

Date: 18 September 2026
Our ref: 557672
Your ref: EN020026



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BY EMAIL ONLY

Dear Sir/Madam,

Planning Act 2008 and The Infrastructure Planning (Examination Procedure) Rules 2010

Application by National Grid Electricity Transmission plc (“the Applicant”) for an Order granting Development Consent for the proposed Sea Link Interconnector project (“the Proposed Development”)

The following constitutes Natural England’s formal statutory response to the Secretary of State’s Request for Information (RFI) dated 18th of September 2026. To inform this response Natural England have reviewed the following documents:

- [REP7-088] 6.11 (F) Marine Conservation Zone Assessment (Tracked).pdf
- [REP7-090] 6.2.1.4 (E) Part 1 Introduction Chapter 4 Description of the Proposed Project (Tracked).pdf
- [REP7-094] 6.2.2.2 (F) Part 2 Suffolk Chapter 2 Ecology and Biodiversity (Tracked).pdf
- [REP7-095] 6.2.3.2 (H) Part 3 Kent Chapter 2 Ecology and Biodiversity (Clean).pdf
- [REP7-098] 6.2.4.1 (H) Part 4 Marine Chapter 1 Physical Environment (Tracked).pdf
- [REP7-100] 6.2.4.2 (G) Part 4 Marine Chapter 2 Benthic Ecology (Tracked).pdf
- [REP7-120] 6.6 (I) Habitats Regulations Assessment Report (Tracked).pdf
- [REP7-128] 7.5.2 (E) Outline Offshore Construction Environmental Management Plan (Tracked).pdf
- [REP7-141] 7.5.7.2 (E) Outline Landscape and Ecological Management Plan- Kent (Clean).pdf
- [REP7-142] 7.8 (D) Red Throated Diver Protocol (Clean).pdf
- [REP7-148] 9.13(E) 9.13 (E) Pegwell Bay Construction Method Technical Note (Tracked).pdf
- [REP7-151] 9.30 (B) Agricultural Land Classification (ALC) Survey Results – Suffolk (Tracked).pdf
- [REP7-153] 9.31 (C) Agricultural Land Classification (ALC) Survey Results – Kent (Tracked).pdf
- [REP7-158] 9.84 (E) Register of Environmental actions and Commitments (REAC) (Tracked Changes).pdf
- [REP7-160] 9.92 (D) Outline Cable Specification and Installation Plan (Tracked).pdf
- [REP7-168] 9.140 (B) Outline In-Principle Monitoring Plan (Tracked).pdf
- [REP7-258] 9.149.1 Applicant's Comments on Natural England Risk Issues Log_Deadline 6.xlsx
- [REP7-359]

- [REP7-360] Late submission accepted at the discretion of the Examination Authority - 9.84 (F) Register of Environmental Actions and Commitments (REAC) (Tracked)

Natural England has reviewed the above documents only insofar as necessary to respond to the questions contained within the Request for Further Information (RFI) from DESNZ.

Should DESNZ require a full review of these documents, together with any other relevant updated documents submitted by the Applicant at Deadline 7, Natural England would be able to undertake that review to in order to determine if our risks and issues have been addressed by the Applicant, if requested by DESNZ and instructed by the Secretary of State, and provide its response by the next RFI deadline.

Natural England has been invited to comment upon:

Benthic Ecology

3. The Applicant, MMO and NE are invited to comment on proposed condition of Schedule 16 (Deemed Marine Licence):

Benthic Mitigation Plans

“Based on pre-construction surveys required in conditions 4(1)(I) and 15 and in agreement with MMO, the Undertaker must prepare a Benthic Mitigation Plan(s). Any necessary Benthic Mitigation Plans must be submitted to and approved in writing by the MMO in consultation with the statutory nature conservation body prior to offshore works commencing and should include a timetable for implementation of the mitigation and details of any necessary monitoring. Any agreed mitigation and/or monitoring must be implemented in accordance with the agreed timetable.”

Natural England's Response:

Natural England confirms agreement with the proposed condition wording to secure provision of the benthic mitigation plan. Whilst, we are content with the commitment to discuss and agree the further detail of the benthic mitigation plan at the pre-construction phase and recognised its inclusion in the CEMP; we request that in alignment with all other marine licence conditions that the condition is amended to ensure that the proposed Benthic Mitigation Plan is provided a minimum of 6 months prior to commencement of seabed preparation works and is informed by agreed pre-construction baseline monitoring survey.

For clarity, we also advice the reference to the "...timetable for implementation of mitigation and details of any necessary monitoring..." is updated to reflect the intension to monitoring the effectiveness of the mitigation measures. Monitoring requirements are addressed separately through other conditions, recognising that monitoring itself does not constitute mitigation.

4. NE is invited to confirm whether [REP7-258] provides sufficient information as to the nature of the impacts to intertidal benthic features of Sandwich Bay and Hacklinge Marshes SSSI. Noting Deadline 7 updates such as [REP7-099] and [REP7-258], NE is invited to confirm whether it considers this and any other outstanding issues in [REP7-364] to be resolved.

Natural England's Response:

Having reviewed the updated Benthic and Intertidal Ecology Chapter [REP7-099] and the Applicant's Comments on Natural England's Deadline 6 Risks and Issues Log [REP7-258], in order to determine whether our outstanding risks and issues to notified features of Sandwich Bay and Hacklinge Marshes SSSI have been addressed, Natural England has updated the benthic ecology tab only within our Deadline 7 Risks and Issues Log [REP7-364], as requested. Please see our

updated version of the Deadline 7 Risk and Issues Log Deadline version 2 for the outstanding benthic issues.

Following this review, Natural England confirms that outstanding concerns remain from a benthic ecology perspective. In addition, separate concerns remain in relation to the proposed landfall at Pegwell Bay. All potential impact pathways associated with the Pegwell Bay landfall and intertidal ecology, identified from across multiple thematic documents, are included within Tab B and J of our Deadline 7 Risks and Issues Log [REP7-364].

Hovercraft

6. NE [REP7-274] raised concerns regarding effects on marine mammals, noise and visual disturbance due to the late addition of commitment in GG45 in the Register of Environmental Actions and Commitments ("REAC") which stated that the hovercraft at Pegwell Bay would be on standby and only used for emergencies. The Secretary of State invites the Applicant to update GG45 in the REAC [REP7-359], outline Construction Environmental Management Plan ("oCEMP") [REP7-129] and oCEMP [REP7-127] to strengthen this commitment as follows:

"Hovercraft at Pegwell Bay will be on standby and used for emergencies only. It will not be used at any other time during any stage of the project's construction, operation, maintenance or decommissioning. The applicant will report all instances of emergency hovercraft use to Natural England and Thanet District Council TDC within 24 hours".

The Applicant is also requested to define 'emergency use.'

Natural England's Response:

Natural England welcomes the requirement limiting the use of the hovercraft to emergency situations. Notwithstanding this, in recognition of the overlapping regulatory remits, Natural England advises that the definition of an "emergency" should be agreed with the MMO, the Local Planning Authority and the relevant SNCB prior to the first deployment of the hovercraft. Furthermore, a hovercraft code of conduct should be prepared and agreed with *all* relevant interested parties before first use, to minimise adverse environmental effects as far as reasonably practicable. Please see advice provided on following point.

7. NE is invited to advise whether this control is sufficient to avoid adverse effects on marine mammals and designated sites from the use of hovercraft.

Natural England's Response:

Following a previous meeting with the Applicant in July to discuss outstanding issues we provided the below advice to the Applicant on 31 July.

'We acknowledge that the use of the hovercraft is only in the event of an emergency (i.e. rescuing someone) and therefore that it can be hard to estimate/predict to quantify impacts. However, as advised in the meeting we would normally expect the project to quantify and assess a WCS (in line with our advice provided at D.7) and would require further info on timings, extent and duration of works as well as the phase of work that it would be considered for, in order to assess the disturbance impact to the designated features of the site (namely birds and seals). We would also want an agreed/secure access location, and a map showing the route that would be taken in the event of emergencies.'

In addition, there would need to be mitigation in relation to:

- not over revving engine/s;*
- the speed of travel;*
- avoidance of seals both in the water and at haul out locations;*
- and a direct a route as possible proposed (i.e. no zig-zagging).*

We suggested a protocol used for RNLI training in the Wash that could be adopted for the mitigation that we can forward if helpful.

In summary, Natural England would still expect the Applicant to assess the WCS as best they can in line with the above concerns to ensure confidence that impacts on birds and seals would be avoided and mitigated where practicable, from the potential use of a hover craft in the event of an emergency. With all relevant information on the use of the hovercraft (including embedded mitigation measures) secured within a Code of Conduct to be agreed with all relevant parties prior to the hovercrafts first use.

Natural England wishes to comment on the definition of 'emergency.' Following a call with the Applicant (09/09/26) where they explained that they will be using the definition of 'emergency' from the DCO, we can confirm that whilst we are content with the proposed definition in general terms, we advise that this needs further refinement in relation to the proposed use of a hovercraft.

Agriculture and Soils

12. The Secretary of State notes that NE was unable to review the detailed agricultural land classification ("ALC") survey data due to its late submission in the examination period. NE is invited to provide comments on the ALC survey data.

Natural England's Response:

Natural England welcomes the completion of the detailed Agricultural Land Classification (ALC) surveys for the Suffolk and Kent Onshore Schemes. The surveys represent a substantial improvement on the predictive information available at the time of the Preliminary Environmental Report (PEIR) and respond in part to our previous advice.

However, the reports do not yet fully resolve our concerns. In Suffolk, a material area remains reliant on predictive modelling, including a majority of the reported Grade 2 land. The comparison between the predictive and updated datasets is also affected by changes to the Order Limits and should be repeated on a like-for-like spatial basis. However, in Kent, the survey coverage is substantially more complete, but further justification is required for the assignment of Grade 3b solely by reference to Flood Zone 3.

Natural England also advises that the ALC and soil information should be expressly linked to the latest Soil Management Plan. The secured plan should show how mapped soil types and ALC grades will inform avoidance, stripping, storage, reinstatement, target restoration profiles, specialist supervision, monitoring and aftercare. The objective should be to return temporarily disturbed best and most versatile (BMV) land to its pre-construction agricultural quality, as far as practicable, and all other soils to a condition suitable for the intended after-use.

- i. Provide field-surveyed and predictive areas separately, rather than presenting the combined output as wholly detailed survey information.
- ii. For Suffolk, provide a like-for-like spatial comparison using the same Order Limits for both datasets.
- iii. For Suffolk, explain the implications of 38.5 ha of Grade 2 remaining predictively classified, including whether further survey is possible before construction.
- iv. For Kent, justify the flood-risk grading using evidence relevant to the ALC flooding criteria rather than Flood Zone 3 designation alone.
- v. Confirm that all land subject to disturbance has been surveyed, and secure pre-construction survey requirements for any currently scoped-out area that later becomes subject to disturbance.
- vi. Provide a breakdown of temporary and permanent land take by component and ALC grade,

- with totals that can be independently reconciled.
- vii. Demonstrate avoidance and micro-siting, particularly in relation to the newly identified Grade 1 land in Kent.
- viii. Cross-reference the ALC information to the Soil Management Plan, including maps of soil-handling units and restoration specifications.
- ix. Secure competent soil-specialist supervision, monitoring and reporting, together with measurable restoration and aftercare criteria.
- x. Clarify the basis for the decommissioning assessment, including whether reinstatement represents reversal of an adverse effect rather than a net beneficial effect.

Ecology, Biodiversity and Ornithology

16. The Applicant is invited to provide an updated oCEMP and REAC which amends references in commitment B45 to the breeding season from 'March to August' to 'March to September' and to require supervision by an ecological clerk of works and/ or qualified ornithologist during all months. NE is invited to advise whether it considers this commitment would avoid temporary adverse effects on Sandwich Bay and Hacklinge Marsh SSSI breeding bird assemblage from disturbance during construction.

Natural England's Response:

Subject to the breeding bird season being amended from March to September inclusive and the requirement for works to be supervised by an ecological clerk of works (ECOW) and/or qualified ornithologist, Natural England is satisfied that temporary adverse impacts to the breeding birds associated with the Sandwich Bay to Hacklinge Marshes SSSI from disturbance during construction are unlikely to occur landwards of the sea defence. However, please see our outstanding concerns in relation to the use of a hovercraft and landfall activities as set out in Tab B of our Deadline 7 risks and issues log [REP7-364].

21. The Applicant is invited to set out how the dormice survey methodology [APP-108, APP-228, APP-159, APP-259] is in line with the Dormouse Conservation Handbook (second addition). NE is invited to comment on the Applicants survey methodology.

Natural England's Response:

Natural England's Wildlife Licensing Service (NEWLS) has had limited time to review the relevant information in relating to the dormice survey approach with respect to the Sea Link scheme. However, we have reviewed the salient information to address the SoS' questions as requested. Please see our responses as below.

The Applicant references the Dormouse Conservation Handbook (second edition), the current version at the time surveys were undertaken. There have since been two updated documents published (Hazel Dormouse Mitigation Handbook 2025, and Hazel Dormouse Conservation Handbook – Third edition 2025) which include some deviations from the survey recommendations of the Dormouse Conservation Handbook (second edition). The main differences in the updated documents comprise the separation of survey recommendations depending on habitat quality. For good habitat, surveys should include a minimum of 50 nest tubes checked on a monthly basis (Table 3.2 of the Hazel Dormouse Mitigation Handbook 2025 sets out the recommended number of visits), and 100 tubes for poor or fair quality habitat, checked on a monthly basis for the full season. Natural England advises that even though the habitat quality across the scheme is unclear; the absence of monthly checks means it is unlikely that the scheme would reach the required survey effort as stipulated under the current dormouse Handbooks. Therefore, we are unable to agree that the Applicant's survey meets standard best practice guidance. Therefore, the scale and significance of impacts, and sufficiency of any proposed mitigation is in doubt.

Suffolk

The score provided for the Zone D survey area is provided by the applicant as 20.1, higher than the threshold of 20 which allows assumed absence to be concluded. However, the Handbook (second edition) recommends that at least 50 tubes are used per survey and highlights the risk of missing dormouse presence when small numbers of tubes are used. The applicant's Table A.2 Zone D Survey Score Calculation demonstrates that small numbers of tubes were used during parts of the survey season (e.g. 21 tubes in November 2023, 15 tubes in October 2024). If the scores from these sections were removed, the overall score for Zone D would fall below the threshold at which likely absence can be reasonably concluded.

Access to Zone E4 was not possible in 2024. Without this, the survey effort threshold of 20 is still exceeded. However, without surveying in E4, there is a relatively large section of the scheme (between E3 and F1) comprising suitable habitat that has not been surveyed thoroughly.

Nest tubes in Zone F were only installed in late October 2023; therefore, a score should not be recorded until November 2023. However, as tubes in Zone F2 were destroyed in 2023, only a small number of tubes in F1 were used between November and May 2024. As referenced above, there is a risk when using a small number of nest tubes that dormice are missed. Due to the small number of nest tubes installed prior to May 2024, it is Natural England's opinion that the first scoring month should be May 2024.

Natural England notes the dormouse record within 330m of the scheme. In combination with the possible dormouse nest recorded in D3, and the queries regarding survey effort that we have raised above, it is Natural England's opinion that the applicant should re-assess the likelihood that dormice could be present within the Scheme boundary and undertake further surveys if required.

Kent

The score provided for Zone D of the survey area is 14.96, below the threshold at which likely absence can be concluded. Therefore, these surveys cannot reliably be used to support a conclusion of likely absence.

The score for Zone B does exceed the 20 threshold; however, it is not clear from the figures how well connected the habitat between the subsections of Zone B is. The Handbook (second edition) recommends that at least 50 tubes are used per survey and highlights the risk of missing dormouse presence when small numbers of tubes are used. Surveys in Zone B3 used only 5 nest tubes, and B4 used 10. Without further detail from the applicant on the connectivity between these subsections, and the justification for the numbers of nest tubes used, it is difficult to determine the acceptability of Zone B survey methodology.

22. With regards to paragraph 1.4.1, Table 1.15, Table 1.18, paragraph 1.5.5, and 1.5.7 of [APP-108] and paragraph 2.7.31 of [REP7-094] the Applicant is invited to further justify how they have concluded likely absence of Hazel Dormice for the Suffolk Onshore Scheme paragraph 2.9.89 [REP7-094]. With regards to paragraph 1.4.8, Table 1.9, Table 1.11, Table 1.12, paragraph 1.4.12, Table 1.14, Table 1.15, and paragraph 1.5.5 of [APP-159] the Applicant is invited to justify its conclusion within the oLEMP [REP7-141] paragraph 3.5.5 and [REP7-095] paragraph 2.9.105, of likely absence of Hazel Dormice for the Kent Onshore Scheme. NE is invited to comment on the Applicants survey conclusion.

Natural England's Response:

Natural England notes that there have been past dormouse records close to the scheme footprint, resulting in the issuing of a dormouse mitigation licence in 2017 (Magic Map (MAGIC)) west of the A256, confirming dormouse presence in this area. There appears to have been potential dormouse nests discovered as part of the Scheme survey effort, which were subsequently discounted from further survey effort. We are of the view that residual risk around the presence of dormice remains which the applicant has not sufficiently addressed. Natural England, therefore, agrees with the Applicant's comments in Section 1.5.6 of APP-159 that further survey effort is needed, and indeed,

we would encourage such further survey prior to construction, and should those surveys identify presence of dormice a dormouse mitigation licence is likely to be required.

26.NE identified unexploded ordnance as a red risk in its issues log but did not have an opportunity to comment on the measures referenced in the final REAC [REP7-359]. The Secretary of State invites NE to provide an updated position on the final mitigation proposals.

Natural England's Response:

Suffolk Onshore:

Natural England welcomes the inclusion of GG39 within the oCEMP and considers that with the amendments below, it is appropriate to mitigate the impacts to Leiston – Aldeburgh SSSI and Sandlings SPA.

"The Applicant will implement the mitigation measures in accordance with the recommendations set out within the detailed UXO risk assessment reports appended to the Onshore oCEMP. Where the Applicant has influence over the controlled explosion of terrestrial UXO, ~~they will consult Natural England and RSPB in advance to take measures and protect Sites of Specific Scientific Interest where practicable,~~ they will work with Natural England and the RSPB in advance to agree a methodology and timing to ensure that impacts to the SSSI are avoided or minimised."

Kent Onshore:

Natural England welcomes the inclusion of GG39 within the oCEMP and considers that with the amendments below, it is appropriate to mitigate the impacts to the Sandwich Bay to Hacklinge Marshes SSSI.

"The Applicant will implement the mitigation measures in accordance with the recommendations set out within the detailed UXO risk assessment reports appended to the Onshore oCEMP. Where the Applicant has influence over the controlled explosion of terrestrial UXO, ~~they will consult Natural England and RSPB in advance to take measures and protect Sites of Specific Scientific Interest where practicable,~~ they will work with Natural England and the RSPB in advance to agree a methodology and timing to ensure that impacts to the SSSI are avoided or minimised."

However, please note that this does not address concerns in relation to impacts on supporting intertidal habitats. We advise that where detonation in situ within the intertidal occurs there is likely to be a requirement for actions to resource habitats.

Habitats Regulations Assessment

34. The Applicant is requested to update the outline Red-Throated Diver Protocol [REP7-142] to remove the commitment to discuss compensation requirements post-emergency repair with the MMO as this mechanism does not appear consistent with derogation requirements under the Habitats Regulations.

Natural England's Response:

Whilst Natural England acknowledges that the likelihood of an emergency cable repair being required is low, there remains a potential impact pathway associated with such works that should be considered through the consenting process unless it is addressed under a separate marine licence.

Natural England advises that should the above proposed sentence be removed an agreed Method Statement (or similar) needs to be agreed with Natural England and MMO before emergency works can commence within the sensitive winter period

35.NE is invited to confirm that the revised Marine Chapter 1, Physical Environment [REP7-097] and Marine Chapter 2, Benthic Ecology [REP7-099] address its concerns [REP6-244] that some landfall construction activities were not included, and that clarification was needed about sequential or overlapping cable installation activities.

Natural England's Response:

Natural England welcomes the updates made to [REP7-098] the Physical Environment and [REP7-100] the Benthic Ecology Chapters. These have partially addressed our concerns as detailed below:

We note that the widths and locations of access routes at the Kent landfall (between Hoverport and HDD working area) have not been provided. The Applicant states [REP7-128] that these details will be defined post consent in consultation with Natural England.

We also note [REP7-147] that no further details (e.g. impact footprint) have been provided on advance works (e.g. archaeological trial trenching) that may take place ahead of the main construction period at Pegwell Bay.

We welcome the clarification on the phasing of cable installation activities at the Kent landfall, and the Maximum Design Scenario (MDS) for seabed disturbance for marine cable pull in (including cable roller placement on the mudflats) and subsequent marine cable burial. The estimated area of disturbance for two cable trenches at the Kent landfall (encompassing marine cable pull-in and subsequent marine cable burial) is significant (50,000m²). However, these latest updates do not alter the WCS total seabed disturbance area at the Kent landfall due to construction (i.e. 72,100m²). Therefore, the assessment conclusions also remain unchanged.

We highlight (and as stated in [REP7-147]) that these maximum design parameters are based on the use of Horizontal Directional Drilling (HDD) and have, in turn, been used to inform the maximum design scenarios that form the basis of the receptor specific impact assessments. Therefore, if HDD proves not to be feasible then we advise it may be necessary to revisit the impact assessments.

Furthermore, we reiterate the importance of monitoring to validate ES predictions regarding seabed impacts and to demonstrate seabed recovery at landfall (as advised previously in NE Appendices D7 [REP7-272] and E7 [REP7-273]).

If you have any queries relating to the advice in this letter, please consult Natural England at consultations@naturalengland.org.uk referencing 557672.

Yours faithfully,

Sustainable Development, East Midlands Area Team