



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Sea Link Energy Cable

Appendix D3 to the Natural England Deadline 3 Submission
Natural England's Marine Physical Environment Advice on the Applicant's Pre-Deadline 1 and Deadline 1 Documents

For:

The construction and operation of Sea Link Energy Cable

Planning Inspectorate Reference EN020026

9th January 2026

Appendix D3 Sea Link Deadline 3 Marine Physical Environment

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

Sea Link Pre-Deadline 1 Submission Documents

- [AS-007] 6.6 (B) Report to Inform Habitats Regulations Assessment
- [AS-114] 6.2.4.1(A) Part 4 Marine Chapter 1 Physical Environment (Tracked)
- [AS-035] 9.5 (A) Subtidal Survey Report
- [PDA-037] 9.20.1 Landfall Sediment Modelling Report Aldeburgh
- [PDA-038] 9.20.2 Landfall Sediment Modelling Report Pegwell Bay
- [PDA-039] 9.21 Sea Link Cable Burial Risk Assessment

Sea Link Deadline 1 Submission Documents

- [REP1-010] 6.4.4.4.1 (B) Environmental Statement Figures Marine Physical Environment (Tracked)
- [REP1-016] 6.4.4.11 (B) ES Figures Marine Inter-Project Cumulative Effects (Tracked)
- [REP1-018] 6.4.4.11.A (B) ES Figures Marine Description of Other Projects (Tracked)
- [REP1-022] 6.11 (B) Marine Conservation Zone Assessment (Tracked)
- [REP1-052] 6.2.4.1 (C) Part 4 Marine Chapter 1 Physical Environment (Tracked)
- [REP1-072] 6.6 (C) Report to Inform Habitats Regulations Assessment (Tracked)
- [REP1-103] 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Tracked)
- [REP1-108] 9.13 (A) Pegwell Bay Construction Method Technical Note (Tracked)

Detailed comments

Table 1: Natural England's Advice On: [AS-007] 6.6 Report to Inform Habitats Regulations Assessment (Version B)

NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	Ex1.4.5	Based on the comments Natural England has provided below; we are unable to agree with the HRA conclusions. We also consider that not all impact pathways of effect on sensitive designated site features have been identified.	Owing to the uncertainty of risks posed by construction and operational activities at the Kent landfall to ecological receptors, we are currently unable to agree with the conclusions of the HRA. We advise that all pathways of effect on sensitive designated site features should be identified and considered. Please see additional comments provided below for explanation.
2	4.3.4 & 4.3.34	Natural England welcomes the Applicant's efforts to avoid direct disturbance impacts to saltmarsh habitat at the Kent landfall. However, we are concerned that total intertidal seabed disturbance and disruption to coastal processes due to construction activities will impact on an area greater than the proposed 0.02km ² . As demonstrated by the numerous cable installation activity seabed disturbance impacts detailed in, for example [REP1-108].	The most up-to-date information on proposed construction activities at the Kent landfall/Pegwell Bay should be used to inform the HRA for seabed disturbance impacts to designated sites/features and disturbance to supporting habitat and species.
3	4.3.10	Natural England advises that owing to uncertainty regarding the WCS for increases in SSCs and subsequent sediment deposition (leading to increased turbidity and smothering) due to construction activities at the Kent landfall, further information is needed to support the HRA conclusions.	The most up-to-date information on proposed construction activities at the Kent landfall/Pegwell Bay should be used to inform the HRA for increased SSCs and subsequent sediment deposition (and thus increased turbidity and smothering).
5	7.3.68	It is stated that the footprint of disturbance due to cable installation at the Kent landfall, will be limited and temporary. It is also stated that although disturbance will occur a second time (due to burial of permanent protection at the trenchless exit/entry points), the effect will be temporary [on fauna]. There is uncertainty regarding the WCS disturbance footprint for cable installation activities which needs to	We advise that clarification of the WCS disturbance footprints for cable installation activities is needed to support and inform the HRA conclusions for the Kent landfall/Pegwell Bay.

		be addressed to demonstrate that effects will be limited and temporary Natural England is also concerned in relation to the operation impacts from any bury protection becoming exposed due to coastal erosion	
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Table 2: Natural England's Advice On: [PDA-037] 9.20.1 Landfall Sediment Modelling Report Aldeburgh

NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	N/A	The Applicant has provided the Landfall Sediment Modelling Report for Aldeburgh which is welcomed.	This issue is resolved.
2	Figures 10 and 22.	The extent to which the cable route overlaps or runs adjacent to the Aldeburgh Napes and Ridge is unclear and not presented consistently across the relevant documents. Therefore, the extent to which the Aldeburgh Napes and Aldeburgh Ridge may be affected, through the lifetime of the Project, remains unclear. For example, through changes to waves, hydrodynamics, and sediment transport due to the placement of cable protection or adjacent to the sandbank systems.	The extent to which cable installation and cable protection could affect the Aldeburgh Napes and Aldeburgh Ridge needs to be clarified. Given the complexity of this sandbank system and the movement of sediment within and around it, it is important to understand both its morphodynamics and, in turn, the nature of any impacts on it due to the placement of cable protection measures.
3	Figure 1, and Sections 1.2 & 3.5.2	<p>Further to our Rel Reps advice [RR-3290], we note that all three HDD exit options appear to be located in areas where Coralline Crag is present yet there is no assessment of potential impacts on the Coralline Crag due to the HDD or cable installation at landfall.</p> <p>We draw the ExA attention to previous energy projects including Sizewell C and East Anglia 1N and East Anglia 2 which have all designed their projects to avoid impacts to this unique irreplaceable geological feature only found in the area around Aldeburgh and Orford</p>	In [AS-114] it is stated that the HDD exit point will target an exit location that will be designed such that there is not a risk of exiting where the Coralline Crag is at the surface. It is also stated that during detailed design, the HDD contractor will microsite the exit points based on seafloor surveys and ground investigations. However, in [PDA-037] it is stated that all 3 potential points will go through the crag, and it is not stated whether drilling through this geological feature may have any impacts on the crag. This needs to be clarified. We reiterate our earlier advice that potential impacts on the Coralline Crag due to cable installation and HDD need to be fully assessed. Furthermore, we advise that impacts to the Coralline Crag should be avoided and/or minimised when

			selecting the marine exit site and onwards cable installation works.
4	Sections 3.2.2 & 3.2.3	We note that the coastal erosion assessment refers to the National Coastal Erosion Risk Mapping (NCERM) project data, however, we would advise that NCERM has been superseded.	We advise that the most recent NCERM data should be considered as part of an updated impact assessment

Table 3: Natural England's Advice On: [PDA-038] 9.20.2 Landfall Sediment Modelling Report Pegwell Bay

NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	General comment	Natural England advised previously that the Landfall Assessment at Pegwell Bay should be provided by the Applicant.	The Applicant has now provided this report (and the corresponding report for the Suffolk landfall). This issue is, therefore, resolved.
2	Page 17	Natural England notes that the report refers to National Coastal Erosion Risk Mapping (NCERM) Project data. However, we advise that this has been superseded by NCERM2.	We advise that the most recent NCERM data should be considered as part of an updated impact assessment.
3	Section 4	Natural England notes that the Applicant has further assessed historical changes in intertidal and subtidal elevation, nearby beaches, migration of Shell Ness and the River Stour channel, which is welcomed. However, a number of potentially significant risks remain regarding adequate cable burial and siting of the landfall infrastructure over the lifetime of the Project, as detailed in the comment below.	Whilst the Applicant has considered future vertical elevation changes to the beach/intertidal and coastal retreat rates at landfall, as advised, we note that this report highlights further uncertainty regarding cable burial and landfall infrastructure vulnerability over the lifetime of the Proposed Project. Please see further comments on this below.
4	Section 5/Page 62	Whilst we welcome the Applicant's landfall assessment, the report has highlighted a number of potentially significant risks to adequate cable burial and siting of landfall infrastructure (e.g. Transition Joint Bay) over the lifetime of the Project. These include: <ul style="list-style-type: none"> Continued migration of the River Stour channel northwards towards the cable route 	Natural England advises that the onus is on the Applicant to adequately assess and manage the risks and uncertainties for cable exposure and landfall infrastructure vulnerability, which is of vital importance. Further assurance is needed to demonstrate that landfall infrastructure and construction activities will not be affected by morphological change over the project lifetime (i.e. 40-60 years) or vice versa, interrupt coastal processes and affect coastal morphology and/or sensitive benthic/supporting habitats.

		<ul style="list-style-type: none"> • Erosion and flooding potential of the cable corridor area at the coastline • Future changes to the drivers of sediment transport in the area (e.g. tidal currents, wave climate, nearshore shoals, and banks) • Climate change effects (e.g. mean sea level rise, increased erosion rates, shoreline retreat) • Future shoreline management policy changes. 	
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Table 4: Natural England's Advice On: [REP1-052] 6.2.4.1 (C) Part 4 Marine Chapter 1 Physical Environment (Tracked) & [REP1-010] 6.4.4.4.1 (B) Environmental Statement Figures Marine Physical Environment (Tracked)

NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	General comment	<p>In [REP1-033] it is stated that this ES chapter has been '<i>updated in response to Relevant Representations from various stakeholders and to incorporate information from Application Document 9.13 Pegwell Bay Construction Method Technical Note.</i>' However, Natural England highlights that we have found it difficult to identify where changes have been made to this ES chapter, apart from the following:</p> <ul style="list-style-type: none"> - Sections 1.7.67 - Table 1.18 <p>We also note that Figures 6.4.4.1.13 and 6.4.4.1.14 have been added to [REP1-010].</p>	We advise that for future updated documents, ES chapters etc that the changes/updates made should be clearly identified within that document and, where possible, signposted.
2	1.7.67	<p>It is stated that "<i>It is considered highly unlikely that the River Stour low water channel will migrate northwards to coincide with the buried cable alignment during the operational life of the Proposed Project.</i>" Furthermore, it is stated that ongoing maintenance dredging by the</p>	Further consideration should be given to the risk posed by Stour channel migration to the cable burial depth over the lifetime of the Project.

		local port authority has helped stabilise the channel position further reducing the risk of future channel migration. However, the evidence presented in [PDA-038] highlights the uncertainty regarding the future position of the River Stour channel relative to the position of the proposed cable route. Therefore, we remain concerned, that future channel migration coupled with potential changes in channel maintenance dredging plans, climate change impacts etc pose a risk to the buried cables over the lifetime of the Project.	
3	Table 1.18	We welcome confirmation that there is no requirement for use of a cofferdam at the Suffolk landfall.	Can the Applicant signpost/confirm where this commitment is secured, to resolve this issue
4	1.10.1	Additional mitigation measure MPE06 ensures that over the operational lifetime of the Proposed Project monitoring of the beach profile and erosion rates will be carried out at the Suffolk landfall site where protection is planned to be placed at the HDD exit pits. However, there is no similar commitment for the Kent landfall. We would advise that owing to the nature conservation and supporting habitat importance of Pegwell Bay and potential for impacts to the coastal and nearshore morphology due to the installation and protection of cables in the intertidal and shallow subtidal areas over the long-term (40-60 years), that monitoring should also be carried out at the Kent landfall.	<p>We advise that a similar commitment to MPE06 should be adopted for the Kent landfall through monitoring of change in the intertidal and shallow subtidal areas, in particular where protection is planned to be placed at the HDD exit pits.</p> <p>We also note that commitment MPE05 [REP1-103] ensures depth of burial monitoring surveys will be undertaken post installation. We would, therefore, advise that the same commitment should be made for Pegwell Bay. In addition, we would advise monitoring to validate ES predictions regarding changes to nearshore seabed morphology (and associated flow dynamics), seabed recovery, and to ensure there are no unexpected changes to intertidal/shallow subtidal morphology. Furthermore, for this to be considered mitigation we advise that any monitoring conditions should also include a requirement to undertake remediation measures where required.</p>
5	1.9.23	Natural England notes that the WCS cofferdam parameters at each HDD exit pit are as follows: 10-15 m in length, 3-5 m width, and 2 m depth below seabed level. However, in [REP1-108] it is stated that the assessed WCS assumes the construction of smaller	Natural England advises that the EIA should be updated accordingly, taking into account the larger cofferdam size proposed, seabed disturbance area and volume, blockage potential, and scour potential. Duration and timing of the

		cofferdams (maximum length 30m, width 5m, piling depth approx. 6m below ground level and 2m excavation depth within the cofferdams) on four separate occasions. Therefore, we remain concerned, that the increased WCS cofferdam size represents an increase not only in intertidal sediment disturbance, but also blockage potential, which could modify waves and/or current flows around the structure, affecting sediment transport, and leading to morphological change.	cofferdam installation and presence should be taken into account.
6	1.9.24	Natural England also advises that an increase in WCS cofferdam size will have accompanying increase in seabed disturbance footprint, potential blockage effect and scour potential. Therefore, further consideration of predicted seabed recovery time associated with the larger cofferdam size and impacts to the seabed is required.	We advise that the implications of the larger cofferdam dimensions to the EIA conclusions should be considered and evaluated, in terms of the scale and duration of seabed morphological impacts. This should also include the WCS predicted nearshore seabed recovery time.
7	1.9.36	It is stated that the Offshore Scheme installation largely avoids the Aldeburgh Napes and the magnitude of impact to them is likely to be small. However, the magnitude of the impact has not been quantified. This information is needed to inform the impact assessment and support the EIA conclusions.	We advise that the scale/extent of cable installation impacts on the Aldeburgh Napes need to be provided to inform the impact assessment and support the EIA conclusions.
8	1.9.70 & Table 1.19	Natural England highlights that the presence of cable protection measures adjacent to Goodwin Sands MCZ, or their potential to modify sediment transport processes, is not discussed. Yet, the Offshore Scheme boundary runs adjacent to the boundary of Goodwin Sands MCZ for approximately 3.2 km, between KP107.3 to KP110.5. If cable protection were to be placed adjacent to the MCZ, it could modify the sediment transport regime and hinder the conservation objectives of the protected features of the MCZ. Therefore, we are unable to agree with the assessment of minor effect significance.	Natural England advises that the potential impacts to Goodwin Sands MCZ and Cross Ledge Sandbanks from the placement of cable protection should be clarified and assessed. If relevant, the total area and volume of external cable protection in Cross Ledge Sandbanks should be provided. Evidence should also be provided to support the assessment conclusions and assumptions regarding their resilience and sensitivity to cable protection measures placed on/adjacent to them.

		With regards to Cross Ledge Sandbanks, the potential for, and magnitude of, impacts to these features due to the presence of cable protection is not clear. Without supporting evidence, it is not clear how the sensitivity rating of medium has been reached, or assumption that the Cross Ledge Sandbanks would be resilient to the presence of cable protection. Therefore, we are unable to agree with the conclusion of minor effect significance.	
9	Figure 6.4.4.1.11 Sheet 1 (Offshore Seabed Surficial Geology Overview Sheet)	We note that Figure 6.4.4.1.11 Sheet 1 (Offshore Seabed Surficial Geology Overview Sheet) identifies a number of Reefs and sandbanks not in a designated site. It is unclear whether these features may be affected cable protection measures placed on or adjacent to them.	We advise that the Applicant should provide an indicative map of proposed cable protection locations relative to these features to inform the impact assessment on marine processes.

Table 5: Natural England's Advice On: [REP1-108] 9.13 Pegwell Bay Construction Method Technical Note (Version A) (Tracked)

NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	2.2.2-2.2.7	We note that a requirement has been identified for two access routes onto the Pegwell Bay intertidal mudflats during all stages of landfall construction and cable installation and, if required, during operation for maintenance purposes. These two access routes would be via the disused hoverport at the northern end of the bay, and by transportation from the sea.	We strongly advise that all impact pathways and maximum design scenario for the proposed access routes across the intertidal should be identified for the marine physical environment and the EIA updated accordingly. Furthermore, consideration should be given to the nature and extent of impacts to sensitive intertidal and subtidal habitats/qualifying features through the lifetime of the Proposed Project.

		<p>The final location and width of the access routes across the mudflats will be determined pre-construction.</p> <p>We also note that there may be a requirement to install temporary road plates (steel sheet piles and steel support waling and struts) or bog mats at locations where the former hoverport access corridor crosses the Nemo and Thanet cables.</p> <p>The relevant impact pathways and maximum design scenario for these access routes have not yet been defined or assessed for the marine physical environment.</p>	
2	4.2.15	<p>Natural England advises that there may be cumulative/in-combination effects on nearshore hydrodynamics, sediments, sediment transport, morphology due to the placement of the proposed HDD exit protection in the nearshore and other nearby projects/activities. In turn, there is the potential for a cumulative or in combination effect on sensitive intertidal or subtidal receptors.</p>	<p>We advise that the Applicant needs to consider potential cumulative/in-combination effects on nearshore hydrodynamics, sediments, sediment transport, and morphology arising from the Proposed Project during all phases, and other nearby projects/activities (e.g. due to cable/HDD exit protection placement).</p>
3	2.3.3	<p>It is stated that the assessed WCS assumes the construction of smaller cofferdams (maximum length 30m, width 5m, piling depth approx. 6m below ground level and 2m excavation depth within the cofferdams) on four separate occasions. However, we noted that this is considerably greater than the cofferdam dimensions assessed in [REP1-052] (the Marine Physical Environment ES chapter) which are as follows: 10-15 m length x 3-5 m width x 2 m depth.</p>	<p>We advise that the WCS cofferdam dimensions and seabed disturbance area, volume, and duration, should be clarified and all relevant documents and assessments updated accordingly.</p>
4	Section 2.3	<p>Natural England notes that three different cofferdam construction options are proposed including prefabricated filled tanks, a barge with moonpool grounded after positioning, or piled sheeting. However,</p>	<p>As above, we advise that the WCS cofferdam construction parameters should be clearly defined and assessed consistently across the relevant documents.</p>

		the Marine Physical Environment chapter [REP1-052] states that either multiple or one large moonpool or piled cofferdam will be constructed. As discussed above, the WCS cofferdam construction parameters are not clear.	
5	Section 2.4	Natural England notes that the proposed cofferdams and HDD exit pits will be located within a temporary working area of 21,600m ² . It is stated that all construction plant and vehicles associated with the trenchless crossing works will be required to remain within this working area at all times, unless the HDD contractor's selected methodology for duct installation is to use a pulled, as opposed to a pushed, method. A pulled duct installation method would require access along the intertidal for placement of duct rollers on the intertidal seabed and potentially extend 1km seaward over a width of 10m. The impact pathways and maximum design scenario (MDS) parameters for the temporary HDD working area, pulled and pushed duct installation methods have not been considered or assessed in [REP1-052], the Marine Physical Environment chapter.	We strongly advise that all impact pathways and MDS parameters for the temporary HDD working area, and pulled and pushed duct installation methods, need to be considered and assessed in the EIA for marine processes and other ecological receptors. And further innovation to minimise the impacts considered. Such as those used in The Wash for HDD including use of offshore barges to store equipment and avoid need for cofferdams
6	Sections 3 & 4	Following completion of the HDD, various marine cable pull-in and cable burial (installation) and removal of temporary access activities are proposed which have the potential to impact the marine physical environment in varying degrees. For example, through installation of cofferdams, beaching of the cable laying barge, anchoring, cable rollers, marine cable pull-in, and marine cable burial works. The relevant impact pathways and MDS parameters have not been clearly identified in the ES Marine Physical Environment chapter [REP1-052] or fully considered or assessed fully in the EIA.	As above, we advise that all impact pathways and MDS parameters for the HDD drilling and duct installation parameters need to be clearly identified, considered and assessed in the EIA for marine processes and other ecological receptors.

7	Table 2.1	Natural England advises that the deposition location and MDS parameters of material derived from HDD exit pit/cofferdam excavation are unclear in this technical note.	We strongly advise that this needs to be clarified. Storage options should be discussed. Potential impacts such as localised flow and wave moderation and winnowing away of the excavated material should be considered and assessed, accordingly.
8	General comment	Natural England is concerned that the works and activities proposed have the potential to mobilise sediments, significantly increase suspended sediment concentrations (SSCs) and sediment deposition in Pegwell Bay and its overlapping nature conservation sites.	We advise that the potential to mobilise sediments, increase SSCs and sediment deposition in Pegwell Bay due to the proposed construction and operation activities should be considered and assessed in an update to the EIA.
9	4.2.15	<p>Natural England notes that post-installation protection will be added to stabilise the HDD exits and the top of this protection would be approx. 0.5m below the seabed. However, in [REP1-103] it is stated that at the Kent landfall, a target depth of lowering of 1.5 m will apply to allow for the potential future lowering of the intertidal bed levels. This would suggest that the depth of HDD exit protection burial would not be sufficient to allow for potential future lowering of the intertidal bed levels. This needs to be clarified.</p> <p>This technical note does not provide details of any other requirements for protection of buried assets within Pegwell Bay. However, owing to potential impacts to marine physical processes and sensitive habitats within the nearshore and inter-tidal areas where the cables make landfall, our standard advice is for there to be no cable protection within the 10m depth contour.</p>	<p>With regards to cable protection within the shallow nearshore and intertidal waters of Pegwell Bay, Natural England's default advice is for there to be no cable protection placement within the 10m depth contour. We, therefore, advise that this should be secured as a condition.</p> <p>We advise that further information and clarification is needed to demonstrate the adequacy of HDD exit protection depth relative to future lowering of the intertidal bed levels.</p>

Table 6: Natural England's Advice On: [REP1-022] 6.11 (B) Marine Conservation Zone Assessment (Tracked)

NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	1.5.27-1.5.30, 1.7.22, 1.7.29	Natural England notes that it is stated that no cable protection will be placed within Goodwin Sands MCZ. However, we also note that potential cable protection placement adjacent to the MCZ is not considered in the MCZA. The Offshore Scheme boundary runs adjacent to the boundary of Goodwin Sands MCZ for approximately 3.2 km, between KP107.3 to KP110.5. We advise that if cable protection were to be placed adjacent to the MCZ, it could modify the sediment transport regime and hinder the conservation objectives of the protected features of the MCZ.	We advise that the Applicant should clarify whether there is the potential for cable protection to be placed adjacent to Goodwin Sands MCZ over the lifetime of the Project. If the Applicant considers that it is unlikely that cable protection will be required adjacent to the MCZ, then we advise that this should be secured as a condition. If cable protection is considered to be a requirement for cable protection adjacent to the MCZ, then its potential to interrupt or modify sediment transport should be assessed. In turn, consideration should be given to the conservation objectives of the protected features of the MCZ.

Table 7: Natural England's Advice On: [REP1-072] 6.6 (C) Report to Inform Habitats Regulations Assessment (Tracked)

NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	Section 3.14	We note that the conservation objectives and environmental vulnerabilities for the Thanet Coast SAC have been updated in this section. These have been based on 2015 information. However, we would advise that the most up-to-date information should be considered.	We refer the Applicant to Natural England's Designated Sites View website for our most recent guidance and conservation advice on Thanet Coast SAC (see Designated Sites View) and assessments updated accordingly
2	7.3.67	We note that the Applicant does not anticipate that physical disturbance would have any AEoSI on the qualifying features of the Thanet Coast and Sandwich Bay SPA and Ramsar. However, owing to uncertainties regarding potential risks due to cable installation at the Kent landfall, as detailed in our comments above, we are unable to agree with the conclusions drawn.	As discussed in our advice on [REP1-108], [PDA-038], and [REP1-052] above, further information and clarification is needed on potential physical disturbance to the intertidal and subtidal mud/sand flats in Pegwell Bay and, in turn, qualifying SPA and Ramsar features due to cable installation activities.
3	7.3.75	Please see our advice on [AS-007] above regarding the potential for introduction and spread of INNS due	Further clarification is needed.

		to placement of concrete mattresses at the trenchless entry/exit points in the upper and intertidal mud/sandflat areas at the Kent landfall, and the use of a moonpool or prefabricated cofferdam.	
4	Appendix F	We note that there is a cover page included for Appendix F Technical Note: Hydrological Impacts at Kent Landfall, however, the appendix does not appear to be attached.	Natural England requests that this technical note/appendix is submitted into examination for further review given the high-risk issues raised in our written representations

Table 8: Natural England's Advice On: [REP1-103] 7.5.3.2 CEMP (B) Appendix B Register of Environmental Actions and Commitments (REAC)

NE Ref	Section	Key Concern and/or Update	Natural England's Advice to Resolve Issue
1	MPE02	<p>As advised on [PDA-038] above, the Applicant's landfall assessment highlights several potentially significant risks to adequate cable burial and siting of landfall infrastructure (e.g. Transition Joint Bay) over the lifetime of the Project. These include:</p> <ul style="list-style-type: none"> Continued migration of the River Stour channel northwards towards the cable route Erosion and flooding potential of the cable corridor area at the coastline Future changes to the drivers of sediment transport in the area (e.g. tidal currents, wave climate, nearshore shoals, and banks) Climate change effects (e.g. mean sea level rise, increased erosion rates, shoreline retreat) Future shoreline management policy changes. <p>We are, therefore, concerned that the target Depth of Lowering of 1.5 m at the Kent Landfall may not be sufficient to accommodate potential future lowering of intertidal bed levels.</p>	We advise that, based on the uncertainties and potential risks to future cable burial success at Kent landfall, that the target DOL may not be sufficient and further assurance is needed to demonstrate that landfall infrastructure and construction activities will not be affected by morphological change over the project lifetime and vice versa.

2	MPE06	We welcome the Applicant's commitment to carry out monitoring of the beach profile and erosion rates at the Suffolk landfall site over the operational lifetime of the Proposed Project. However, we would wish to see the same commitment for the Kent landfall.	We advise that a similar commitment is made for monitoring of change at the Kent landfall intertidal elevation and coastline over the operational lifetime of the Proposed Project. Details should be provided in an In Principle Monitoring Plan with the commitment to undertake remediation actions should impacts beyond what was predicted be observed
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