



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES

2010

East Anglia ONE North Offshore Windfarm

Appendix F5 to the Natural England Deadline 2 Submission

NE Comments on Outline Sabellaria Reef Management Plan [REP1-044]

For:

The construction and operation of East Anglia One North Offshore Windfarm, a 800MW windfarm which could consist of up to 67 turbines, generators and associated infrastructure, located 36km from Lowestoft and 42km from Southwold.

Planning Inspectorate Reference: EN010077

17th November 2020



Natural England's Comments on Outline Sabellaria Management Plan submitted at Deadline 1 [REP1-044]

This document is applicable to both the East Anglia ONE North and East Anglia TWO applications, and therefore is endorsed with the yellow and blue icon used to identify materially identical documentation in accordance with the Examining Authority's (ExA) procedural decisions on document management of 23rd December 2019. Whilst for completeness of the record this document has been submitted to both Examinations, if it is read for one project submission there is no need to read it again for the other project.

Summary

1. DCO/dML condition: Natural England will provide further comment on the adequacy of how this plan is secured in the DCO/dMLs once the revised draft DCO/dML is submitted by the Applicant at Deadline 3.
2. Protection of *Sabellaria spinulosa* reef outside of designated sites: Please be advised that *Sabellaria spinulosa* reef of all quality is protected under Section 40 and 41 of the NERC Act 2006.
3. Please see Appendix F3 of our Relevant/Written Representations [RR-059] on generic advice on *Sabellaria spinulosa* reef. Our advice that impacts on *Sabellaria spinulosa* reef should be avoided, reduced, and mitigated inside and outside of designated sites remains unchanged.
4. Therefore we agree with the Applicant's proposals where impacts are unavoidable to reduce the impacts as much as possible and only go through lower quality areas of reef.
5. In addition monitoring of reef pre and post construction is welcomed to determine reef recoverability from OWF activities.
6. We would also encourage the Applicant to consider Net Gain options where there is the potential for *Sabellaria spinulosa* reef to be impacted by OWF construction works.



Detailed Comments

Point #	Para.	Comment	RAG status
1.	12	Natural England notes that the applicant proposes to avoid <i>Sabellaria spinulosa</i> reef (where practicable) during UXO detonation with a suitable buffer. However, NE advises that the in principle buffers, depending on the size of the bombs and the known area of seabed impact, should be agreed now as part of the outline plan.	
2	13	Whilst we assume it is a given that where micro-siting is successful there will be no requirement for cable protection in an area of reef it would be helpful to discuss for the outline plan to make clear the intention for the use of cable protection within areas of reef where avoidance isn't possible. Noting that NE's preference would be for the use of cable protection to be avoided in these areas.	
3	14.	We are noting as with point 1 above that decisions are being deferred until post consent. However we believe that in principle discussions could happen now based on the East Anglia ONE installation.	
4	Table 1.1	It should be noted that in consultation with the MMO should also include 'and the relevant SNCB'.	
5	Table 1.1	Point 5. How will it be ensured that proposals for UXO and cable installation mitigation will be aligned?	
6	1.7.2	Please note that Natural England's advice is that all reef is protected and should therefore be avoided.	
7	1.7.2	Please note that the adoption of The Wash 'core' reef approach has been unsuccessful for other projects within designated sites i.e. Norfolk Boreas and Vanguard due to limited data sets and over a sufficient timeframe. Therefore it is unlikely to be achievable for this project	