



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES

2010

East Anglia TWO Offshore Wind Farm

Appendix F5b to the Natural England Deadline 5 Submission

**Natural England's comments on Outline Sabellaria Reef Management Plan
[REP4-040]**

For:

The construction and operation of East Anglia TWO Offshore Wind Farm, a 900MW wind farm which could consist of up to 75 turbines, generators and associated infrastructure, located 37km from Lowestoft and 32km from Southwold.

Planning Inspectorate Reference: EN010078

3rd February 2021



Natural England's comments on Outline Sabellaria Reef Management Plan [REP4-040]

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

Further to the advice provided by Natural England at Deadline 2 [REP2-056], Natural England provides the following advice noting that further consultation with all interested parties in particular the MMO, is required.

1. Whilst, Natural England welcomes the inclusion of a 60m clearance buffer for UXO detonations Natural England notes that:-

'...the Applicants would like to retain the ability to discuss reef buffer requirements on a case by case basis during the preconstruction period, where for example the proximity of several reefs makes micrositing with a minimum 50m buffer (or 60m for UXO clearance) challenging...'

However, we are concerned that such a request is not condition-able and therefore the mitigation remains unsecure, even if explained within a listed DCO/dML plan. Therefore, the mitigation measure would remain open to challenge.

2. Natural England notes that the following text has been included within Table 1.1 under point 6: -

'...During preparation of the Design Plan Natural England will be consulted - It is anticipated that in discharging the aforementioned Design Plan conditions, the Sabellaria reef report submitted to discharge UXO clearance would be cross-referenced / re-submitted alongside diagrams describing the windfarm design and how Sabellaria reefs have been avoided where practicable...'



However, dependent on the Applicant's project timelines, and because the UXO works are disassociated with the start of construction, and could happen at any time it is highly probable the **Sabellaria reef report used to inform UXO clearance works will not also be able to be used to support the Design Plan and commencement of installation works.**

Natural England's standard advice is that an Annex I survey demonstrating presence/absence of biogenic reef should be undertaken no longer than 12 months prior to commencement of any works. This is because *Sabellaria spinulosa* reef can develop within a 12-month period.

Therefore, we advise that the In-Principle Monitoring Plan (IPMP) must secure the required monitoring. And unless both the UXO clearance and commencement of the OWF installation occurs within 12-18 months of the survey being undertaken a second Annex I reef survey and report will be required prior to construction commencing.

3. Whilst Natural England welcomes the Applicant attempting to address (in paragraph 20) our detail comment #2 [REP2-056] in relation to the potential requirement for cable protection in areas of reef where installation is unavoidable; it should be noted that the rationale presented to demonstrate the need for cable protection is flawed. Natural England advises that *Sabellaria spinulosa* reef is more often than not associated with mixed sediment and on leeward sides of sandbanks and not the sandier crests and more mobile areas of sandbanks as stated in the Outline Sabellaria Management Plan.
4. As submitted into examination for Hornsea Project 3, Norfolk Vanguard and Norfolk Boreas areas of mixed sediment have proven to be more challenging for cable installation. Case example is cable installation within the Wash and North Norfolk Coast SAC where cables have been sub-optimally buried in areas of mixed sediment and post installation requests have been submitted for cable protection. In order to commit with any certainty that cable protection can be avoided in areas of potential reef Norfolk Boreas utilised available geotechnical investigations to undertake a cable burial assessment which was submitted into examination to provide the necessary evidence to support the proposals. Therefore, we advise that something similar for these projects is submitted into examination to demonstrate that cables can be buried to the optimum depth in areas of



'unavoidable' reef. Or assures that that sub-optimally buried cables would not require external protection i.e. <1m