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BY EMAIL ONLY

Dear Sirs

Natural England have provided comments on the following documents at Deadline 3:

- Saltmarsh Mitigation, Reinstatement and Monitoring Plan (SMRMP) (Revision B)
- MCZ Assessment Clarification Note
- Review of the Environment Statement Following the Removal of the Option 2 Landfall Design
- Draft Site Integrity Plan
- RIAA (Revision B) Comments
- Biogenic Reef Mitigation Plan - Revision B – Additional Observations at Deadline 3
- Appendix 1 - Annex A and Annex B of Deadline 1 Submission – Offshore Project Description Assessed in the Environmental Statement and Project Description Transcription into the Application
- DCO (Revision B)

1. Saltmarsh Mitigation, Reinstatement and Monitoring Plan (SMRMP) (Revision B)

- 1.1. Please find below Natural England's comments regarding revision B of the SMRMP. Overall Natural England are satisfied with the changes made to the document following the removal of landfall option 2. We have made comments regarding clarifications as well as providing advice to ensure the plan is as robust as possible. Once these have been discussed and addressed we envisage the plan can be finalised and agreed within the Statement of Common Ground (SoCG).
- 1.2. It should also be noted that following joint discussions with the Environment Agency (EA) they agree and support the comments we have submitted below. An email confirming this position by the EA has been attached as part of Deadline 3.

Table 1. Natural England's Comments on the Saltmarsh Mitigation, Reinstatement and Monitoring Plan – Revision B.

Saltmarsh Mitigation, Reinstatement and Monitoring Plan – Revision B		
Point	Section	Comment
1.	Figure 2-4.	Will the whole 5m separation distance be used by transiting vehicles, and thus be disturbed? Alternatively, will a suitable track be laid within that 5m area?

2.	2.3.4 – Footnote 2	To confirm and clarify with the applicant, will all the cofferdams seaward of the seawall i.e. within the Saltmarsh and the designated site boundaries be removed? They should be removed in order for the effects to be considered temporary.
3.	Work Site Establishment	How will the relevant machinery gain access to the saltmarsh?
4.	Trench Excavation	<p>It states in bullet point two that “excavated material will be placed to one side for re-use.” Is there a specified location for where this material will be placed? It would be counter intuitive to place it on undisturbed saltmarsh and smother the vegetation as it is a further area that will be temporarily damaged. However, to avoid additional transiting up and down the work area to store the material landward of the saltmarsh a suitable membrane should be laid and the material stored on top. This should take place in the work area and every effort should be made to reduce the overall area where material is stored. Furthermore, we query where and how the excavated material from the cofferdam is likely to be stored?</p> <p>Once each cable has been placed within the trench, the trench should not be kept open and be closed as soon as possible. The topography should be maintained and monitored to ensure there is no deviation from the baseline as may have occurred at Nemo.</p> <p>Why is the spider plough only being considered further down the shore currently? Was it not used for the whole of the original Thanet Cable? From our understanding the simultaneous trench and rebury provided by the spider plough really aided in the recovery of the saltmarsh in this area.</p> <p>Natural England understand that the current layout as described in Figure 2 is considered the worst case scenario. However, we would want the envelope to be refined further to minimise the impact as soon as possible and an indication from the applicant whether four cables is the final number to be installed. Natural England advise that the number of cables and trenches should be as low as possible.</p>
5.	4.1.3	As mentioned previously, saltmarsh recovery was good for the original Thanet project but is currently not very successful for the Nemo cable, so recovery cannot be assumed. It is important to have a robust ECOW implementing any agreed plans and ensuring the contractors understand why and how they need to work carefully in such a sensitive area. A regular catch up call with the applicant, the ECOW and the EA during the construction phase would be useful to ensure the mitigation plan is being adhered to and to inform us of the progress that is being made. A regular catch up call has worked well with other applicants.
6.	Table 4 – Pollution Prevention	<p>What is the definition of the work area? Is this outside of the Red Line Boundary (RLB) or within the construction compound, which we understand is situated within the country park?</p> <p>Furthermore, what will happen to the spoil cleaned off tyres / tracks, as they could act as a potential vector for INNS. As stated in section 5.9.3 of the CoCP “Any wastewater is either treated to an appropriate standard for discharge or otherwise removed from site.” Would this spoil waste water be likely to be taken off site in this case? It may be more appropriate to</p>

		ensure that vehicles are clean before arriving at site.
7.	Table 4 - Ecology	The location, orientation and time of year of any photos should be the same as those taken pre-construction to ensure a good comparison, as mentioned the use of GPS should aid this. There should also be photos taken at control sites and also in relation to the topography. Photos at additional locations should be taken if there is anything particular to note.
8.	Table 4- Transport and Access	Natural England recognise this is relatively high level currently, however as further construction details become apparent we would like to feed into and agree the finer details of this aspect of the plan such as speed limits and final access routes.
9.	6.1.1. - 6.1.5.	<p>The use of a Before After Control Impact Design (BACI) is advised whilst utilising NVC classification for botanical habitat types along the transect. The applicant needs to ensure there are monitoring points in each habitat / zonation (lower, mid and upper marsh) of the saltmarsh which may mean further quadrats are required. There is no mention of a control site / transect but this should be introduced to effectively compare areas – this could be solved by introducing a BACI approach as described above. Vegetation height and any species of conservation importance should also be noted, particularly the suitability of habitat for Ramsar invertebrates.</p> <p>The introduction of one or two continuous belt transect that run parallel to the cable trench/corridor would also be useful. It would provide a full range and characterisation of the saltmarsh along the impacted area and would not require much additional work. Due to the current experience with Nemo and the sensitivity of the site, Natural England feel this is a reasonable precaution to help inform the successful recovery.</p>
10.	7.1.1.	Surveys at years 2 to 5 should occur at the same time of year to ensure an accurate comparison between surveys.

2. MCZ Assessment Clarification Note

2.1. It is clear to see the applicant has taken on board many of Natural England's suggestions regarding the MCZ assessment, such as using the Thanet Coast MCZ conservation objectives as a proxy and utilising Natural England's Advice on Operations. However, Natural England still has some outstanding concerns with regard to the characterisation of the area of the pMCZ associated with the red line boundary, the suitability and lack of pre and post construction monitoring and the effects of associated works within the pMCZ itself. Further detail is provided in the sections below, with detailed comments on the document itself in table 2.

2.2. Characterisation of the pMCZ

2.2.1. It is currently Natural England's position that there is uncertainty with regards the adequacy of the MCZ characterisation data to be completely confident in the habitats within the area of the Goodwin Sands pMCZ. Characterisation should provide a broad coverage of the habitat types within the project area of interest, but particularly within any nature conservation designations that are intended to protect seabed features or where sensitive habitats and species may occur outside of designated sites. We acknowledge that the applicant has undertaken geophysical surveys across the Red Line Boundary (RLB) and inside Goodwin Sands pMCZ. However, considering the applicant's assessment that sandwave clearance and rock protection will likely take place in some capacity, within a proposed designated site which is now a material

consideration, we need further data and assessment to provide a better understanding of both the physical and biological environment in the proposed development's zone of impact and the effects upon the features and conservation objectives of the site.

2.3. Pre and Post Construction Monitoring within the pMCZ

2.3.1. Natural England are in agreement with the applicant that monitoring should be targeted for this project. However, Natural England do not currently deem the pre and post construction monitoring commitments within the pMCZ to be sufficient. Natural England advise that further pre construction surveys are required as well as commitments to post construction monitoring, which should be used together to minimise and validate impact predictions.

2.3.2. We acknowledge and welcome that the applicant has recognised this in terms of biogenic reef, and is carrying out a pre and post-construction geophysical survey with additional ground truthed data where necessary to successfully microsite around these areas and monitor the impact.

2.4. Further work required – sandwave clearance, dredging and disposal

2.4.1. Sandwave clearance, dredging and disposal is proposed to occur within the pMCZ. Natural England believes that further evidence needs to be provided on these activities as the information presented is too broad to provide site specific advice on.

2.4.2. Disposal is described and assessed as occurring across the whole of the cable corridor. Natural England therefore assumes that the assessment of impacts is based on an even distribution of disposal occurring across the cable corridor. Natural England is concerned that this does not represent a realistic worst case scenario of impacts.

2.4.3. From experience of other windfarms and cable activities, disposal is more likely to occur at discrete locations, and therefore plumes and deposition at and from these locations are likely to be bigger than what has been assessed as the worst case scenario. A realistic assessment of impacts arising from the worst case scenario within the MCZ is required.

2.4.4. Further pre-construction ground truthed surveys are also required to further refine the scale and need for such activities within the site, and to ensure activity is in line with that outlined within the MCZ assessment. Post construction monitoring is required in order to validate predictions regarding impacts and ensure that recovery is occurring.

2.4.5. Natural England would like material that is removed from the pMCZ i.e. through sandwave clearance to be deposited as close as possible to where it is dredged so it is retained within the overall system. Similarly, sediment should be deposited in areas where similar grain sizes are displayed to avoid altering the receiving environments benthic composition.

2.4.6. As discussed in a recent telecall with the applicant a sandwave clearance plan could be conditioned within the DCO to ensure these discussions are continued post consent.

2.4.7. The MCZ assessment states that recovery of biological communities will take place after disturbing activities, and that unimpacted habitat will aid this. The current licence for Dover Harbour Board to extract aggregates from the site will result in an area of subtidal sand being in an impacted state for some time once extraction has ceased. Therefore, the area of impacted

habitat from both this application and the aggregate site should be considered in combination to ensure that recovery of both areas is still likely.

2.4.8. Additionally, some dredging disposal activities associated with Ramsgate Port are licenced. There has been some assessment of this activity on suspended sediments within the physical processes chapter of the ES. More clarity though should be provided to explain why the impacts are deemed small scale, and how this relates to designated sites such as the pMCZ.

2.5. Further points associated with the proposed works

2.5.1. Natural England acknowledge that the applicant has considered a worst case scenario for rock protection. This loss should be fully assessed in terms of the significance of the loss in its own right (i.e. percentage loss), as well as the functional importance of that loss to the overall feature and the site as a whole. Therefore, taking the Thanet Coast MCZ conservation advice package as a proxy, we advise that this assessment should consider how a range of attributes associated with subtidal sediments may be affected (and not just the percentage loss which has so far been presented) including: Structure: species composition of component communities; Distribution: presence and spatial distribution of biological communities; Supporting processes: energy / exposure; Supporting processes: sediment movement and hydrodynamic regime. Monitoring associated with any use of rock protection/habitat loss should then take place to validate predictions made within assessments.

2.5.2. Natural England also advises that a realistic approach to cable protection resulting in habitat loss should be taken, rather than applying to cover the entirety of the cable corridor within the site. Pre-construction surveys and ground truthing can also be used to help ensure that adequate burial is achieved, avoiding the need for future rock protection.

Table 2. Natural England’s Comments on the MCZ Assessment Clarification Note submitted at Deadline 2.

MCZ Assessment Clarification Note		
Point	Section	Comment
1.	11	Considering the ephemeral nature of <i>Sabellaria</i> and the fact data was collected in 2014 for the MCZ characterisation data, by the time construction is due to take place this feature could have colonised this area. The biogenic reef plan and pre-construction surveys with the potential for ground truthing, if this feature is identified, would further the understanding of the cabling area. However, these ground truthed points for biogenic reef to be replicated post construction to determine any impacts.
2.	17	Disposal events need to be more specific in relation to the MCZ.
3.	Table 2	Although not highlighted as a “High-Medium” risk, the pressure “Habitat structure changes-removal of substratum (extraction)” is still highly relevant to the cable activities within the pMCZ especially if sandwave clearance is to take place. Querying the Advice on operations for the Thanet Coast MCZ all features related to Goodwins Sands pMCZ features are sensitive to this pressure.

4.	22	Why does this paragraph relate to direct habitat loss instead of temporary habitat loss as highlighted within the title?
5.	31	This section should clearly state what the anticipated levels of smothering in the pMCZ on the relevant habitats are. There could be the potential for heavy smothering due to deposition from sandwave clearance.
6.	32	As highlighted above, dredged material should be deposited on material of the same sediment grain size to avoid loss of extent.
7.	33	If there is going to be long term habitat loss due to the presence of cable protection we require site specific information to assess the significance of this loss in the pMCZ. This also raises the need for sufficient cable burial to occur to avoid this loss in the first instance, which could be ensured by further site specific surveys at the pre-construction stage.
8.	33	The assumption by the applicant is that 100 % of the cable within the pMCZ will require additional cable protection. Although we appreciate this is a conservative estimate, Natural England advise that due to the pressure of habitat modification / loss, the amount of rock protection should be kept to a minimum.
9.	33	This percentage loss is not necessarily considered an insignificant amount and could have the potential to hinder the conservation objectives.
10.	34	We request a copy of the Thanet OWF monitoring report with regard to the infilling of the rock protection.
11.	35	Natural England disagree with the overall conclusions as stated in this paragraph. Although the overall extent is relatively small, it still represents a loss of a feature for which the site is designated for. Therefore, it needs to be refined, as well as an assessment of the functional importance of the lost habitat, using attributes from Natural England's conservation advice.
12.	40	With regards to bullet point 2, if the WCS of 100 % cable protection is utilised within the site, the extent of the feature will be affected and will not be stable.

3. Review of the Environment Statement Following the Removal of the Option 2 Landfall Design

- 3.1. Following a review of the above document, Natural England agree with applicant's conclusions that the removal of landfall Option 2 (the permanent loss of saltmarsh) from the project design envelope, will not result in any additional or greater effects than those already considered within the current Environmental Statement.
- 3.2. As previously stated, one of Natural England's major concerns was associated with landfall option 2 and the permanent loss of saltmarsh. As a result of its removal and the addition of a Saltmarsh Mitigation, Reinstatement and Monitoring Plan (SMRMP) our concerns relating to the effects upon the saltmarsh in this area have been reduced significantly. In Natural England's opinion, Option 3 (trenching) is now considered the worst case scenario.

4. Draft Site Integrity Plan (SIP)

- 4.1. Overall, Natural England has no major issues with the draft SIP, however we have provided further comments below.
- 4.2. Natural England would find it helpful if a timeline could be included to better illustrate the timing of the events in paragraph 3. Whilst we note figure 2, a diagram or figure detailing the 'months before construction' would add clarity to the sequence of events and allow a clearer understanding of the timetable for the events in paragraph 3 and the timings detailed in the Final Design Parameters (table 1) and how they align.
- 4.3. There is still no overarching mechanism to manage and successfully implement the various SIPs that will be produced from other offshore windfarm projects. This needs to be determined as soon as possible to allow the SIPs to be successful in achieving the required mitigation measures. As per Natural England's previous advice, a mechanism needs to be developed by the regulators to ensure continuing adherence to the SNCB thresholds over time. Multiple SIPs will be developed, piling can take place over several years, and new projects can come online during this time. Should potential exceedance of the thresholds occur, a process for dealing with this issue needs to be in place – the affected developers / industries will need to work together with the regulator and SNCBs to prevent adverse effect on the SCI. Until the mechanism by which the SIPs will be managed, monitored and reviewed is developed, Natural England are unable to advise that this approach is sufficient to address the in-combination impacts and therefore the risk of Adverse Effect on Integrity on the Southern North Sea SCI cannot be fully ruled out.
- 4.4. Natural England welcomes the commitment from Thanet Extension not to undertake geophysical works until it can be confirmed that those works in-combination with works at East Anglia ONE will not exceed the thresholds.
- 4.5. Natural England is aware of a large-scale seismic survey being planned for 2019, although we are not clear what the details or extent of this survey are or whether there is any overlap with the winter part of the SNS SCI. MMO should seek clarification on this from BEIS Oil and Gas along with whether any further surveys are planned for 2019.
- 4.6. With regards to table 1 and the geophysical survey row, it states that surveys have been assessed as occurring in the 2018/19 winter season. Natural England are assuming these surveys have not been undertaken and if not shouldn't the timing be refined further?
- 4.7. Natural England believe considering the uncertainty around the mechanism for managing the various SIPs from other projects, submitting the SIP four months prior to the first noisy event is too late and should be provided earlier.

5. RIAA (Revision B) Comments

5.1. See comment below in table 3.

Table 3. Natural England’s Comments on the RIAA (Revision B) submitted at Deadline 2.

RIAA (Revision B)		
Point	Section	Comment
1.	Tables 12.2	Natural England welcomes the removal of EA1, Hornsea 3 and Norfolk Vanguard from the group of projects deemed to have no temporal overlap with Thanet Extension. We disagree that there is no potential for temporal overlap between Thanet Extension and Norfolk Vanguard. If Vanguard are due to begin construction in 2024 then it stands to reason that they will be undertaking pre-construction ‘noisy’ activities, such as geophysical surveys or UXO detonation in 2023, which overlaps with the 2021-2023 construction window for Thanet Extension. However, we understand that there is no information available regarding the schedule of works at Vanguard at this time.
2.	Tables 12.4 and 12.5	<p>Natural England welcomes the inclusion of Tier 2 projects in the in-combination assessment and the associated figures presented in tables 12.4 and 12.5. These figures clearly demonstrate that under the worst case scenario the SNCB thresholds are exceeded considerably. Natural England is satisfied that these figures represented an unlikely worst-case scenario and the assessment will be revisited through the Site Integrity Plan (SIP) and any further mitigation that is required will be implemented prior to construction commencing at Thanet Extension.</p> <p>As per Natural England’s previous advice, a mechanism needs to be developed by the regulators to ensure continuing adherence to the SNCB thresholds over time. Multiple SIPs will be developed, piling can take place over several years, and new projects can come online during this time. Should potential exceedance of the thresholds occur, a process for dealing with this issue needs to be in place – the affected developers / industries will need to work together with the regulator and SNCBs to prevent adverse effect on the SCI.</p> <p>Until the mechanism by which the SIPs will be managed, monitored and reviewed is developed, Natural England are unable to advise that this approach is sufficient to address the in-combination impacts and therefore the risk of Adverse Effect on Integrity on the Southern North Sea SCI cannot be fully ruled out.</p>
3.	Onshore Biodiversity 7.5.22 – 7.5.37	Following the removal of option 2 this section has been appropriately updated. Natural England agree with the updated conclusions presented and the remaining effects screened in for LSE in relation to onshore biodiversity. As highlighted within the Project Description, Site Selection and Alternatives SoCG submitted by the applicant at Deadline 3, Natural England agree there will be no AEol upon the Thanet Coast and Sandwich Bay SPA and Ramsar alone or in-combination, providing the SMRMP is updated appropriately and the embedded mitigation proposed is implemented successfully.

4.	Onshore Biodiversity 11.5	Natural England are content with the changes made to this section. Natural England welcome the updates regarding the Terrestrial Invertebrate Mitigation Strategy (TIMS) and the inclusion of the accidental pollution text.
5.	Onshore Biodiversity 12.5	Natural England are also content with the changes regarding this section. Regarding the Manston Airport development, although any in combination effects will be during construction and outside of the sensitive bird overwintering period, we ask the applicant to keep up to date with the progress of this application and any changes which may affect the Thanet Extension project.
6.	Table 7.3 - Subtidal and Intertidal Benthic Habitats	Thanet Coast SAC – Chalk Reefs – It states “Where possible, the cable route will be microsited to avoid features present.” The cable route now fully avoids all chalk reef features of the SAC and so this may need to be amended.
7.	11.2.20 - Subtidal and Intertidal Benthic Habitats	Although the original TOWF cable has recovered well it should state alongside this that the Nemo cable installation still represents an area still in an impacted state.
8.	12.2.1 - Subtidal and Intertidal Benthic Habitats	<p>Although screened out of the RIAA, the physical processes chapter of the ES does refer to the disposal site used by Ramsgate Harbour. This disposal site does have a long term licence and therefore a reasonable estimate of disposal activity can be made.</p> <p>The ES does consider the in combination effect of plumes arising from the disposal site and this application, and concludes that the effect is small. More clarity is sought about that conclusion and how that relates to designated sites. It is not anticipated that this will materially affect the outcome of assessments.</p>
9.	12.2.1 - Subtidal and Intertidal Benthic Habitats	<p>As per our previous comments, Natural England advises that further consideration needs to be given to impacts, sensitivity and recoverability of habitats to deposition of material from sandwave clearance / disposal including the habitat and size of area affected. Disposal areas should avoid protected sites and areas of habitats of conservation interest.</p> <p>This activity is described and assessed as occurring across the whole of the cable corridor. Natural England therefore assumes that the assessment of impacts in terms of suspended sediments is based on an even distribution of disposal occurring across the cable corridor. In terms of the exposure of features within designated sites (Thanet Coast SAC in the RIAA’s case) NE is concerned that this may not represent a realistic worst case scenario for assessing impacts (eg smothering). From experience of other windfarms and cable activities, disposal is more likely to occur at discrete locations, and therefore plumes and deposition at and from these locations are likely to be bigger than what has been assessed as the worst case scenario.</p>
10.	Offshore Ornithology	With regards to the Offshore Ornithology Natural England’s primary comments are associated with the conclusions regarding the designated

		sites potentially affected by this development are highlighted within the latest SoCG submitted at Deadline 3.
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6. Biogenic Reef Mitigation Plan - Revision B – Additional Observations at Deadline 3

- 6.1. Following a telecall on the 14th January with the applicant and subsequent discussions within Issue Specific Hearing 3 and via email, the applicant has taken an action to make explicit the links between the geophysical surveys and the biogenic reef plan to ensure that the geophysical survey dataset is ground truthed in order to inform the biogenic reef plan. This is for both pre and post construction surveys to validate the success of any micrositing that has occurred around biogenic reef, both within and outside of designated sites. Natural England welcomes this clarification.
- 6.2. Despite this proposed monitoring of biogenic reef, and as highlighted within section 2.3, further pre and post monitoring within the MCZ is required to determine the impacts upon any designated features from the proposed activities, particularly from sandwave clearance or cable protection.

7. Appendix 1 - Annex A and Annex B of Deadline 1 Submission – Offshore Project Description Assessed in the Environmental Statement and Project Description Transcription into the Application

- 7.1. Within Natural England’s Relevant Representations it was stated the project description did not clearly highlight the worst case scenarios with inconsistencies highlighted across many of the environmental statement (ES) chapters. We therefore welcome the tabulation of the worst case scenarios for the proposed activities and the project transcription audit emphasising the final consented value the applicant requires and the differences across the original ES chapters.
- 7.2. From table 7 in Annex B, the majority of the changes to the overall requested consented value are minor and would not make any material difference to the conclusions the applicant has made in the relevant ES chapters. However, there is some significant changes to the total maximum volume of disturbance for O&M cable works for both the inter-array and export cables. Natural England previously raised concerns that the applicant has proposed reburial of the entire inter array cable every five years. In addition the total volume of 3,039,000 m², highlighted in table 7 for O&M cable works, has not being sufficiently presented in chapters 6.2.1, 6.2.2 and 6.2.5. This raises concerns that this volume was not appropriately assessed if the maximum extents were not defined. Further concern is provided in the Outline Operations and Maintenance Plan (Application reference 8.10) which highlights in table 10.1 that cable repair and replacement is marked as green, and not needing any additional marine licence if the volumes do not exceed those in the ES. Due to the uncertainty displayed by the proposed O&M activities, this should be marked as amber as an additional licence may be required.
- 7.3. To provide certainty these total impact volumes should be presented in the DCO to provide that clear audit trail and certainty to the regulator that the need for an additional marine licence can be triggered and assessed appropriately if and when required. Natural England understand that the majority of this disturbance volume is associated with the Inter-Array cable and therefore outside any designated sites but in considering the export cable is there a figure that can be provided for the amount of potential disturbance within Goodwin Sands pMCZ and has it been considered in the MCZ assessment? Further still, will any operations and maintenance activities

take into account the BRMP?

8. DCO (Revision B)

8.1. Monitoring Obligations

8.1.1. Natural England are content that the SMRMP and BRMP are both secured within the latest version (Rev. B) of the draft DCO. As is noted by the latest SoCG and comments in section one and six of this document these plans are nearing completion and agreement with the applicant. Following these comments being addressed Natural England envisage these plans will be agreed. We also welcome the addition of the Site Integrity Plan (SIP) being secured within the DCO and have provided comments within section 4 of this document. The cable exclusion zone, which ensures the exports cables avoid the Thanet Coast SAC, has also now been secured within the DCO.

8.1.2. Natural England have previously raised concerns regarding the lack of an In Principle Monitoring Plan (IPMP), particularly for monitoring ornithological receptors. Through engagement with the SoCG we are glad to note that the applicant has committed to submitting a draft IPMP for ornithology at deadline 3. We shall review this in due course and provide feedback to the applicant and the examining authority. As is highlighted in section 2, further benthic monitoring associated with the Goodwin Sands pMCZ should also be committed to and secured within the DCO. Although we welcome the commitments around the BRMP and now cable protection, the effects of activities such as sandwave clearance within the pMCZ need to be sufficiently monitored to determine the recovery of the designated features.

8.2. Other Plans and Conditions

8.2.1. Natural England are content that the following documents are secured within the DCO:

- Project Environmental Management Plan
- Scour and Cable Protection Plan
- A cable specification, installation and monitoring plan
- An Offshore Operations and Maintenance Plan
- A Site Integrity Plan (SIP)

8.2.2. As stated in section 2.4.1, regarding Natural England's concerns around sand wave clearance, particularly in Goodwin Sands pMCZ, a sandwave clearance plan should be conditioned within the DCO to ensure the effects of sandwave clearance and disposal are appropriately considered and addressed post-consent.

8.2.3. Natural England are still seeking to alter the wording of condition 16(3) within Part 4 regarding the results of initial noise measurements. Although the efficacy of soft start is no longer under scrutiny the change we are seeking provides a mechanism for piling to cease quickly in a situation where noise monitoring confirms there is a significant issue.

For any queries relating to the content of this letter please contact me using the details provided below.

Yours sincerely

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