



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Sea Link Energy Cable

Appendix B7 to the Natural England Deadline 7 Submission

Natural England's Additional Comments on the Kent Onshore Aspects

For:

The construction and operation of the Sea Link Energy Cable.

Planning Inspectorate Reference EN020026

29th April 2026

Appendix B7 – Natural England’s Advice on documentation relating to Kent Onshore Ecology.

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

- **[REP6-025]** 6.2.3.2 (G) Part 3 Kent Chapter 2 Ecology and Biodiversity (Tracked Changes)
- **[REP6-051]** 6.6 (H) Habitats Regulations Assessment Report (Tracked Changes)
- **[REP6-069]** 7.5.10.2 (B) Outline Soil Management Plan - Kent (Tracked Changes)
- **[REP6-075]** 7.5.3 (D) Outline Onshore Construction Environmental Management Plan (Tracked Changes)
- **[REP6-081]** 7.5.7.2 (D) Outline Landscape and Ecological Management Plan - Kent (Tracked Changes)
- **[REP6-122]** 9.147 Outline Operational Lighting Management Plan
- **[REP6-135]** 9.84 (D) Register of Environmental Actions and Commitments (REAC) (Tracked Changes)

Natural England has reviewed but has no comments to make on the following documents:

- **[REP6-003]** 2.7 (C) Access, Rights of Way and Public Rights of Navigation Plans
- **[REP6-059]** 7.12.2 (C) Design Principals - Kent (Tracked Changes)
- **[REP6-085]** 7.5.8.2 (C) Outline Construction Noise and Vibration Management Plan - Kent (Tracked Changes)
- **[REP6-089]** 7.5.9.2 (B) Outline Public Rights of Way Management Plan - Kent (Tracked Changes)
- **[REP6-093]** 9.101 (B) Kent Onshore Scheme - Fluvial Flooding from the River Stour (Tracked Changes)
- **[REP6-098]** 9.110 Inter-Project Cumulative Effects Assessment Update - Technical Note
- **[REP6-123]** 9.148 Hoverport Construction Access Noise Modelling - Technical Note

1. Summary

- ECOW: Whilst we note at B02, within the REAC there is reference to appointment of an Ecological Clerk of Works to undertake a thorough check of all vegetation for any signs of breeding activity before potentially disturbing work proceeds; there remains no requirement to works stop if necessary to avoid disturbance to breeding birds. We continue to ask the Applicant to update the Register of Environmental Actions and Commitments (REAC) to include reference to this measure under further commitments: B45, B50 and B65.
- Breeding Season: We also continue to advise that the Breeding Season is updated appropriately to state March - September inclusive as it is inconsistent throughout the documents

Once these actions are completed, we would consider the issues resolved.

Additional Information

Natural England also highlights the concern that new information has been added to REP6-025 and REP6-051 at this late stage of the Examination period. We have tailored our advice accordingly, given the information and evidence made available to us.

i) UXO

Natural England notes that additional information provided relates to the need for a terrestrial unexploded ordnance (UXO) investigation at the Minster Station and Substation site and other locations close to the Sandwich Bay to Hacklinge Marshes SSSI. Given the mitigation measures proposed, around timing for example, we advise that the Register of Environmental Actions and Commitments (REAC) is updated to include an additional requirement for the UXO investigation and disposal to give confidence that impacts to the designated site will be avoided or minimised.

ii) Outfall discharges

Natural England welcomes the clarity provided in relation to the outfall discharges from Minster Converter Station. With this new information provided by the Applicant at Deadline 6 we advise that a robust water quality monitoring programme, including measurements of biological and

chemical parameters, for any discharged water is implemented to support the Applicant's conclusions and ensure that runoff does not result in further impacts to the sites.

As above, as this matter has come to light late in the Examination, we advise that these measures are secured through an additional, appropriately worded REAC commitment detailing the chemical and biological parameters that the discharged water will meet and how this will be monitored and managed throughout the lifetime of the project.

2. Detailed Comments

Table 1: Natural England's advice on REP6- 025

Document reviewed: [REP6-025] 6.2.3.2 (G) Part 3 Kent Chapter 2 Ecology and Biodiversity (Tracked Changes)			
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	2.9.31	Breeding season in last sentence of this section is incorrectly stated as March to August.	All references to the bird breeding season should be updated to March – September (inclusive).
2	2.9.35 2.10.2	These Sections have been updated to include a suitably qualified ornithologist to check for breeding birds during July to September, for any works with noise levels above 60dBLAmax associated with construction of the Minster Converter Station and Substation.	Natural England welcomes this change which is in line with our previous advice.
3	2.9.37	Natural England notes that additional text has been included regarding the need for a terrestrial unexploded ordnance (UXO) investigation at the Minster Station and Substation site and other locations close to the Sandwich Bay to Hacklinge Marshes SSSI.	<p>Given the mitigation measures proposed, around timing for example, we advise that the Register of Environmental Actions and Commitments (REAC) is updated to include an additional requirement for the UXO investigation and disposal to give confidence that impacts to the designated site will be avoided or minimised.</p> <p>To minimise the likely impact to designated sites, Natural England advises that the UXO investigations should be undertaken outside of the core wintering and breeding bird season. This should then ensure that any required detonation will be undertaken within the least disturbing period of the year for birds associated with the designated sites.</p>

			As this matter has come to light late in the Examination, we advise that these measures are secured through an appropriately worded REAC commitment.
5	2.9.219, 2.9.221, 2.9.222?	Natural England notes the additional information has been provided which details that discharge outfalls associated with the Minster Converter Station would have a downstream connection to the Thanet Coast and Sandwich Bay SPA and Ramsar site. It is stated that 'The outfalls will only carry surface water runoff, following attenuation, and it will not therefore be contaminated or contain pollutants'.	<p>Natural England welcomes the clarity provided in relation to the discharges. With this new addition we advise that a robust water quality monitoring programme, including measurements of biological and chemical parameters, for any discharged water is implemented to support the Applicant's conclusions and ensure that runoff does not result in further impacts to the sites.</p> <p>As this matter has come to light late in the Examination, we advise that these measures are secured through an additional, appropriately worded REAC commitment detailing the chemical and biological parameters that the discharged water will meet and how this will be monitored and managed throughout the lifetime of the project.</p>

Table 2: Natural England's comments on [REP6-051]

Document reviewed: [REP6-051] 6.6 (H) Habitats Regulations Assessment Report (Tracked Changes)			
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	4.4.43	The updated Habitats Regulations Assessment includes new information confirming that 'there are outfalls associated with the Minster Converter Station which would discharge to a tributary of the River Stour and thus have a downstream connection to the Thanet Coast & Sandwich Bay SPA/Ramsar and Sandwich Bay SAC. The outfalls will only carry surface water	As this matter has come to light late in the Examination, we advise that the measures detailed above in Table 1, Point 5 are secured through an additional, appropriately worded REAC commitment detailing the chemical and biological parameters that the discharged water will meet and how this will be monitored and managed throughout the lifetime of the project.

	<p>runoff, following attenuation, and it will not therefore be contaminated or contain pollutants’.</p> <p>The applicant details that with the use of SuDS (as detailed within commitment W11 of the Register of Environmental Actions and Commitments) ‘there will be no water quality impacts from surface water runoff’.</p>	
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Table 3: Natural England’s Comments on [REP6-069]

Document reviewed: [REP6-069] 7.5.10.2 (B) Outline Soil Management Plan - Kent (Tracked Changes)			
NE Ref	Section	Key Concern and/or Update	Natural England’s Advice to Resolve Issue
1	Ex1.1.4	Natural England welcomes the commitment to undertake further soil surveys to fill in any gaps in the ALC information and to inform the finalised soil management plan post-consent.	N/A

Table 4: Natural England’s comments on [REP6-075]

Document reviewed: [REP6-075] 7.5.3 (D) Outline Onshore Construction Environmental Management Plan (Tracked Changes)			
NE Ref	Section	Key Concern and/or Update	Natural England’s Advice to Resolve Issue
1	Table 7.1, REAC Ref B45	Breeding season in last sentence of this section is incorrectly stated as March to August.	It remains Natural England’s advice that the bird breeding season should be March to September inclusive, and that any works which are

			likely to disturb breeding birds should be timed to avoid these months wherever practicable. All references to the bird breeding season should be updated to March – September (inclusive).
2	Table 7.1, REAC B50	This Section has been updated to include a suitably qualified ornithologist to check for breeding birds during July to September, for any works with noise levels above 60dBLAmax associated with construction of the Minster Converter Station and Substation.	Natural England welcomes this change which is in line with our previous advice. We consider issues with REAC B50 resolved.
3	Table 7.1, REAC B75 and B76	Natural England welcomes the addition of REAC commitments B75 and B76, which secure ecology survey updates prior to vegetation clearance and avoidance of lighting vegetated areas respectively.	N/A

Table 5: Natural England's comments on REP6-081

Document reviewed: [REP6-081] 7.5.7.2 (D) Outline Landscape and Ecological Management Plan - Kent (Tracked Changes)			
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	3.3.5 Bullet Point 3, Dash 1 and 2	Breeding season in this section is incorrectly stated as March to August.	It remains Natural England's advice that the bird breeding season should be March to September inclusive, and that any works which are likely to disturb breeding birds should be timed to avoid these months wherever practicable.

2	3.3.5 Bullet Point 3, Dash 3	This Section has been updated to include a suitably qualified ornithologist to check for breeding birds during July to September, for any works with noise levels above 60dBLAmax associated with construction of the Minster Converter Station and Substation.	Natural England welcomes this change which is in line with our previous advice. We consider issues with REAC B50 resolved.
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Table 6: Natural England's comments on REP6-122

Document reviewed: [REP6-122] 9.147 Outline Operational Lighting Management Plan			
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	4.1	Natural England welcomes the provision of an Outline Operational Lighting Management Plan and the design principles therein, which include minimal lighting levels within the footprint of the sites, directed to the interior, with measures to minimise light spill onto immediately surrounding habitat.	N/A

Table 7: Natural England's comments on [REP6-135]

Document reviewed: [REP6-135] 9.84 (D) 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	B45	Breeding season in last sentence of this section is incorrectly stated as March to August.	It remains Natural England's advice that the bird breeding season should be March to September inclusive, and that any works which are

			<p>likely to disturb breeding birds should be timed to avoid these months wherever practicable.</p> <p>Whilst we note at B02, within the REAC there is reference to appointment of an Ecological Clerk of Works to undertake a thorough check of all vegetation for any signs of breeding activity before potentially disturbing work proceeds; there remains no requirement to works stop if necessary to avoid disturbance to breeding birds. We continue to ask the Applicant to update the Register of Environmental Actions and Commitments (REAC) to include reference to this measure and the use of an ECoW within B5 B50 and B65.</p> <p>If B02 is updated to include a stop order then this would resolve this matter.</p> <p>We ask that the Register of Environmental Actions and Commitments (REAC) is updated to include reference to this measure under B45 and B65 (similarly to how commitment B50 has been worded, for example). Provided that works are timed to avoid the breeding bird season wherever practicable, and an ECoW is appointed to oversee all relevant works, Natural England will be satisfied no significant impact upon the Sandwich Bay to Hacklinge Marshes SSSI due to installation of overhead line pylons or works causing noise levels above 60dB Lamax at the boundary of the SSSI will result.</p>
2	B02	Breeding season is incorrectly stated as March to August.	It remains Natural England's advice that the bird breeding season should be March to September inclusive.
3	B50	This Section has been updated to include a suitably qualified ornithologist to check for breeding birds during July to September, for any works with noise levels above 60dBLamax associated with construction of the Minster Converter Station and Substation.	Natural England welcomes this change which is in line with our previous advice. We consider issues with REAC B50 resolved.

4	B65	This Section continues to incorrectly state the breeding season as March – August.	It remains Natural England’s advice that the bird breeding season should be March to September inclusive.
5	B44	Natural England welcomes the changes made for this commitment, which clarify that disturbance mitigations to noise sensitive receptors apply particularly to the Sandwich Bay to Hacklinge Marshes SSSI and birds.	N/A
6	B48	Natural England welcomes the changes made to this commitment, which provides a suitably qualified ecologist to support decision-making around construction activities that may cause disturbance to nesting Cetti’s warbler.	N/A
7	B55	Natural England welcomes the changes made to this commitment, which clarifies that bird diverters on new sections of overhead line will be visible at night.	N/A