



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

East Anglia ONE North Offshore Windfarm

Appendix C2b to the Natural England Deadline 2 Submission
NE Comments on SPA Crossing Method Statement [REP1-043]

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 SPA Crossing Statement [REP1-043] submitted at Deadline 1

This document should be considered alongside Natural England's Deadline 1 Appendix C2 [REP01 -163].

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. Natural England welcomes the inclusion of the conservation objectives within the plan, and note that impacts are considered within HRA [APP – 044]. However we believe further information is required to rule out no adverse effect beyond all reasonable scientific doubt. Especially in relation splitting the SPA in two for at least one breeding season per project.
2. Natural England notes the Applicant's Deadline 1 Appendix 6 to ExA [REP01 - 090] questions included the Order limit for both 'Trenchless' and 'Open Trench' operations. On reviewing that document it should be noted that whilst the Order Limit is wider for trenchless techniques there will be no surface impact on the SPA supporting habitat. And that the Open trench technique will dissect the SPA in two and this may impact wider ecosystem function. In addition this disruption could stretch over multiple breeding seasons and beyond the installation, so every effort should be made to avoid, reduce and mitigate impacts.
3. Natural England would welcome more detail on open cut trench operations within the SPA including all plant and machinery required for excavating and backfilling within the SPA crossing and the SPA buffer. Natural England notes that the further detail will be provided prior to construction in the final version of this plan. We advise that impacts should be considered as much as possible during the consenting phase and by not considering this in more detail now, some yet to be identified likely significant effect, may require a further HRA. The further HRA would need to be undertaken by the local planning authority as the regulator for the DCO prior to construction to ensure that there remains no adverse effect on integrity from the proposed works.



4. As a statutory undertaker The Applicant has legislative obligations to not just maintain, but also to enhance the designated site features. Therefore we advise that true enhancement should last beyond the 5 years post installation which is currently proposed and consideration should be given to reinstating the site post installation to provide a better ecological value than it currently has.
5. Natural England notes that two of the proposed mitigation measures for supporting 'open trench' installation may not be true mitigation when compared to the 'trenchless' technique. Especially if works extend into subsequent breeding seasons as suggested they might. In addition, removal of 24hr working is more of a local residence issue than an ecological one as the 24hr working is only required for certain parts of the work and measures can be put in place to avoid/mitigate disturbance to interest features of the site.
6. Natural England advises that more detail is required regarding habitat reinstatement and monitoring within the SPA crossing. Whilst we recognise that the Applicant has provided more detail within the crossing method statement of what will be planted; the justification as to why and what function they will provide and over what time frame is still required. There is no consideration of how long the habitat will take to recover and what monitoring will be undertaken