



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Sea Link Energy Cable

**Appendix D8 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 Marine Physical Environment

For:

The construction and operation of Sea Link Energy Cable

Planning Inspectorate Reference EN020026

21 October 2026

Appendix D8 Sea Link Deadline 7 documents and to the All Interested Parties – Invitation to comment

Marine Physical Environment

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

Sea Link Deadline 7 Submission Documents

- [REP7- 088] 6.11 (F) Marine Conservation Zone Assessment (Tracked)
- [REP7-098] 6.2.4.1 (H) Marine Chapter 1 Physical Environment (Tracked)
- [REP7-120] 6.6 (I) Habitats Regulations Assessment Report (Tracked).pdf
- [REP7-128] 7.5.2 (E) Outline Offshore Construction Environmental Management Plan (Tracked)
- [REP7-146] 9.13 (E) Pegwell Bay Construction Method Technical Note (Tracked)
- [REP7-155] 9.74 (B) Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note (Tracked)
- [REP7-160] 9.92 (D) Outline Cable Specification and Installation Plan (Tracked)
- [REP7-164] 9.104 (C) Areas of Safeguarded Water Depth Plan (Tracked)
- [REP7-166] 9.109 Applicant's Response to Remaining Hearing Action Points
- [REP7-168] 9.140 (B) Outline In-Principle Monitoring Plan (Tracked)
- [REP7-192] 9.145 Closing Submission
- [REP7-258] 9.149.1 Applicant's Comments on Natural England Risk&Issues Log_Deadline 6.xlsx
- [REP7-259] 9.150 Applicant's Comments on Responses to Third Written Questions
- [REP7-360] Late submission accepted at the discretion of the Examination Authority - 9.84 (F) Register of Environmental Actions and Commitments (REAC) (Tracked)

Sea Link All Interested Parties – Invitation to comment documents

- EN020026-003932-C1-216 9.84 (G) Register of Environmental Actions and Commitments (REAC) (Tracked)
- EN020026-003924-C1-208 9.157 Suffolk Landfall Trenchless Installation Depth Assessment Technical Note
- EN020026-003911-C1-195 7.5.2 (F) Outline Offshore Construction Environmental Management Plan (Tracked Changes).

1. Summary

Natural England welcomes the updated documents at Deadline 7 of the Examination (27 Apr 2026) and the documents submitted for the Request for Information (18 Sept 2026). However, our position in terms of the Physical Environment has not changed from our previous position. Please see the detailed comments below and our updated Risks and Issues Log (tab D) for further information.

2. Detailed comments

Table 1: Natural England's Advice on Physical Processes

Document reviewed: [REP7-088] 6.11 (F) Marine Conservation Zone Assessment (Tracked)			
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	1.5.23 & 1.5.43-44	Natural England understands that the Applicant does not anticipate the need for external cable protection adjacent to the Goodwin Sands Marine Conservation Zone (MCZ). This is on the basis of confidence in achieving the required depth of lowering (DoL). This is welcomed. However, no commitment has been made to not allow placement of external cable protection adjacent to the MCZ. Consequently, the Applicant has included a commitment (MPE13) to place up to 500m rock protection adjacent to the MCZ, at a minimum separation distance of 100m from the MCZ boundary. The rationale for this requirement, however, is not clear. We note and welcome the additional calculations carried out by the Applicant to assess impacts on the MCZ due to the presence of rock protection adjacent to the MCZ. However: there is no assessment of potential changes to the hydrodynamic regime or sediment transport pathways which could drive morphological change in the MCZ.	Natural England continues to advise that: - based on the Applicant's confidence of achieving required cable burial depth, a commitment should be made to not allow placement of external cable protection adjacent to Goodwin Sands MCZ. - WCS external cable protection requirement adjacent to the MCZ needs to be clarified. - Supporting evidence should be provided to demonstrate feasibility of achieving the 100m separation distance in commitment MPE13. Further evidence is needed to support conclusions that there will be no observable effects on the MCZ due to the presence of cable protection adjacent to the MCZ (including consideration of potential changes to hydrodynamic and sediment transport processes).

		This is based on a worst-case scenario (WCS) of 50% of the 3.2 km cable route requiring protection (i.e. 1.6 km), which appears to contradict the 500m stated in Commitment MPE13.	
2	1.5.23	Natural England notes that it is stated that "<i>Where remedial rock protection is required this will either be within in the cable trench (not protruding above the seafloor) or a low berm (shallow slope (1:3) and maximum height</i>". It is unclear whether this applies to external cable protection that may be placed adjacent to the MCZ.	Natural England continues to seek clarification on whether the rock protection placed adjacent to the MCZ (referred to in MPE13) would be installed within the cable trench (i.e. not protruding above the seafloor) or a low berm protruding above the seabed (with maximum height of 1m and shallow slope).

Table 2: Natural England's Advice on Physical Processes

Document reviewed: [REP7-098] 6.2.4.1 (H) Environmental Statement Part 4 Marine Chapter 1 Physical Environment (Tracked)			
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	1.7.4-6 & 1.7.43-6 & 1.9.108-116 & MPE08	Natural England notes that the Applicant has provided an updated assessment of shoreline evolution at the Suffolk landfall and conservative minimum depth of cable burial, which we understand is based on a number of assumptions/limitations. These assumptions (including future shoreline management policy being maintained, not including the most recent beach profile data, and a lack of consideration of more extreme storm events), coupled with a landward shifting landfall frontage that is potentially bound to the north by a retreating/adapting shoreline and to the south by an increasingly prominent fixed frontage raises concerns regarding the long-term sufficiency of the estimates of cable burial depth and possibly landward setback distance.	Natural England notes that commitment MPE08 includes provision for further analysis to be undertaken to consider the potential for coastal erosion over the lifetime of the project in line with the Final Offshore Construction and Environmental Management Plan (CEMP). Furthermore, it is stated that this information will be used to inform the detailed design of the Proposed Project, to ensure that the risk of future exposure of the intertidal and offshore buried cables is as reduced as far as practicable. Natural England welcomes this approach. However, given the high sensitivity to cable exposure of the coast at Suffolk landfall, it is important that these uncertainties are addressed and that the most up to date data

			available are used to inform the additional analysis of coastal erosion over the Proposed Project lifetime.
2	1.9.136	Natural England notes that it is stated that the Project's <i>"engineers have advised that the maximum combined length of rock protection would cover 50% of the 3.2 km section [adjacent to Goodwin Sands MCZ]."</i> This would equate to up to 1.6km of rock protection adjacent to the MCZ, which appears to contradict Commitment MPE13 which <i>"commits to limiting its use to no more than 500 metres in total, whether continuous or cumulative, within sections of the offshore cable corridor adjacent to the Goodwin Sands MCZ."</i>	Natural England continues to seek clarification on the MDS length of rock protection that may be required to be placed adjacent to Goodwin Sands MCZ.

Table 3: Natural England's Advice on Physical Processes

Document reviewed: [REP7-158] 9.84 (E) Register of Environmental Actions and Commitments (REAC) (Tracked), [REP7-360] Late submission accepted at the discretion of the Examination Authority - 9.84 (F) Register of Environmental Actions and Commitments (REAC) (Tracked) & EN020026-003932-C1-216 - 9.84 (G) Register of Environmental Actions and Commitments (REAC) (Tracked)			
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	GM08	Natural England notes that the Applicant is committed to factoring removability of cable protection into its decision-making at the Construction Stage of the Proposed Project. We note that this commitment is secured in the CSIP and Offshore CEMP, which is welcomed. However, we note that there is still no commitment to remove all infrastructure at the time of decommissioning.	This specific issue in regard to removability of cable protection is considered resolved. However, Natural England continues to advise that commitment should be secured through the DCO for the removal of all infrastructure at the time of decommissioning, both within and outside of designated sites unless otherwise agreed through a OPSAR derogations case
2	GM09	The Applicant has committed to "no planned freespan...as part of the Proposed Project." However, Natural England notes that this commitment has not, as indicated, been included in the Outline Offshore Construction Environment Management Plan (CEMP) [REP7-128]. It is also not stated what steps will be taken to avoid freespan. Nor within the	We advise that this commitment should be added to the Outline Offshore CEMP, as stated. Furthermore, the Applicant should state how this commitment will be achieved.

		update provided uploaded onto the PINs website on 19 th October 2026 [C3-009]	
3	MPE02	Natural England notes MPE02 has not been updated to factor in deeper cable burial below the mouth of the low flow Stour channel, mitigate for the risk of the installed cable interacting with the migrating channel. This concern remains as it has implications for coastal morphology receptors. However, we do note that the Applicant has updated their commitment to monitoring [REP7-168] post-consent through pre-installation surveys and throughout the operational lifetime of the Project. A trigger for intervention (i.e. consultation with the EA) has also been included if the channel migrates to within 50m of the cable. This is welcomed.	Natural England welcomes the Applicant's commitment to undertake monitoring post-consent ' <i>to identify any material change in channel position, morphology, or migration over time.</i> ' However, we continue to highlight that the risk remains that the installed cable could interact with a migrating channel, with potential implications for coastal morphology receptors.
4	MPE06	Natural England notes that the Applicant commits to monitoring of the beach profile and erosion rates, over the operational lifetime of the Project, at both the Suffolk and Kent landfall sites in relation to the trenchless technique construction areas associated with the exit pits. Whilst landfall monitoring is welcomed, Natural England does not consider that it is sufficient to allow detection of changes to coastal (nearshore and intertidal/beach) morphology due to the installed cable/buried infrastructure through the lifetime of the Project.	Natural England advises that the Applicant should monitor beach profile (vertical elevation) change and coastal erosion (lateral landward shift) at both landfalls during the operational phase. This should cover the full extent of the nearshore and beach/intertidal at both landfalls to ensure there are no unexpected changes to coastal morphology receptors, assess seabed recovery and cable burial depth, and to validate ES/HRA conclusions. In addition, Kent landfall monitoring should encompass the saltmarsh limit, access routes between the hoverport and HDD working area, and the River Stour channel.
5	MPE14	Commitment MPE14 aims to ensure a minimum depth for the drilled alignment of the trenchless technique at the Suffolk landfall to provide a conservative margin against reasonable worst case future coastal change and erosion over the lifetime of the Proposed Project. This commitment is welcomed, however, as advised in Table 2 above, we have concerns about the long-term sufficiency of the estimates of cable burial depth and potentially the landward setback distance.	As identified by the Applicant, the coast at Suffolk landfall has high sensitivity to cable exposure. Therefore, we consider it important, that the uncertainties identified by the Applicant in their estimates of minimum cable burial depth (see Table 2 above), should be addressed and that the most up to date data available used to inform detailed design of the Project, and to ensure that the risk of future cable exposure is reduced as far as practicable.

Table 4: Natural England's Advice on Physical Processes

Document reviewed: [REP7-160] 9.92 Outline Cable Specification and Installation Plan (Tracked)			
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	2.2.10-2.2.13	Natural England notes that a (Pegwell Bay) Hoverport Condition Monitoring Plan post-consent monitoring plan will be prepared for monitoring the condition of the hoverport during construction, including measures for identifying and managing any potential contamination risk. Furthermore, it is stated that construction and maintenance access via the hoverport will be subject to measures to protect the hoverport hardstanding, prevent contamination pathways, and avoid/minimise associated impacts. These plans are welcomed. However, we reiterate our earlier advice that currently there is limited or no information on potential impacts to the coastal/marine environment associated with the hoverport use/access during construction and operation.	Natural England will welcome the opportunity to be consulted on the Hoverport Condition Monitoring Plan post-consent, including the necessary measures for identifying and managing any potential contamination risk. However, we continue to highlight that currently there is insufficient information to inform understanding of the potential implications for the coastal/marine environment due to use of the hoverport for access during construction and operation.
2	2.28	Natural England notes that cable pull-in has been added to the CSIP. This includes a requirement for a beached barge/jack-up barge (JUB) at Kent landfall to transport the cable(s) to the exit pit location. It is unclear if this is an additional requirement to the of JUB included for Phases 1A, 1B and 2 (Table 1-19 in [REP7-098], and also whether the MDS for JUB seabed disturbance has now increased.	Natural England seeks clarification that the MDS remains unchanged for impacts to inshore seabed morphology/designated coastal feature receptors due to construction activities.

		We also note that for the Kent landfall, up to four excavators may be required to assist with cable pull-in which is double the amount quoted in [REP7-146] Pegwell Bay Construction Method Technical Note (Version E). Again, it is unclear whether this increase would change the MDS for seabed morphology impacts due to marine cable pull-in.	
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Table 5: Natural England's Advice on Physical Processes

Document reviewed: [REP7-168] 9.140 (B) Outline In-Principle Monitoring Plan (Tracked)			
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	3.2.7	Natural England also notes and welcomes the commitment to monitor seabed levels during the presence of the cofferdam in the intertidal at the Kent landfall. We also welcome the commitment for intervention if the monitoring demonstrates that scour is greater than predicted.	N/A
2	3.2.8	Natural England notes that the Applicant has committed (MPE06) to monitoring beach profile and erosion rates at both landfall sites only in relation to the HDD construction areas associated with the exit pits. We do not consider this sufficient to establish potential changes in coastal morphology (nearshore and intertidal) due to cable installation and/or operational activities.	As advised in Table 3 above, the proposed monitoring should cover the full extent of the nearshore and beach/intertidal areas at both Kent and Suffolk landfalls that may be impacted by cable installation and operation through the lifetime of the Project. In addition, Kent landfall monitoring should encompass the saltmarsh limit, access routes between the hoverport and HDD working area, and the River Stour channel. This is required to ensure there are no unexpected changes to the nearshore seabed and beach/intertidal morphology at both landfalls, and to assess seabed recovery and cable burial depth, and validate ES/HRA conclusions.