



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Sea Link Energy Cable

**Appendix E7 to the Natural England Deadline 7 Submission
Natural England's Intertidal and Benthic Ecology Advice**

For:

The construction and operation of Sea Link Energy Cable

Planning Inspectorate Reference EN020026

29th April 2026

Appendix E7 Sea Link Deadline 7 Benthic Ecology

In formulating these comments, the following documents have been considered, but may not be directly referred in this appendix

Sea Link Deadline 6 Submission Documents

- **[REP6-017]** 6.11 (E) Marine Conservation Zone Assessment (Tracked Changes)
- **[REP6-027]** 6.2.4.1 (G) Part 4 Marine Chapter 1 Physical Environment (Tracked Changes)
- **[REP6-029]** 6.2.4.2 (F) Part 4 Marine Chapter 2 Benthic Ecology (Tracked Changes)
- **[REP6-045]** 6.4.4.1 (E) ES Figures Marine Physical Environment (Tracked Changes)
- **[REP6-051]** 6.6 (H) Habitats Regulations Assessment Report (Tracked Changes)
- **[REP6-073]** 7.5.2 (D) Outline Offshore Construction Environmental Management Plan (Tracked Changes)
- **[REP6-105]** 9.13 (D) Pegwell Bay Construction Method Technical Note (Tracked Changes)
- **[REP6-116]** 9.140 Outline In-Principle Monitoring Plan
- **[REP6-119]** 9.143 Pegwell Bay Saltmarsh Limits Topographic Survey March 2026
- **[REP6-120]** 9.144 Additional Sediment Dispersion Modelling - Technical Note
- **[REP6-135]** 9.84 (D) Register of Environmental Actions and Commitments (REAC) (Tracked Changes)
- **[REP6-137]** 9.92 (C) Outline Cable Specification and Installation Plan (Tracked Changes)
- **[REP6-139]** 9.96 (C) Water Depth Baseline Study Shipping and Navigation Technical Note (Tracked)
- **[PD-024]** ExA's Consultation dDCO - Schedule of recommended amendments to the applicants dDCO ([REP6-004

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 there has not been sufficient time to review **[REP6-106]**, **[REP6-108]**, **[REP6-111]**, **[REP6-115]**, from a benthic perspective due to the additional Rule 17 letter. We have, however, engaged with the Applicant in a series of meetings to consider their position.

1. Summary

Natural England notes that there are promising updates that have been made to REP6-029 regarding the quantification of Section 41 habitats and impacts, which we welcome. However, further updates are required to resolve the outstanding concerns within the Risks and Issues Log (see submission at Deadline 7). Whilst we welcome the outline In Principle Monitoring Plan (IPMP) and the steps the Applicant has taken in providing it, we wish to highlight that it also remains limited in scope and further work is required in order to ensure it is fit for purpose.

Natural England advises that this Appendix should be read alongside Appendix D7 Marine Processes as that highlights what is required to address potential impacts to marine processes, which can indirectly impact benthic receptors.

2. Detailed comments:

Table 1: Natural England's Advice on Benthic Ecology [REP6-029].

Document reviewed: [REP6-029] 6.2.4.2 (F) Part 4 Marine Chapter 2 Benthic Ecology (Tracked Changes)			
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	2.7.40-2.7.46	<p>Natural England welcomes the further information and quantification for impacts to subtidal chalk, peat and clay across the Offshore Scheme. However, Natural England notes that sub-cropping area of subtidal chalk and clay were recorded across the Offshore Scheme but not quantified within the Environmental Statement (ES).</p> <p>Due to the potential mobility of sediments within the Offshore Scheme, areas of subtidal chalk and clay may be periodically covered and uncovered by sediment veneers (as stated by Section 2.7.40). Natural England advises that a veneer of sediment does not exclude the possibility of exposure in the future and colonisation by biological communities.</p> <p>Therefore, it is also important to consider physical disturbance and direct loss impact pathways to areas of sub-cropping chalk and clay which are covered by a thin veneer of sediment but have the potential to be exposed in the future.</p> <p>Natural England highlights that subtidal chalk, peat and clay are marine irreplaceable habitats and will not recover if physically damaged. In addition, the UK supports internationally important quantities of subtidal chalk, a globally rare habitat.</p>	<p>Natural England advises areas of sub-cropping chalk and clay, covered by a thin veneer of sediment, which have the potential to be impacted by construction works (temporary disturbance) or placement of infrastructure (permanent habitat loss) should be considered the same as outcropping subtidal chalk and clay exposures. The extent of each habitat should be fully quantified and included within the assessment.</p> <p>Natural England advises that measures to avoid impacts or if not possible, to reduce impacts as far as possible, should apply to shallow sub-cropping chalk and clay when covered by a sediment veneer as outcropping chalk and clay.</p>
2	2.9.25	<p>Natural England questions the statement that the only surficial chalk was identified between KP101 and KP127, and the remaining was subsurface.</p>	<p>Natural England advises that clarification is provided regarding the extent and distribution of subtidal chalk across the whole of Offshore Scheme.</p>

		The referenced Geophysical and Geotechnical survey report (REP2-035) states that chalk outcropped between KP96 and KP98.	
3	2.9.9-2.9.10	<p>Natural England welcomes the change to the sensitivity of peat and clay exposures (a S41 NERC and irreplaceable habitat) to physical disturbance to 'high', as advised by Natural England previously.</p> <p>However, Natural England notes that no sensitivity information is provided for physical disturbance impacts to subtidal chalk.</p> <p>The proposed changes partly address concerns within Point 5 of the Benthic R&I Log. However, the changes have only been made for peat and clay exposures and the sensitivity rating for subtidal chalk has been deleted.</p>	Natural England advises that the document should be updated to include a 'high' sensitivity rating for subtidal chalk to physical disturbance impacts.
4	2.9.19	<p>Natural England notes the additional information provided regarding the movement of plant and vehicles cross the mudflats at Pegwell Bay, including the statement that any indentations upon the mudflat surfaces will be undetectable after a single, or at most, a few tidal cycles.</p> <p>Natural England welcomes this statement but advises that monitoring is required to validate this statement.</p> <p>In addition, there is no consideration of compaction of sediment which can impact the underlying sediment and effect the accretion of Saltmarsh in the future.</p>	Natural England advises that post-consent monitoring is secured to monitor the recovery of the intertidal mudflats morphology and biological communities following landfall construction works, to validate predictions within the ES. This issue could be considered resolved if appropriate monitoring is secured through the IPMP.
5	2.9.44	Natural England notes that the expected deposition of sediment on the seabed from construction works will be limited to less than 0.5 mm on the seabed and will therefore have negligible smothering impacts for reef habitats.	Natural England agrees with this position and considers this issue resolved.

Table 2: Natural England’s Advice on Benthic Ecology

Document reviewed: [REP6-116] 9.140 Outline In-Principle Monitoring Plan			
NE Ref	Section	Key Concern and/or Update	Natural England’s Advice to Resolve Issue
1	n/a	Natural England welcomes the provision of the proposed In Principle Monitoring Plan (IPMP). However, the IPMP contains limited information on monitoring surveys for benthic receptors, or how monitoring will address outstanding questions or validate predictions within the ES, especially in relation to temporary disturbance impacts, recovery of receptors and potential impacts upon Section 41 habitats (e.g. blue mussel beds or <i>Sabellaria spinulosa</i> biogenic reef).	Natural England advises that further information is provided within the IPMP to inform the aims, rationale and approach for post-consent monitoring. As set out by Natural England’s best practice advice (Phase IV), IPMPs should clearly set out the monitoring aims and objectives that will be tested, present the approach to monitoring to answer the monitoring aims and details for what deliverables will be produced. We refer you to overarching comments on the IPMP provided in Natural England’s Deadline 7 cover level and Appendix L7.
2	3.4.9	Natural England notes that 3.4.9 states that the requirement for post-construction benthic survey will be informed by results from pre-construction surveys and final engineering of the project.	<p>Natural England advises that the final benthic monitoring plan should be agreed with the MMO, in consultation with the relevant SNCBs.</p> <p>If habitats or species of conservation value (e.g. Section 41 habitats or qualifying annex I habitat) are identified during pre-construction surveys, Natural England advises that commitments for post-construction surveys should be secured to demonstrate either avoidance or, where avoidance is not possible, recovery of habitats.</p> <p>Natural England advises that further monitoring and/or remedial works may be required if impacts are not found to be as predicted within the ES.</p>
3	3.4.11	<p>Natural England welcomes commitments to produce a Benthic Mitigation Plan, for agreement with the MMO in consultation with the relevant SNCB, if benthic habitats of principal importance (NERC Section 41) are identified during pre-construction surveys.</p> <p>However, Natural England notes that strong commitments</p>	Natural England advises that commitments to micro-route the cable to avoid or minimise impacts upon habitats of conservation importance (e.g. Section 41 habitats) should be secured. Impacts to S41 habitats should be avoided wherever possible. Where avoidance of impacts is not possible, MMO and the relevant SNCB should be consulted (not just

		have not been secured to avoid impacts to S41 wherever possible (e.g. through micro-siting) and minimised where not possible to avoid.	informed) to ensure that impacts are minimised as far as possible.
4	n/a	Natural England notes the expected recovery of mudflats within Pegwell Bay following cable installation works, including that all depressions within mudflats will recover within a few tidal cycles, but this doesn't take account of compaction of underlying sediment.	Natural England advises that the IPMP is updated to include pre-construction and post-construction monitoring of intertidal mudflats to validate predictions for the recovery of mudflat morphology and infaunal communities within the ES and to inform if further monitoring or remedial works are required.

Table 3: Natural England's Advice on Benthic Ecology

Document reviewed: [REP6-017] 6.11 (E) Marine Conservation Zone Assessment (Tracked Changes)			
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
	1.5.22 1.5.26 1.5.31	Natural England advises that insufficient evidence has been provided to support 'negligible' indirect impact conclusions for Goodwin Sands MCZ.	Natural England draws the ExA attention to advice provided in Appendix D7 to our Deadline 7 submission where change to marine process and implication to benthic features with the MCZ is discussed in more detail. However, we highlight that based on the conclusions in the updated MCZA we believe that indirect concerns to features of the MCZ could be resolved through a commitment to not place cable protection along the section of the route running parallel to the MCZ (except for at cable crossings).

Table 4: Natural England's Advice on Benthic Ecology

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
	4.4.17	Natural England notes that contamination risk from degrading of the hoverport is considered here. But there is no consideration of structural integrity issues.	Natural England advises that impacts from debris, contaminants and containment require further consideration before the full scale of the impacts from the use of the hoverport can be fully understood.
	4.4.22	Natural England concerns with the scope of W37 provided at Deadline 6 remain.	Please see advice in Appendix D6 and E6 of our deadline 6 submission.

4.4.23	Natural England advises that it remains unclear how matting will be sufficient alone to ensure hoverport integrity, even if load weight is spread. It is also likely to cause vegetation die off which is likely to further impact the integrity of the hoverport.	Natural England advises that further consideration is given to options to maintain the integrity of the hoverport.
7.3.70	Natural England advises that visible rutting and compaction of subsurface sediment layers are two separate impacts, with compaction being of more concern. Evidence from cable installation in The Wash and at Hornsea 1 and 2 landfalls has demonstrated where there has been sediment compaction even with the use of low ground pressure excavators has resulted limited recovery of habitats and succession towards saltmarsh.	Natural England advises that strong commitments to only use low ground pressure vehicles (less than a human footprint), limit the number of return trips per vehicle, use of aluminium trackway to spread the load and reduce the speed of vehicles are required to resolve this issue. Ideally, we would also advise that works are undertaken in drier conditions when compression of the sediment will be less, but with regular tidal inundation this may not be possible.
7.3.72 and 7.3.73	There is no evidence presented that this area of intertidal habitat is comparatively more or less important as supporting SPA habitat. And that surround areas will provide the same resource.	Natural England advises that impacts to supporting habitats of the Thanet SPA and Ramsar remain unresolved. But the risk and potential mitigation measures could be addressed through a commitment pre-construction on bird hotpot areas within the SPA.
7.3.72	Natural England advises that the NEMO evidence used to support conclusions should be submitted into examination for further consideration and agreement on potential mitigation measures	N/A

Table 5: Natural England's Advice on Benthic Ecology

Document reviewed: [REP6-073] 7.5.2 (D) Outline Offshore Construction Environmental Management Plan (Tracked Changes)			
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
	Table 1.6	Natural England is concerned with the proposed monitoring of the hoverport because if an issue is found a stop work requirement is needed. Any options to continue its use are likely to be damaging in their own right and should be subject to further review and approval.	Natural England advises that further consideration of the ongoing use of the hoverport is required and that consideration should be given to overall enhancement of the designated site feature as part of the project to make it overall environmentally net positive.

	Table 1.6	Natural England continues to advise as per Deadline 6 in relation to changes in HDD depth.	Please see Appendix E6 [REP6-245].
	1.11	Natural England highlights that commitment to providing plans does not commit the Applicant to implement mitigation.	Natural England advises that the REAC commitments are strengthened to include undertaken of mitigation, monitoring of success and delivery of remediation if impacts are not as predicted in the ES
	GG45	NEW ISSUE: this is the first reference to the use of a hovercraft in examination and no details on extent, duration and timings of use have been consider. Therefore, until further information is provided, we are unable to advise on the scale and significance of the intertidal benthic impacts from its use	Natural England advises that further information is required before we can advise further on the potential risks from the use of the hovercraft

Table 6: Natural England's Advice on Benthic Ecology

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
	MPE09	Natural England queries who is going to review and agree the monitoring and contingency. The trigger point at which monitoring and contingency would be implemented is unclear in the plan.	Natural England advises that the commitment is strengthened to include necessary detail that the monitoring and mitigation will be delivered.
	B59	Ongoing issue with changes to HDD depth as raised at Deadline 6.	Please see E6 to our deadline 6 submission.
	GG45	NEW ISSUE: this is the first reference to the use of a hovercraft in examination and not details on extent, duration and timings of use have been consider. Therefore, until further information is provided, we are unable to advise on the scale and significance of the intertidal benthic impacts from its use	Natural England advises that further information is required before we can advise further on the potential risks from the use of the hovercraft.
	BE06	It is unclear in the absence of this commitment how NERC 41 mitigation will be implemented.	Natural England would welcome clarity from Applicant as to how NERC Annex I habitat mitigation is secured.

Table 7: Natural England’s Advice on Benthic Ecology

Document reviewed: [REP6-137] 9.92 (C) Outline Cable Specification and Installation Plan (Tracked Changes)			
NE Ref	Section	Key Concern and/or Update	Natural England’s Advice to Resolve Issue
	2.1.3	Natural England notes that a commitment to ‘prior to construction’ is missing here in relation to the provision of final landfall plans.	Please could confirmation be provided as to where preconstruction is secured.
	3.3	Natural England notes that only geophysical data is proposed to determine extent of NERC habitats, which we do not believe will be sufficient.	Natural England advises that Drop Down Video monitoring will also be required to map NERC habitats.
	3.4.3	Natural England welcomes boulder clearance commitments and now considers this issue resolved.	See Point 13 Tab E of our Risks and Issues Log.
	7	Natural England notes that only post installation monitoring is proposed without further management measures if impacts are found to be greater than predicted.	Natural England advises that the commitment is strengthened to include necessary detail that the monitoring and mitigation will be delivered.