THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010

Sea Link Energy Cable

Appendix D7 to the Natural England Deadline 7 Submission
Natural England's Marine Physical Environment Advice

For:

The construction and operation of Sea Link Energy Cable

Planning Inspectorate Reference EN020026

29th April 2026

Appendix D7 Sea Link Deadline 7 Marine Physical Environment

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

Sea Link Deadline 6 Submission Documents

- **[REP6-005]** 3.1 (I) draft Development Consent Order (Tracked)
- **[REP6-017]** 6.11 € Marine Conservation Zone Assessment (Tracked)
- **[REP6-027]** 6.2.4.1 (G) Part 4 Marine Chapter 1 Physical Environment (Tracked)
- **[REP6-029]** 6.2.4.2 (F) Environmental Statement Part 4 Marine Chapter 2 Benthic Ecology (Tracked)
- **[REP6-045]** 6.4.4.1 € Environmental Statement Figures Marine Physical Environment (Tracked)
- **[REP6-051]** 6.6 (H) Habitats Regulations Assessment Report (Tracked)
- **[REP6-073]** 7.5.2 (D) Outline Offshore Construction Environmental Management Plan (Tracked)
- **[REP6-095]** 9.104 (B) Areas of Safeguarded Water Depth Plan (Tracked)
- **[REP6-105]** 9.13 (D) Pegwell Bay Construction Method Technical Note (Tracked)
- **[REP6-116]** 9.140 Outline In-Principle Monitoring Plan
- **[REP6-119]** 9.143 (A) Pegwell Bay Saltmarsh Limits Topographic Survey March 2026 front and back cover
- **[REP6-120]** 9.144 Additional Sediment Dispersion Modelling – Technical Note
- **[REP6-135]** 9.84 (D) Register of Environmental Actions and Commitments (REAC) (Tracked)
- **[REP6-137]** 9.92 (C) Outline Cable Specification and Installation Plan (Tracked)

Please note due to the large volume of submitted documents at Deadline 6 with such a short timeframe before Deadline 7, it has not been possible to review the following documents in relation to Marine Physical Environment:

- **[REP6-103]** 9.123.1 (B) Applicant's Responses to Second Written Questions - Appendices (Tracked)
- **[REP6-106-112]** Applicant’s comments and responses at DL6.

1. Detailed comments

Table 1: Natural England's Advice on Physical Processes [REP6-027 & REP6-045].

Document reviewed: [REP6-027] 6.2.4.1 (G) Part 4 Marine Chapter 1 Physical Environment (Tracked) [REP6-045] 6.4.4.1 (C) Environmental Statement Figures Marine Physical Environment (Tracked)			
NE Ref	**Section**	**Key Concern and/or Update**	**Natural England's Advice to Resolve Issue**
1	Table 1.19 & 1.9.21	Natural England notes that it is stated that the engineering assessment '*has provided a high level of confidence that the ground conditions for the Proposed Project are sufficient to lower the cable along the entire cable route*' and the only exception is cable crossings. This is welcome, although we note that the WCS operational phase external cable protection allowance (Table 1.19) of 0.18km^2 includes 84,000m^2 of 1m-high rock berms. We also note that in [REP6-029] it is stated that the location of the proposed rock berms is currently unknown, hence a WCS has been estimated whereby rock berms may be required over a length of 12km of the offshore cable route. However, in [REP6-017], it states that "*Rock Protection will only be required in areas outside the High Risk Areas where natural backfill is too slow or the target depth of lowering is not achieved. This applies to the entire route except for high-risk areas (82 km)."* The indicative rock berm locations have not been provided.	We advise that the WCS remedial rock protection placement needs to be clarified, and an indicative layout map provided to inform the EIA/HRA/MCZA e, noting that this will be based on current available evidence and will need to be refined later. Key marine physical environment receptors and designated sites should be overlain on the map to inform the impact assessment(s).
2	Table 1.19, 1.9.4 & 1.9.13-1.9.14	Natural England remains concerned that the allowance for pre-sweeping/sandwave lowering and locations are not clear or consistently presented across relevant documents, for example: In [REP6-027] sandwave lowering/pre-sweeping covers only the section of the Offshore Scheme cable route from KP96.32-	We advise that the WCS pre-sweeping/sandwave lowering parameters need to be clarified and, where necessary, updated in the relevant documents/plans. An indicative layout of pre-sweeping locations also needs to be provided.

		KP113.883 (250,000m^3), however, it also refers to dredging at the Sunk Piloting Boarding Area which is not quantified. In Project Description [REP1A-004], the WCS sandwave lowering sediment volume is 250,000m^3 and located between KP96.32-KP113.883). In CSIP [REP6-095] in addition to the above volume, an additional section of pre-sweeping between KP38.7-KP44.4 is included, but it is stated here that the total pre-sweeping volume must not exceed 325,000m^3. In [REP-005] it includes pre-sweeping works at the Sunk Pilot Boarding Area, however, this has not been quantified or included in the marine physical environment assessment.	
2	1.8.4/MPE06 & 1.9.102-1.9.105	Natural England notes the additional consideration of the potential vulnerability of the Suffolk landfall in the event that the current Hold the Line policy ceases and under the WCS projected (NCERM, 2025) coastal erosion scenario. The evidence presented suggests that the trenchless ducts would be installed sufficiently deep and far enough inland to future proof buried assets against exposure due to coastal retreat and downward erosion. This should be validated through appropriate beach profile and coastal retreat monitoring at the Suffolk landfall.	In line with our previous responses, we advise that the Applicant needs to provide more specific details of the monitoring proposed for both landfalls. We also advise that landfall monitoring should not be restricted to the areas '*where rock bags are planned to be placed at the Horizontal Directional Drilling (HDD) exit pits*.', rather it should cover the full extent of the nearshore and intertidal at both landfalls, in addition to the area between the hoverport and HDD working area and the River Stour mouth/channel at Pegwell Bay to assess buried asset integrity and validate EIA/HRA conclusions regarding coastal receptor impacts and recovery.
3	1.8.4/MPE07 & 1.9.131-1.9.132	Natural England notes in MPE07 that reference to the placement of rock bags or mattresses at the Coralline Crag to protect the cable, has been removed, which is welcomed. However, the Embedded Measures (Section 1.8) have not been updated in line with this revision. We welcome confirmation that there are not expected to be any operational impacts on the Coralline Crag due to jack-up platforms or vessel anchoring, and that cable replacement works	This is welcomed and resolves issues regarding potential operational impacts on the Coralline Crag. Minor comment – we advise that the Embedded Measures (Section 1.8) should be updated in line

		within the HDD would be 45m beyond the nearest Coralline Crag outcrop.	with MPE07 by removing placement of rock bags/mattresses at the Coralline Crag.
4	1.8.4/MPE09 & 1.9.106	Nature England welcomes the Applicant's proposed monitoring [MPE09] through the lifetime of the Project, however, we remain concerned that considerable uncertainty remains regarding the future position of the river mouth/low water channel relative to the proposed cable route and a requirement for unanticipated remedial cable burial works/protection, should the cable become exposed in the event the channel migrates across the cable route. This could lead to additional impacts to important mud/sandflats within an internationally designated site. We also note that MPE09 includes contingency actions and a trigger point in the event of the River Stour migrating close to the Sea Link cable. Whilst this is welcomed, specific details are not included and therefore not agreed. Thus, this can't be considered sufficient mitigation measure to remove the risk of AEoI	Issue progressed. Natural England advises that the River Stour Channel monitoring should commence as soon as possible to inform the baseline, impact assessment, and detailed engineering. This would increase understanding of the environmental and engineering risks. In line with recommendations made in the Cable Burial Risk Assessment [PDA-039], we advise further assessment of the low water channel/river mouth topography and morphodynamics to better understand the long-term development of the River Stour channel in Pegwell Bay, and migration of the spit to the south. In turn, this will also increase understanding of the environmental and engineering risks. We also advise that the trigger point (distance of cable from migrating river channel/mouth) and contingency actions should be defined within the management measure to be considerate as mitigation.
5	1.9.5	Natural England welcomes the Applicant's proposal to deposit excavated sandwave material within the area of pre-sweeping, keeping sediment the same in the sediment cell. This is welcomed. However, this measure has not been secured as a commitment in a named plan/document.	Issue progressed. We welcome the Applicant's proposal. However, we advise that the proposed mitigation measure should be secured. Furthermore, the wording needs to be more specific, for example, cleared material should remain within the system and be 'intelligently' placed so that excavated material quickly infills the excavated depression.
6	1.9.21	Natural England notes that the Applicant states that the engineering assessment has provided a high level of confidence that the ground conditions for the Proposed Project are sufficient to lower the cable along the entire cable route (with the exception of cable crossings). We welcome this assurance. However, the Applicant retains an	We welcome the Applicant's assurance that successful cable burial will be achieved along the entire cable route (with the exception of cable crossings). However, the WCS external cable protection and impact assessment do not align with

		allowance for rock backfill and (82km) remedial rock protection where Target Depth of Lowering (TDOL) cannot be achieved. In addition, the impact assessment considers impacts on Cross Ledge and Goodwin Sands MCZ due to the presence of cable protection measures. This would suggest that there is uncertainty regarding cable burial success along the entire cable route (with the exception of crossings).	this assertion. Based on the Applicant's confidence in achieving successful cable burial along the entire cable route, we advise that the WCS and impact assessment should be updated accordingly to reflect this reduced requirement for external cable protection. And commitments made to avoid cable protection (other than at crossing points) along the cable route which runs parallel to Goodwin Sands MCZ.
7	1.9.23-1.9.25	Natural England welcomes consideration of the potential use of temporary protective matting on the mudflats at Pegwell Bay during construction. However, we note that the scale and nature of this has not been discussed or quantified. Furthermore, we are aware that on certain terrains, bog mats can become stuck, which makes them difficult to pull out, leading to damage to the intertidal habitat, especially where heavy equipment is not distributed evenly.	Issue progressed. We advise that the potential impact of placing protective matting on the mudflats at Pegwell Bay should be fully considered and quantified, as appropriate. Natural England also advises that the selected protective matting should be suitable for the receiving environment and conditions. Scheduling works during drier conditions may also help to reduce impacts on the intertidal mud/sandflats.
8	1.9.29-1.9.35	Natural England welcomes the additional consideration of potential impacts on the nearshore seabed morphology and saltmarsh at Pegwell Bay due to the presence of cofferdams during construction. We note the model results and assessment conclusions suggest that there may be temporary wave blockage impacts on the saltmarsh (edge), but are considered unlikely to cause a negative effect on the saltmarsh.	We advise that the proposed Kent landfall monitoring should include a commitment to validate ES predictions regarding impacts on the nearshore and saltmarsh due to the presence of cofferdams. If appropriate monitoring and where required remedial actions for significant habitat changes observed can be secured, then we will likely consider this issue resolved.
9	1.9.57-1.9.59 & Figure 6.4.4.1.17	Natural England is grateful to the Applicant for providing the additional map showing the position of the Offshore Scheme relative to the Aldeburgh Napes and Aldeburgh Ridge. We also welcome the increased sensitivity rating from low to high for the Aldeburgh Napes. However, the extent to which the Offshore Scheme overlaps with the Aldeburgh Napes (JNCC Annex I sandbank), and the magnitude of the impact, remain unclear.	We advise that the extent to which the Aldeburgh Napes may be affected by cable installation and external cable protection placement needs to be clarified.

10	1.9.107-1.9.122 & Figure 6.4.4.1.16	Natural England remains concerned that cable protection measures placed adjacent to Goodwin Sands MCZ could interrupt seabed sediment transport, leading to impacts on seabed morphology in the MCZ. The Applicant considers that there is "*a high level of confidence that the ground conditions adjacent to the Goodwin Sands MCZ are sufficient to achieve target depth of lowering*.". The Applicant also states that "*it is expected that there will be no requirements for any additional rock protection to be installed adjacent to the Goodwin Sands MCZ*." While, this assurance is welcomed; evidence is limited and commitments have not been secured in the form of a condition or commitment that would not allow placement of rock protection along the 3.2km section of Offshore Scheme adjacent to the MCZ.	No change. We advise that if the Applicant can secure a condition whereby no cable protection berms (excluding cable crossings) will be permitted to be constructed or maintained within/adjacent to Goodwin Sands MCZ, then we will likely consider this issue resolved.
11	1.9.123-1.9.124	Natural England welcomes the additional consideration of bedform orientation and the bedload transport direction at Cross Ledge Sandbank. However, as advised previously, the evidence presented is not sufficient to support the EIA conclusions regarding the nature, scale, and extent of both construction-related and operational impacts on Cross Ledge Sandbank. Sufficient information is also lacking regarding baseline conditions and sensitivity of Cross Ledge.	We advise that further information is needed to increase understanding of baseline conditions, receptor sensitivity, and the nature, scale, and extent of impacts. Regarding operational impacts, as advised above, based on the high level of confidence, the Applicant should commit to a condition whereby no cable protection berms and/or cable crossings will be permitted to be constructed or maintained within/adjacent to Cross Ledge.
12	1.9.125-1.9.126 & Figure 6.4.4.1.17	Natural England welcomes the discussion on the morphological trends of Aldeburgh Napes and North Farland Crossing. However, it remains unclear whether the North Farland Crossing overlaps or is in close proximity to Aldeburgh Napes. Furthermore, the WCS scale and extent of cable protection measure placement on/near Aldeburgh Napes also remains unclear.	We advise that clarification is needed regarding any overlap between Aldeburgh Napes and the North Farland Crossing, and also the requirement for cable protection on/adjacent to Aldeburgh Napes.

Table 2: Natural England's Advice on Physical Processes [REP6-017].

Document reviewed: [REP6-017] 6.11 Marine Conservation Zone Assessment (Tracked)			
NE Ref	**Section**	**Key Concern and/or Update**	**Natural England's Advice to Resolve Issue**
1	1.5.29	Natural England notes that the Applicant considers that sediment dispersal will not impact features of the MCZ	Please see advice included Table 3 and update the MCZ assessment accordingly.
2	1.5.31 1.7.22- 1.7.24	Natural England notes and welcomes the Applicant's latest updates on O&M phase loss of benthic habitats and species due to the placement of rock protection in the vicinity of Goodwin Sands MCZ. However, as discussed in the table above, there is no indicative layout of potential cable protection locations along the cable route. rock protection placement directly adjacent to the MCZ cannot be ruled out. Therefore, our concerns remain regarding potential for impacts to sediment transport processes affecting, in turn, seabed morphology and sediment composition in the MCZ due to the placement of up to 3.2km of cable protection measures along the MCZ boundary.	We note the Applicant's high level of confidence that '*the ground conditions adjacent to Goodwin Sands MCZ are sufficient to lower the cable'*, and advise that if the Applicant can commit to not placing external cable protection adjacent to the MCZ then this will address our concerns regarding interruption of sediment transport pathways and morphological/sedimentary change of MCZ features.
3	1.5.35- 1.5.42	Natural England welcomes the additional consideration of impacts on Goodwin Sands MCZ due to the placement of cable protection measures adjacent to the MCZ. However, this does not address our concerns regarding potential interruption of sediment transport processes/pathways through the operational lifetime of the Proposed Project. Potential changes to the processes that drive sediment transport along the (up to 3.2km of) MCZ boundary have not been adequately assessed in terms of the specific environmental conditions and WCS cable protection parameters (e.g. 1m high rock berms along a 3.2km section of cable route).	Natural England advises that a more detailed assessment is needed to increase understanding of the potential impact on MCZ morphology due to changes in the sediment transport processes and pathways operating on and around the MCZ boundary resulting from the WCS placement of cable protection adjacent to the MCZ.

Table 3: Natural England's Advice on Physical Processes [REP6-120].

Document reviewed: [REP6-120] 9.144 Additional Sediment Dispersion Modelling - Technical Note			
NE Ref	**Section**	**Key Concern and/or Update**	**Natural England's Advice to Resolve Issue**
1	Section 2.2	Natural England welcomes the additional sediment dispersion modelling carried out by the Applicant, in particular for Pegwell Bay, Kent, which informs the impact assessment.	N/A
2	Section 2.2.12 & Plate 2.6	Natural England notes the anomaly identified at Point 3 in the lower intertidal [REP6-120] which has been attributed to the non-uniform distribution of peak currents during the flood phase of the tide. Peak current speeds were also found to be higher at this location, exceeding the threshold for mobilising fine sand. This anomaly may be indicative of an erosional potential due to, for example, specific flow conditions, interaction between fluvial and/or tidal flows, or complex seabed bathymetry.	We advise that the anomaly identified in the additional Pegwell Bay modelling should be further investigated to inform the cable burial risk assessment and impact assessment. But recognise that this is likely to be consider as part of post consent/pre-construction phase and therefore if this commitment to investigate and consult with MMO and NE on as part of the CBRA then Natural England would consider this issue resolved.
3	Section 2.3	Natural England welcomes the additional modelling of cofferdam blockage effects at Pegwell Bay. We note that the modelling shows that the increase in current speed due to the presence of a cofferdam is not sufficient to cause erosion of saltmarsh sediments, which is welcomed. However, we advise that monitoring should be undertaken to support the EIA conclusions and demonstrate that there are no unexpected changes to the saltmarsh sediments.	We welcome assurance that the presence of the cofferdams during construction at the Kent landfall will not cause erosion of saltmarsh sediments. However, we advise that the model assessment conclusions should be verified through monitoring. Therefore, we advise that the proposed Kent landfall monitoring should include a commitment to validate ES predictions regarding impacts on the nearshore and saltmarsh due to the presence of cofferdams. If appropriate monitoring can be secured, then we will likely consider this issue resolved.
4	Section 3.2	Natural England notes that trends in deposition associated with sediment disturbance at Pegwell Bay are discussed, but not maximum deposition values for the four release points across the intertidal. However, Plate 2.8 shows a continuous trend of increasing deposition thickness across the intertidal with distance from the saltmarsh, over the 7-day period modelled. For example,	We advise that the WCS parameters should be provided for construction-related changes in intertidal mud/sandflat morphology and elevation due to sediment deposition (i.e. deposition thickness, extent, and persistence) before

		max sediment deposition occurs at Point 1 (90mm), Point 2 (65mm), Point 3 (20mm), and Point 4 (10mm). Although model results in Plate 2.7, appear to show a sediment deposition thickness of >100mm at Point 1 closest to the saltmarsh edge, reducing across the intertidal to 10-20mm at the lowest point, Point 4. The new model results inform understanding of the WCS sediment deposition thickness due to construction-related activities at Pegwell Bay, although, it is not stated if this represents the overall WCS for any overlapping, additive, cable installation activities. The overall WCS sediment deposition parameters, footprint, thickness and persistence have not been derived, based on the model output for discrete points across the intertidal. However, this would increase understanding of the WCS changes to intertidal mud/sandflat morphology and elevation.	we can advise further on the significance of the impacts.

Table 4: Natural England's Advice on Physical Processes [REP6-119].

Document reviewed: [REP6-119] 9.143 (A) Pegwell Bay Saltmarsh Limits Topographic Survey March 2026			
NE Ref	**Section**	**Key Concern and/or Update**	**Natural England's Advice to Resolve Issue**
1	Figure 3	Natural England welcomes the latest (March 2026) saltmarsh limit topographic survey carried out on behalf of the Applicant. The latest delineation of the saltmarsh edge at the Kent landfall (Figure 3) shows that the saltmarsh edge is in close proximity to, or potentially overlapping with, the Pegwell HDDs and Exit Areas (Figure 9.13.1 in REP6-105]. This affects the commitment in the REAC [REP6-135], to maintain a minimum distance of 105 m between the seaward edge of the saltmarsh and the HDD exit pits and a minimum distance of 50 m between the seaward edge of the saltmarsh and the temporary HDD working area. We are concerned that there may be impacts on the prograding saltmarsh either during the construction, or later phases of the Proposed Project, if the setback distance or buffer is not sufficient.	We advise that the latest saltmarsh limit topographic survey information should be used to establish a suitable buffer between the seaward edge of the saltmarsh and the HDD exit pits and temporary working area. The commitment should be updated accordingly.

Table 5: Natural England's Advice on Physical Processes [REP6-105].

Document reviewed: [REP6-105] 9.13 (D) Pegwell Bay Construction Method Technical Note (Tracked)			
NE Ref	**Section**	**Key Concern and/or Update**	**Natural England's Advice to Resolve Issue**
1	1.2.7	Natural England notes the many changes to the Landfall Construction Process where offshore aspects have been replaced with foreshore elements, for example, the bore drilled from onshore to foreshore (instead of offshore), the marine cable will be pulled through the trenchless crossing ducts from foreshore to onshore (instead of offshore to onshore), the cofferdam barge will be refloated and repositioned nearshore (instead of offshore), etc. However, it is unclear whether these changes alter the WCS impacts to the intertidal mudflat/sandflat morphology.	Please can the Applicant clarify if the changes made to the Landfall Construction Process alter the WCS impacts to the intertidal mudflat/sandflat morphology?

Table 6: Natural England's Advice on Physical Processes [REP6-135].

Document reviewed: [REP6-135] 9.84 (D) Register of Environmental Actions and Commitments (REAC) (Tracked)			
NE Ref	**Section**	**Key Concern and/or Update**	**Natural England's Advice to Resolve Issue**
1	MPE06	As advised above, we do not agree with the wording in MPE06 regarding landfall monitoring only '*where rock bags are planned to be placed at the Horizontal Directional Drilling (HDD) exit pits'*.	We advise that landfall monitoring should cover the full extent of the nearshore and intertidal at both landfalls. Monitoring should cover vertical elevation change (across the beach at the Suffolk landfall, and upper to lower intertidal/shallow subtidal at the Kent landfall), and coastal retreat. In addition, the Kent landfall monitoring should encompass access routes between the hoverport and HDD working area, and the River Stour channel.
2	W37	Natural England welcomes a commitment to prepare a hoverport condition monitoring plan post consent to monitor the condition of the hoverport during construction, including measures for identifying and managing any potential contamination risk. However, we consider that monitoring of the hoverport condition during construction phase may be too late to prevent potential leaching of contaminants into the intertidal	We continue to advise that it will be important to understand the hoverport condition, potential pollution risk, and nature/toxicity of potential contaminants ahead of construction.

		and coastal waters. And that remediation to contain contaminants are likely to be damaging in their own right.	

Table 7: Natural England's Advice on Physical Processes [REP6-116].

Document reviewed: [REP6-116] 9.140 Outline In-Principle Monitoring Plan			
NE Ref	**Section**	**Key Concern and/or Update**	**Natural England's Advice to Resolve Issue**
1	3.3.1-3.3.3	Natural England welcomes the proposed In Principle Monitoring Plan (IPMP) for the Marine Physical Environment. However, additional information and more specific details are required. For example, it is important for the monitoring to allow validation of assessments made within the ES in terms of changes in seabed level, sediment transport regime, seabed morphology, including scour.	Natural England advises that more specific details are needed in terms of the nature of the proposed pre- and post-construction monitoring, rationale, receptors, impact/pathway, deliverables, regulatory authority, review period etc. We refer the Applicant to Natural England's standard advice on IPMP at Appendix L7 to our Deadline 7 submission.
2	3.3.4	Natural England notes and welcome the proposal to undertake pre-construction monitoring for the area within the DCO Order Limits where construction works will be carried out. We also note that this will include the extent of the Coralline Crag within the Order Limits at Suffolk. This is also welcomed; however, this has not been captured in the REAC or other relevant plans/documents.	We advise that for consistency, all monitoring commitments should be aligned across relevant plans/documents. Monitoring of the Coralline Crag should be included in the commitment. We also advise that monitoring at Pegwell Bay should commence as soon as possible following consent to inform the baseline assessment of the River Stour channel and continue the saltmarsh limit surveying.
3	3.3.6	Natural England advises that the Kent and Suffolk landfalls are sensitive, or erosion prone coastlines, where there is currently considerable uncertainty regarding the nature and scale of the impact predicted. Therefore, we support the proposed monitoring at both Kent and Suffolk landfalls.	We advise that landfall monitoring should cover the full extent of the nearshore and intertidal at both landfalls. Monitoring should cover vertical elevation change (across the beach at the Suffolk landfall, and upper to lower intertidal/shallow subtidal at the Kent landfall), and also coastal retreat at both landfalls. We also advise that the proposed Kent landfall monitoring should include a commitment to validate ES predictions regarding impacts on the nearshore and saltmarsh due to the presence of cofferdams, the construction access

			routes between the hoverport and HDD working area and monitor migration of the the River Stour channel. And should impacts be found to be greater than predicted then remedial action should be taken In addition, we advise that the Suffolk landfall monitoring should cover the extent of the Coralline Crag within the Order Limits at Suffolk. Consideration should also be given to timing/seasonality of surveys to capture calm/storm shoreline responses.
4	3.3.7-3.3.11	Natural England is concerned that there may be potentially long-lasting impacts to the intertidal area in Pegwell Bay which is an important component of internationally and nationally designated sites. We are also concerned that uncertainties remain regarding the future morphological evolution of the River Stour channel and migration towards the cable route.	Natural England would also wish to be consulted on the proposed pre- and post-construction monitoring of Pegwell Bay, including identification of appropriate thresholds of change and any remedial action required.
5	3.3.	There is the potential for both construction (e.g. pre-sweeping) and operational (e.g. due to presence of cable protection) sedimentary and morphological impacts on sandbank (e.g. Aldeburgh Napes, Cross Ledge) and sandwave fields (e.g. adjacent to Goodwin Sands MCZ). Therefore, we advise that it is important to undertake monitoring of affected sandbank/ sandwave features to ensure there are no unexpected changes, to validate the conclusions of the EIA/MCZA, and to provide evidence of sandwave recovery. (Note our comments above regarding the need for clarification on the WCS pre-	We advise that pre- and post-construction monitoring should be carried out to ensure that there are no unanticipated impacts on sandwave/sandbank systems (e.g. Aldeburgh Napes, Cross Ledge Sandbanks/sandbanks at Pegwell Bay approaches, and Goodwin Sands MCZ) due to pre-sweeping/sandwave lowering and/or the presence of cable protection measures. Monitoring evidence should be provided for those areas affected by pre-sweeping/sandwave lowering and cable protection measures to validate conclusions in the EIA/MCZA. We also advise that monitoring should be undertaken to demonstrate sandwave recovery. (Note that the WCS pre-sweeping/sandwave lowering locations and parameters need to be clarified first in order to inform monitoring requirements).

		sweeping/sandwave lowering locations and parameters).	

Table 8: Natural England's Advice on Physical Processes [REP6-137].

Document reviewed: [REP6-137] 9.92 (C) Outline Cable Specification and Installation Plan (Tracked)			
NE Ref	**Section**	**Key Concern and/or Update**	**Natural England's Advice to Resolve Issue**
1	8.2.3 & 8.3 & [REP6-005]	Natural England understands that 75,000m^3 pre-sweeping material may be removed from the Sunk Pilot Boarding Area and disposed of anywhere within the cable corridor disposal site, noting that any material extracted from the seabed during planned construction activities will not be disposed of within the three Areas of Safeguarded Water Depth. We are concerned that the disposal of this material may adversely affect sensitive seabed areas/benthic habitats (for example, through smothering and/or contamination).	Natural England advises that the fate of sediment dredged from the Sunk Pilot Boarding Area needs to be appropriately considered and assessed in the relevant documents. We would also advise that an appropriate buffer should be applied to avoid disposal of this dredged material in proximity to sensitive seabed/benthic habitats. This should all be secured as part of a commitment within this plan.