



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Sea Link Energy Cable

**Appendix E8 for Natural England's Response to the All Interested Parties – Invitation
to Comment
Natural England's Additional Comments on Intertidal and Benthic Ecology**

For:

The construction and operation of the Sea Link Energy Cable

Planning Inspectorate Reference EN020026

21st October 2026

Appendix E8 Natural England's Advice on Sea Link All Interested Parties – Invitation to Comment

Benthic Ecology

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

Sea Link All Interested Parties – Invitation to Comment Submission 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 submitted on the for the Request for Further Information (18 Sept 2026). However, our position in terms of Benthic Ecology has not changed from our previous position provided at the RFI (18 Sept 2026) as the tracked change updates relevant to benthic receptors within the reviewed documents (see above) mostly relate to the change of wording for landfall works from Horizontal Directional Drilling (HDD) to 'trenchless techniques'. Natural England is concerned that alternative trenchless techniques to HDD have not been adequately assessed or mitigated for. Please see the detailed comments below in Table 1 and 2, and our updated Risks and Issues Log (Tab E) for further information.

2. Natural England's Detailed Comments on Benthic Ecology

Natural England notes that documents have been updated to change the landfall methods at Suffolk and Kent from Horizontal Directional Drilling (HDD) to 'trenchless techniques'. Natural England has concerns that alternative trenchless techniques have not been adequately

considered within consultation documents or during examination, the environmental impacts have not been assessed and therefore, appropriate mitigation may not have been secured.

'Direct Pipe' is described as an alternative trenchless technique to HDD within the Description of the Proposed Project (6.2.1.4) (E), but it is not considered further due to footprint and installation parameters being similar. However, Natural England highlights that direct pipe has a different methodology to HDD which may result in different environmental impacts which need to be considered and assessed. For example, direct pipe is likely to result in greater excavated material and spoil which will need to be managed.

As set out in our cover letter, direct pipe, or other trenchless techniques, may pose additional environmental impacts and pathways which differ to HDD and may have not been adequately assessed during the examination process and that appropriate mitigation may not have been secured.

3. Detailed comments:

Table 1: Natural England's Advice on Benthic Ecology

Document reviewed: 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	Table 3.2	Natural England questions why commitment B60 has been changed to refer to Suffolk landfall only. We also question whether National Grid have similar commitments to notify Natural England and other bodies of methods, locations, routes for spotters and remedial works in event of frac-out for the Kent landfall works.	Natural England advises that clarification should be provided as to whether similar commitments are secured for Kent landfall works, and if not, commitments to notify appropriate bodies (including Natural England) should be secured.
2	Table 3.1	Natural England notes that commitment GH10 only requires a drilling fluid management plan for where horizontal directional drilling (HDD) is proposed. We note that all trenchless techniques are currently being considered, beyond HDD.	Natural England advises that the wording of commitment GH10 should be altered to require drilling fluid management and mitigation for all trenchless techniques.
3	Table 3.3	Natural England welcomes updates to commitment GG45 to include a definition of emergency works and a requirement to notify Natural England and Thanet District Council in the event of emergency hovercraft use.	Natural England advises that further commitments are required to resolve this issue, such as mitigation measures and a hovercraft code of conduct prepared with and agreed with all relevant parties to minimise the environmental risk as far as reasonably practicable. Natural England refers to advice provided on 18th September 2026 in response to the Secretary of State's Request for Information (RFI).

Table 2: Natural England's Advice on Benthic Ecology

Document reviewed: EN020026-003911-C1-195 - 7.5.2 (F) Outline Offshore Construction Environmental Management Plan (Tracked Changes)			
NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	Table 1.9	Natural England questions why commitment B60 has been changed to refer to Suffolk landfall only. We also question whether National Grid have similar commitments to notify Natural England and other bodies of methods, locations, routes for spotters and remedial works in event of frac-out for the Kent landfall works.	Natural England advises that clarification should be provided as to whether similar commitments are secured for Kent landfall works, and if not, commitments to notify appropriate bodies (including Natural England) should be secured.
2	Table 1.8	Natural England notes that commitment GH10 only requires a drilling fluid management plan for where horizontal directional drilling (HDD) is proposed. We note that all trenchless techniques are currently being considered, beyond HDD.	Natural England advises that the wording of commitment GH10 should be altered to require drilling fluid management and mitigation for all trenchless techniques.
3	Table 1.9	Natural England welcomes updates to commitment GG45 to include a definition of emergency works and a requirement to notify Natural England and Thanet District Council in the event of emergency hovercraft use.	Natural England advises that further commitments are required to resolve this issue, such as mitigation measures and a hovercraft code of conduct prepared with and agreed with all relevant parties to minimise the environmental risk as far as reasonably practicable. Natural England refers to advice provided on 18th September 2026 in response to the Secretary of State's Request for Information (RFI).