



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES

2010

East Anglia TWO Offshore Wind Farm

Appendix F9 to the Natural England Deadline 7 Submission

Natural England's All Other Matters Update

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

4th March 2021



Natural England's All Other Matters Update

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.

Introduction

This Appendix includes comments on the following documents submitted by the Applicant at Deadline 6:

- Outline *Sabellaria* Reef Management Plan - Version 03 [REP6-039, REP6-040]
- Offshore In-Principle Monitoring Plan - Version 03 [REP6-015, REP6-016]
- Outline Landfall Construction Method Statement – Version 02 [REP6-022, REP023]
- Horizontal Directional Drilling Verification Clarification Note - Version 01 [REP6-024]

1. Outline *Sabellaria* Reef Management Plan [REP6-039, REP6-040]

1. Natural England notes that the majority of the amendments to this plan are in Section 4. Even with the amendments Natural England advises that there remains considerable uncertainty around the likelihood of buffers being encroached upon and to what degree. Therefore, our advice remains unchanged in relation to the confidence that micrositing around *Sabellaria* reefs is achievable. Given this matter is unlikely to be progressed further during examination, the ExA and decision makers will be required to make a risk based judgement on whether or not they feel that impacts to *Sabellaria spinulosa* reef can be suitably avoided and/or mitigated.

2. Offshore In-Principle Monitoring Plan [REP6-015, REP6-016]

2.1 General

2. Natural England would welcome confirmation from Applicant's that any monitoring required in relation to compensation measures will be included in the compensation packages rather than in the IPMP.



3. We note that at Paragraph 15 that the focus remains on EIA concerns and not with no mention to monitoring of residual impacts to designated sites. Though we do note that the proposed monitoring is likely to address the majority of these without explicitly saying so.
4. While not specific to Natural England's remit, Natural England welcomes the sandeel monitoring and would be interested to see the results as this may also determine prey availability for Annex 1 and Annex 2 species from designated sites.

2.2 Benthic Ecology

5. Natural England welcomes the inclusion of text to demonstrate avoidance and the acknowledgement that there may be a requirement for more than one survey post construction. But we note there is no reference to this relating to understanding reef recovery.
6. We also welcome the commitment to undertake a second Annex 1 reef survey should there be a gap of more than 18 months between the survey to inform UXO clearance and start of construction.

2.3 Marine Mammals

7. Table 4, first row – Natural England advise the term 'statistically' should not be included here. Natural England have recently had a discussion with Cefas and MMO and it was concluded that 'significantly' should not be assigned a threshold quantity. The consensus between NE and CEFAS is there are too many variables to come up with a standardised threshold for what is significant. It would vary greatly due to water depths, substrates, receptor, location etc. The decision to stop or allow piling to continue would need to be made on a case by case basis using expert judgement.
8. Table 4, second row – Natural England welcomes the commitment outlined here to work with the other East Anglia Zone projects and looks forward to working with the Applicant to achieve this, as appropriate.



2.4 Offshore Ornithology

9. Natural England welcomes that EA2 IPMP has been updated to include RTD measures.

3. Outline Landfall Construction Method Statement [REP6-022, REP023]

3.1 General Comments

10. How will Natural England's Offshore windfarm project team and the MMO be consulted by the Local Planning Authority?

3.2 Specific Comments

11. (3) Natural England requests that the finalised Landfall Method Statement is submitted to the relevant regulator/s in consultation with relevant SNCB. Because whilst we may have been consulted beforehand through our Discretionary Advice Service, our statutory remit remains.
12. (3) Natural England notes that for most other OWF projects, excluding EA1 and EA3, the MMO has been the lead regulator due to environmental issues normally occurring below Mean High Water (MHW). We would welcome MMO's consideration of how this will work in practice, with Local Planning Authorities (LPAs) leading on Horizontal Directional Drilling (HDD) activities.
13. (6) How will MMO be incorporated in the decision making for marine elements of HDD?
14. (11) Please be advised that experience has shown that the feasibility of HDD is often based on sediment type and even short sections of HDD (~1km) can fail e.g. Lincs OWF 2010. It should also be noted that in recent years there have been issues with sinkholes e.g. Hornsea 2 and Triton Knoll. And even though the sediment conditions are different, lessons must be learnt to make sure that it won't happen here. This should be considered in the HDD verification note.
15. (26-28) 4.2.2 we note that this section has been included due to impacts to local people, with a commitment to locate machinery to reduce noise. However, we query



what would happen if there is conflict between reducing noise and increasing ecological issues in the placement of the equipment?

16. Annex 2 – Monitoring: the monitoring is of coastal processes and remedial action, both are relevant to Natural England and MMO, how will consultation be undertaken?
17. (16) Whilst, Natural England did not specify the monitoring being undertaken, we agree with the proposals to use the ARCMP data and therefore query if the Applicant will fund the continuation of the surveys (if required)?
18. (22) Natural England queries who will receive the monitoring reports? This data could help inform SSSI site management in this area.

4. Horizontal Directional Drilling Verification Clarification Note [REP6-024]

19. Natural England welcomes this document and believe that the feasibility review should be updated once preconstruction surveys are completed. This therefore should be a named plan on the DCO/dML.