Onshore Construction Environmental Management Plan (Tracked Changes)	Natural England's comments on this document are provided in Appendix B7 and H7
REP6-077	7.5.6.1 (E) Outline Air Quality Management Plan - Suffolk (Tracked Changes)	Natural England has no comment to make on this document
REP6-079	7.5.7.1 (D) Outline Landscape and Ecological Management Plan - Suffolk (Tracked Changes)	Natural England has no comment to make on this document
REP6-081	7.5.7.2 (D) Outline Landscape and Ecological Management Plan - Kent (Tracked Changes)	Natural England has no comment to make on this document
REP6-083	7.5.8.1 (C) Outline Construction Noise and Vibration Management Plan - Suffolk (Tracked Changes)	Natural England has no comments to make on this document.
REP6-085	7.5.8.2 (C) Outline Construction Noise and Vibration Management Plan - Kent (Tracked Changes)	Natural England has no comment to make on this document

REP6-087	7.5.9.1 (B) Outline Public Rights of Way Management Plan - Suffolk (Tracked Changes)	Natural England has no comments to make on this document.
REP6-089	7.5.9.2 (B) Outline Public Rights of Way Management Plan - Kent (Tracked Changes)	Natural England has no comment to make on this document
REP6-091	7.8 (C) Red Throated Diver Protocol (Tracked Changes)	Natural England's response to this document is provided in Appendix G7.
REP6-093	9.101 (B) Kent Onshore Scheme - Fluvial Flooding from the River Stour (Tracked Changes)	Natural England has no comment to make on this document
REP6-095	9.104 (B) Areas of Safeguarded Water Depth Plan (Tracked Changes)	Natural England's comments on this document are provided in Appendix D7.
REP6-098	9.110 Inter-Project Cumulative Effects Assessment Update - Technical Note	Natural England has no comment to make on this document
REP6-102	9.123.1 (B) Applicant's Responses to Second Written Questions - Appendices (Clean)	As advised in our cover letter on our Relevant reps and Deadline 1 response, Natural England will not reply to comments on comments although we do review them where relevant. However, notwithstanding this, at this deadline we have not had sufficient time to review this document due to the Rule 17 letter. We have, however, engaged with the Applicant in a series of meetings to consider their position.
REP6-103	9.123.1 (B) Applicant's Responses to Second Written Questions - Appendices (Tracked Changes)	No time to review. As above at REP6-102.
REP6-105	9.13 (D) Pegwell Bay Construction Method Technical Note (Tracked Changes)	Natural England's comments on this document are provided in Appendix D7.
REP6-106	9.131 Applicant's Comments on Responses to Second Written Questions	No time to review: As above at REP6-102.
REP6-107	9.132 Applicant's Written Summary of Oral Submissions at Compulsory Acquisition Hearing 2	No time to review: As above at REP6-102.
REP6-108	9.133 Applicant's Written Summaries of Oral Submissions at Issue Specific Hearing 3	No time to review: As above at REP6-102.
REP6-109	9.134 Applicant's Comments on Other Submissions Received at Deadline 4 and Deadline 5	No time to review: As above at REP6-102.

REP6-110	9.135 Applicant's Response to March Hearing (CAH2 and ISH3) Action Points	No time to review: As above at REP6-102.
REP6-111	9.136 Applicant's Responses to Third Written Questions	No time to review: As above at REP6-102.
REP6-112	9.136.1 Applicant's Responses to Third Written Questions - Appendices	No time to review: As above at REP6-102.
REP6-113	9.137 Applicant's Response to Legal Submissions from Objector Groups - SEAS, KWT, CPRE Kent, and Save Minister Marshes	No time to review: As above at REP6-102.
REP6-114	9.138 Applicant's Written Response to Open Floor Hearing 3	No time to review: As above at REP6-102.
REP6-115	9.139 Applicant's Responses to the Questions in the RIES	No time to review: As above at REP6-102.
REP6-116	9.140 Outline In-Principle Monitoring Plan	Natural England's comments on this document are provided in Appendix D7 and E7 and within this cover letter.
REP6-119	9.143 Pegwell Bay Saltmarsh Limits Topographic Survey March 2026	Natural England's comments on this document are provided in Appendix D7.
REP6-120	9.144 Additional Sediment Dispersion Modelling - Technical Note	Natural England's comments on this document are provided in Appendix D7.
REP6-122	9.147 Outline Operational Lighting Management Plan	Natural England's response to this document is provided in Appendix A7 and B7.
REP6-123	9.148 Hoverport Construction Access Noise Modelling - Technical Note	Natural England has no comment to make on this document
REP6-130	9.7 (G) Applicant's Schedule of Changes to the Draft Development Consent Tracked Changes	Natural England's comments on this document are provided in Appendix C7
REP6-133	9.77 (H) Application and Examination Document Tracker	Natural England has no comments to make on this document.
REP6-135	9.84 (D) Register of Environmental Actions and Commitments (REAC) (Tracked Changes)	Natural England's response to this document is provided in Appendix A7, B7, C7, D7, E7, F7, G7, and H7.
REP6-137	9.92 (C) Outline Cable Specification and Installation Plan (Tracked Changes)	Natural England's comments on this document are provided in Appendix D7 and E7.
PD-024	ExA's Consultation dDCO - Schedule of recommended amendments to the applicants dDCO ([REP6-004])	Natural England's comments on this document are provided in Appendix C7

