



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Sea Link Energy Cable

**Appendix C8 for Natural England's combined response to the Deadline 7 documents
and to the All Interested Parties – Invitation to comment
Natural England's Advice on the DCO**

For:

The construction and operation of Sea Link Energy Cable

Planning Inspectorate Reference EN020026

21 October 2026

Appendix C8 for Natural England's combined response to the Deadline 7 documents and to the All Interested Parties – Invitation to comment DCO

In formulating these comments, the following documents have been considered.

Sea Link Deadline 7 Submission Documents

- [REP7-003] 3.1(J) draft Development Consent Order (Tracked changes)
- [REP7-086] 9.7 (H) Applicant's Schedule of Changes to the Development Consent Order (Tracked changes)

Sea Link All Interested Parties – Invitation to comment

- EN020026-003930-C1-214 - 9.7 (I) (Post-Examination) Applicant's Schedule of Changes to the Draft Development Consent Order Tracked Changes
- EN020026-003897-C1-181 - 3.1(K) (Post-Examination) draft Development Consent Order (Tracked Changes)

Please note that we have been unable to review the updated DCO/dML uploaded onto the PINs website on Monday 19th October 2026 [C3-003, C3-004, C3-012, C3-013]

Summary:

Natural England welcomes the updated documents at Deadline 7 of the Examination (27 Apr 2026) and the documents submitted for the Request for Further Information (18 Sept 2026). We also welcome the updates to include the reference to the “relevant Statutory Nature Conservation Body (SNCB)” and the update to fully include the 2km buffer for Red Throated Divers in the wording for Condition 11.

However, we still have outstanding concerns regarding the wording to secure post - construction benthic monitoring, the definition of ‘Trenchless Techniques’ and some remaining uncertainty in the DCO wording listed below in Table 1. Please see the detailed comments below in Table 1 and our updated Risks and Issues Log (tab C) for further information.

Minor comments:

[REP7-086] 9.7 (H) Applicant's Schedule of Changes to the Draft Development Consent (Tracked Changes)

Several cells appeared blank within the document. Consequently, we advise that a review of the relevant changes required needs to be cross referenced to the corresponding DCO.

EN020026-003930-C1-214 - 9.7 (I) (Post-Examination) Applicant's Schedule of Changes to the Draft Development Consent Order Tracked Changes

Natural England highlights that a clear schedule or table summarising changes to the latest DCO version was not readily apparent. As a result, the licence was reviewed in full and cross-referenced against the DCO documentation to identify the relevant amendments.

Detailed comments:

Table 1: Natural England's Advice on the Development Consent Order (DCO)

Document reviewed: [REP7-086] 9.7 (H) Applicant's Schedule of Changes to the Development Consent Order (Tracked changes)			
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	Table 3.7 Point 3	Natural England notes that the Applicant has included a definition of Statutory Nature Conservation Body (SNCB). Changes have been made throughout the DCO to amend reference to Natural England (NE) to the SNCB.	Resolved. Natural England is now appropriately included as relevant SNCB.
2	Table 3.7 Point 28	The Applicant has added a condition which prohibits maintenance of cable via an open cut technique, unless otherwise approved by the relevant planning authority in consultation with NE. This condition is repeated within the dML.	Natural England continues to advise that the use of open cut techniques for cable repair/replacement at either landfall should be subject to a separate marine licence as they are not assessed as part of the current EIA.
3	Table 3.7 Point 34	The Applicant has included new requirement 22 which details limitations to access in Pegwell bay.	Resolved.
4	Table 3.7 Point 50	The Applicant has added a definition of Trial Trenching. However, this wording does not resolve the issue as it would still potentially allow trial trenching within sensitive sites prior to the agreement of monitoring or mitigation plans.	No Change. The Applicant's wording does not resolve the issue as the provision of an interpretation of Trial Trenching confirms Trenching may happen within order limits that includes the sensitive intertidal areas, prior to agreement of monitoring or mitigation plans.
5	Table 3.7 Point 51	The Applicant has added a definition of emergency cable repair works.	Natural England is content for the definition to be applied to for the used of the hovercraft within Pegwell Bay as included in REAC GG45. However, we continue to have concerns in relation to emergency works within the Outer Thames SPA. Therefore, this definition cannot apply to impacts associated with those works currently.

6	Table 3.7 Point 56-58	The changes here are not shown, just a blank square. Checking the dML itself the changes are: • Inclusion of wording saying they will micro site where necessary. • Updated wording to require a methodology and mitigation plan for Pegwell Bay • Updated red-throated diver (RTD) protocol condition. • Removed requirement for In Principle monitoring Plan but added to the monitoring conditions later.	Natural England's advice on these changes is as follows: • The micro-siting requirement is vague and does not say what they will micro-site around. Standard wording would have noted micro-siting around benthic features of ecological or conservation importance. • The updated wording on Pegwell Bay methodology and mitigation is appreciated and helps make it clear a mitigation plan will be required. • The RTD protocol condition seems appropriately worded and was previously existing. • The In Principal Monitoring Plan removal is dealt with in discussion of the updated pre-construction monitoring (see point 8 below).
7	Table 3.7 Point 61	The Applicant has updated condition 11 RTD mitigation. This now includes a 2km buffer and that the plan will apply to routine monitoring and maintenance. We believe this resolves some issues.	Resolved. The condition now includes the 2km buffer and that this applies to monitoring and maintenance.
8	Table 3.7 Point 63	The cell is blank, but we believe this is the inclusion of a pre-construction monitoring condition. Natural England supports the proposed wording and considers that it ensures pre-construction benthic monitoring and action should the monitoring highlight issues.	Partially resolved. Pre-construction monitoring has been appropriately secured. However, no post construction monitoring has been secured in the DCO. We would welcome this being updated to align with REAC BE08. Further wording is required in order to ensure the commitment to post construction monitoring is secured.