

From: [Wilson, Jennifer](#)
To: [Hutchinson, William](#)
Cc: [Humpheryes, Ian](#)
Subject: FW: NE Saltmarsh Mitigation Plan Comments
Date: 04 March 2019 13:58:49
Attachments: [image001.gif](#)
[image002.gif](#)
[image003.gif](#)
[image004.gif](#)
[image005.gif](#)
Importance: High

Will

We are satisfied that you have captured our concerns well in your comments. We have no further comments to make.

Kind Regards,

Jennifer Wilson
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From: Hutchinson, William [<mailto:William.Hutchinson@naturalengland.org.uk>]
Sent: 01 March 2019 11:18
To: Wilson, Jennifer <jennifer.wilson@environment-agency.gov.uk>; Humpheryes, Ian <ian.humpheryes@environment-agency.gov.uk>
Cc: Relf, Christina <Christina.Relf@naturalengland.org.uk>
Subject: NE Saltmarsh Mitigation Plan Comments

Hi Jen and Ian,

As discussed, the table below highlights NE's comments on the Saltmarsh Mitigation and Monitoring Plan as submitted by the applicant at Deadline 3. Feel free to make any edits, but hopefully I have captured some of the points we discussed earlier this week.

Any queries, let me know.

Kind regards,

Will

Saltmarsh Mitigation, Reinstatement and Monitoring Plan – Revision B

Point	Section	Comment
	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?

2.3.4 – 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?
Work Site Establishment	<p>How will the relevant machinery gain access to the saltmarsh?</p> <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>
Trench Excavation	<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 experienced 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>
4.1.3	<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 much 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> <p>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.</p>
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 ensure that vehicles are clean before arriving at site.</p> <p>The location, orientation and time of year of any photos should be the same</p>

Table 4 - Ecology	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.
Table 4- Transport and Access	<p>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.</p> <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.</p>
6.1.1. - 6.1.5.	<p>Vegetation height and any species of conservation importance should also be noted.</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>
7.1.1.	Surveys at years 2 to 5 should occur at the same time of year to ensure an accurate comparison between surveys.

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