



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

East Anglia TWO Offshore Windfarm

Appendix F2b to the Natural England Deadline 1 Submission

Comments on Appendix 5: Outer Thames Estuary Cabling Note [AS-042]

For:

The construction and operation of East Anglia Two Offshore Windfarm, a 900MW windfarm which could consist of up to 75 turbines, generators and associated infrastructure, located 37km from Lowestoft and 32km from Southwold.

Planning Inspectorate Reference: EN010078

2nd November 2020



Appendix F2 Natural England's Comments on Appendix 5 Outer Thames Estuary Cabling Note [AS-042]

This document is applicable to both the East Anglia ONE North (EA1N) and East Anglia TWO (EA2) 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.

1. Summary

Natural England is concerned that impacts to Outer Thames Estuary SPA from sandwave levelling have not be screened into the Habitats Regulation Assessment (HRA). Please note that as there is an impact pathway due to changes to supporting SPA habitat, we believe that there is likely significant effect. In addition, we advise that including evidence from East Anglia ONE would strengthen some of the statements made in relation to cable protection, e.g. the amount and locations of cable protection along the export cable for that project.

2. Point 13:

It is not clear where any dredged sand will be deposited. We would welcome this to remain within the boundary of the SPA and upstream of the works so that no sediment is lost from the sandbank system and to aid recovery.

3. Point 17:

Please note that Natural England advises that it is not appropriate to compare the impacts against the total area of the Outer Thames Estuary SPA. Our main concern is the supporting habitats of the interest features of the SPA. Therefore we advise that the impacts should relate to each of the supporting habitat types and how installation and operation and maintenance activities may alter the structure and function of these habitats and in turn the SPA features.



4. Points 18 & 19:

Points 18 and 19 present a series of statements indicating that sandwaves and sandbanks will recover, but no evidence is presented to support these statements, or that specifies the duration of any recovery. This occurs throughout the document, but is highlighted in these points. Such evidence would support the understanding of potential impacts, *i.e.* recovery of sandbanks will take *X* months/years, which will impact *Y* species for *Z* seasons. Currently, the focus is on EIA impacts rather than HRA, such as impacts to supporting habitats of the SPA species.

5. Point 32 onwards:

Unexploded Ordnance (UXO) clearance should also consider how detonations impact on sediment and ability to support the SPA.

6. Section 2.7

This section is focused on the EIA rather than changes to the structure and function of supporting habitat of the interest features of the SPA. Further consideration should be given to these interest features and the conservation advice package for the site.