



Norfolk Vanguard Offshore Wind Farm

Outline Scour Protection and Cable Protection Plan

(Tracked Changes)

Applicant: Norfolk Vanguard Limited
Document Reference: 8.16 (Version 2)

Deadline 7

Date: 02 May 2019

Author: Royal HaskoningDHV

Photo: Kentish Flats Offshore Wind Farm





Date	Issue No.	Remarks / Reason for Issue	Author	Checked	Approved
20/04/19	<u>01</u>	<u>First draft of Revision 2</u>	<u>GK</u>	<u>GK</u>	
02/05/19	02	Deadline 7 submission	<u>GK</u>	<u>GK</u>	RS





Table of Contents

1	Introduction	<u></u> 1
1.1	Background	<u></u> 1
1.2	Purpose of this document	<u></u> 2
2	Foundation Scour Protection	<u></u> 5
3	Cable Protection	<u></u> 7
3.1	Unburied cables	<u></u> 7
3.2	Cables approaching turbines and platforms	<u></u> 7
3.3	Crossings	<u></u> 8
3.4	Landfall	<u></u> 8
3.5	Types of cable protection	<u></u> 10
3.6	Cable protection quantities and location	10
4	Scour and Cable Protection Assessment in ES Chapters	<u></u> 13
5	Summary	<u></u> 15
<u>1</u>	<u>Introduction</u>	1
<u>1.1</u>	Background	1
<u>1.2</u>	Purpose of this document	2
2	Foundation Scour Protection	3
3	Cable Protection	5
<u>3.1</u>	<u>Unburied cables</u>	5
3.2	Cables approaching turbines and platforms	5
<u>3.3</u>	<u>Crossings</u>	6
<u>3.4</u>	<u>Landfall</u>	6
<u>3.5</u>	Types of cable protection	8
<u>3.6</u>	Cable protection quantities and location	8
4		
4	Scour and Cable Protection Assessment in ES Chapters	 10





Figures

Figure 3.1 Existing Cables and Pipelines	9
Tables	
Table 1 Worst case scenario for scour protection	<u></u> 6
Table 2 Cable protection parameters	<u></u> 11
Table 3 Impacts relating to the presence of scour and cable protection	<u></u> 13
Table 1 Worst case scenario for scour protection	4
Table 2 Cable protection parameters	9

Table 3 Impacts relating to the presence of scour and cable protection......10





Glossary

DML	Deemed Marine Licence
EIA	Environmental Impact Assessment
ES	Environmental Statement
GBS	Gravity Base Structure
HDD	Horizontal Directional Drilling
LiDAR	Light Detection and Ranging
MMO	Marine Management Organisation
MW	Megawatt
NV East	Norfolk Vanguard East
NV West	Norfolk Vanguard West
OFTO	Offshore Transmission Operator
OWF	Offshore Wind Farm
SAC	Special Area of Conservation
ZEA	Zone Environmental Appraisal

Terminology

Array cables	Cables which link the wind turbines and the offshore electrical platform.				
Interconnector cables	Buried offshore cables which link the offshore electrical platforms				
Landfall	Where the offshore cables come ashore at Happisburgh South				
Offshore accommodation platform	A fixed structure (if required) providing accommodation for offshore personnel. An accommodation vessel may be used instead				
Offshore cable corridor	The corridor of seabed from the Norfolk Vanguard OWF sites to the landfall site within which the offshore export cables would be located.				
Offshore electrical platform	A fixed structure located within the wind farm area, containing electrical equipment to aggregate the power from the wind turbines and convert it into a more suitable form for export to shore.				
Offshore export cables	The cables which bring electricity from the offshore electrical platform to the landfall.				
Offshore project area	The overall area of Norfolk Vanguard East, Norfolk Vanguard West and the offshore cable corridor				
Safety zones	A marine zone outlined for the purposes of safety around a possibly hazardous installation or works / construction area under the Energy Act 2004.				
Scour protection	Protective materials to avoid sediment being eroded away from the base of the foundations as a result of the flow of water.				
The Applicant	Norfolk Vanguard Limited				
The OWF sites	The two distinct offshore wind farm areas, Norfolk Vanguard East and Norfolk Vanguard West				
The project	Norfolk Vanguard Offshore Wind Farm, including the onshore and offshore infrastructure				





1 INTRODUCTION

1.1 Background

- 1. Norfolk Vanguard Limited ('the Applicant', an affiliate company of Vattenfall Wind Power Limited) is seeking a Development Consent Order (DCO) for Norfolk Vanguard, an offshore wind farm (OWF) in the southern North Sea.
- 2. The OWF comprises two distinct areas, Norfolk Vanguard East (NV East) and Norfolk Vanguard West (NV West) ('the OWF sites'), within which wind turbines, associated platforms and array cables will be located. The offshore wind farm will be connected to the shore by offshore export cables installed within the offshore cable corridor from the wind farm to a landfall point at Happisburgh South, Norfolk. From there onshore cables would transport power over approximately 60km to the onshore project substation at Necton, Norfolk. A full project description is given in the Environmental Statement, Chapter 5 Project Description.
- 3. Once built, Norfolk Vanguard would have a capacity of up to 1800MW, with the offshore components comprising:
 - Wind turbines;
 - Offshore electrical platforms;
 - Accommodation platforms;
 - Met masts;
 - Lidar;
 - Array cables;
 - Inter-connector cables; and
 - Export cables.
- 4. The key onshore components of the project are as follows:
 - Landfall;
 - Onshore cable route, accesses, trenchless crossing (e.g. Horizontal Directional Drilling (HDD)) zones and mobilisation areas;
 - Onshore project substation; and
 - Extension to the Necton National Grid substation and overhead line modifications.
- 5. Norfolk Vanguard is located approximately 47km from the closest point the Norfolk Coast. NV East covers an area of approximately 297km² and NV West covers an area of around 295km².





- 6. Norfolk Vanguard Limited is currently considering constructing the project in either a single phase or two phases (up to a maximum of 1800MW). The layout of the wind turbines will be defined post consent but will be based on the following maxima:
 - 1800MW in NV East, 0MW in NV West; or
 - OMW in NV East, 1800MW in NV West.
- 7. Any other potential layouts that are considered up to a maximum of 1800MW (e.g. 1,200MW in NV West and 600MW in NV East; 600MW in NV West and 1,200MW in NV East; or 900MW in NV West and 900MW in NV East) lie within the envelope of these scenarios.

1.2 Purpose of this document

- This Outline Scour Protection and Cable Protection Plan outlines the key principles of how Norfolk Vanguard Limited intends to manage the protection of foundations and cables from the effects of scour and hazards (e.g. snagging anchors in the case of cables), both immediately post-construction and throughout the operational life of Norfolk Vanguard. This statement plan also provides a summary of the effects of scour and cable protection as presented in the Environmental Statement (ES).
- 8.7. This Outline Scour Protection and Cable Protection Plan relates to cable protection in the offshore cable corridor outside the Haisborough, Hammond and Winterton Special Area of Conservation (SAC), as well as any scour protection and cable protection in the OWF sites. Cable protection within the Haisborough, Hammond and Winterton SAC is outlined in Section 3 for completeness, however this is considered in further detail in the Outline Haisborough, Hammond and Winterton SAC Site Integrity Plan (SIP) (document reference 8.20) and must be agreed with the Marine Management Organisation (MMO) in consultation with relevant Statutory Nature Conservation Bodies (SNCBs) in accordance with Condition 9(1)(m) of DCO Schedules 11 and 12. Cable protection within the Haisborough, Hammond and Winterton SAC will therefore not be considered in the final Scour Protection and Cable Protection Plan.
- 9.8. Geophysical and geotechnical surveys were completed by Fugro between 19th June and 4th September 2012 for NV East (formerly East Anglia FOUR) and between 7th September and 14th November 2016 for NV West and the offshore cable corridor. As such, there is a good understanding of the existing environment at Norfolk Vanguard and its adjacent areas. Further information on the underlying geological conditions of the sites will be developed through further geophysical and geotechnical surveys prior to construction.





- 10.9. The EIA has assumed a worst case scenario of all foundations having scour protection in order to provide a conservative assessment.
- 10. Cable burial is expected to be possible throughout the offshore cable corridor, with the exception of cable crossing locations. In order to provide a conservative and future-proof impact assessment, a contingency estimate for cable protection is included in the assessment, should cable burial not be possible (e.g. due to unexpected hard substrate being encountered during the preconstruction surveys or cable burial).
- 11. Version 2 of the Outline Scour Protection and Cable Protection Plan was submitted at Deadline 7 (May 2019) during the Norfolk Vanguard Examination to reflect the following additional commitments made by Norfolk Vanguard Limited to reduce impacts associated with the project:
 - Removal of 9MW wind turbines providing a revised range of 10MW to 20MW turbines;
 - This reduces the maximum number of turbines from 200 to 180 and therefore reduces the overall scour protection requirement;
 - This also reduces the maximum potential array cable protection where cable would be exposed up to 50m either side of each wind turbine (see Section 3.2);
 - Removal of floating foundations;
 - Scour protection has been calculated based on an estimate of up to five times the diameter of the foundation. Floating foundations using gravity anchors had the maximum diameter of the foundation options. The revised scour protection volumes provided in Section 4 are based on Gravity Base Systems (GBS); and
 - Norfolk Vanguard Limited has also committed to reducing cable protection in the Haisborough Hammond and Winterton SAC which is addressed in the Outline Haisborough, Hammond and Winterton SAC SIP (document reference 8.20) and outlined in Section 3.
- 12. A final Scour Protection and Cable Protection Plan would be developed post-consent in consultation with the Marine Management Organisation (MMO) and relevant Statutory Nature Conservation Bodies, as the final design develops and based on information arising from pre-construction surveys, as required under -Condition 14(1)(e) of DCO Schedules 9 and 10 and Condition 9(1)(e) of Schedules 11 and 12:

A scour protection and cable protection plan (in accordance with the outline scour protection and cable protection plan) providing details of the need, type, sources,





- quantity, distribution and installation methods for scour protection and cable (including fibre optic cable) protection.
- 13. In addition, Condition 22 of DCO Schedule 9 and 10) and Condition 17 of Schedule 11-12 requires reporting of cable protection:
 - (1) Not more than 4 months following completion of the construction phase of the project, the undertaker must provide the MMO and the relevant statutory nature conservation bodies with a report setting out details of the cable protection used for the authorised scheme.
 - (2) The report must include the following information—
 - (a) location of the cable protection;
 - (b) volume of cable protection;
 - (c) any other information relating to the cable protection as agreed between the MMO and the undertaker.





2 FOUNDATION SCOUR PROTECTION

- 11.14. The effects of scour are influenced by the marine processes acting upon offshore infrastructure, such as cables and turbine foundations. Depending on metocean conditions, scour and cable protection may be required around foundations and cables to protect against currents and waves that may cause erosion of the seabed.
- Turbines of 10MW to 20MW are being considered for Norfolk Vanguard. As shown in Table 1 below, the worst case scenario for scour protection for the project as a whole relates to 180 x 10MW turbines, whereas the worst case scenario for each individual foundation relates to the 20MW turbines.
- 12.16. For all types of foundations, scour protection material is likely to be installed where required during the construction process in order to mitigate the effects of scour and hence release of suspended sediment and bed level changes in the vicinity of each wind turbine location.
- 13.17. ES Chapter 5 Project Description, Table 5.5 provides detail on the worst-case scenario footprint (including scour protection) for turbines, electrical and accommodation platforms, met masts and LiDAR. These assumptions are based on the maximum requirements for each foundation type, these predicted areas are summarised below:
 - Jacket (pile and suction caisson): Scour protection covering an area which is five times the foundation diameter;
 - Monopile: Scour protection covering an area which is five times the pile diameter:
 - Gravity Base Structure (GBS): Scour protection covering an area which is five times the diameter around foundation; and
 - Suction Caisson: Scour protection covering an area which is five times the foundation diameter; and Floating tension leg: The structure would be held to the seabed under tensioned mooring cables anchoring the structure to the seabed. Anchors would either be pin piles, caissons or a single GBS. As such the scour protection would cover an area which is five times the diameter of each possible anchor foundation.
- **14.18.** As detailed in section 5.4.3 of ES Chapter 5, for all foundation types scour protection would comprise quarried rock, well graded with d50=200 to 400, (i.e. half the stones will be less than a specified median (200 to 400mm diameter) and half will be greater).
- **15.19.** Alternative scour protection solutions such as 'frond systems' are also being considered. These comprise continuous lines of overlapping buoyant polypropylene fronds that when activated create a viscous drag barrier that significantly reduces





- current velocity. The frond lines are secured to a polyester webbing mesh base that is itself secured to the seabed by anchors pre-attached to the mesh base by polyester webbing lines. Grouted mattresses are also being considered.
- 20. The quantities and extent of scour protection would be dependent on current speed, sediment type and the foundation details and would therefore be determined post consent based on the final design and pre-construction surveys. The maximum worst-case scenario has assumed that a maximum of 27,418,759 53,195,398m³ of scour protection will be required in total, for all foundations (see Table 1 Table 1).

 This has been reduced from 53,195,398m³ (a reduction of 48%) following a series of additional commitments made by Norfolk Vanguard Limited during the Examination (see Section 1.2).
- 16.21. The maximum height of scour protection at any given point would be 5m.
- 17.22. The location of turbine foundations and therefore scour protection would be determined post consent based on the final design and pre-construction surveys. but all could be located in NV East; all in NV West; or split between the two OWF sites.

Table 1 Worst case scenario for scour protection

Foundation	Scour protection area per	Scour protection volume per	Maximum number of	Total scour protection (m³)			
	foundation (m ²)	foundation (m³)	foundations				
10MW_ T turbines	30,159.29 (not worst case scenario per turbine - see 20MW turbines))	264,600150,796.45 (not worst case scenario per turbine - see 20MW turbines))	200 180	52,920,000 27,143,361			
20MW turbines	47,123.89	<u>235,619.45</u>	<u>90</u>	21,205,750 (not worst case scenario project total – see 10MW turbines))			
Offshore electrical platforms	10,000	50,000	2	100,000			
Accommodation platforms	10,000	50,000	2	100,000			
Met masts	7,540	37,699	2	75,398			
LiDAR	0	0	2	0			
Total based on 53,195,398							





3 CABLE PROTECTION

3.1 Unburied cables

- 18.23. The preferred method for cable protection would be burial, however as discussed in section 1.2, there may be some locations where array, export or interconnector cables cannot be buried due to cable crossings or substrate type and so alternative methods of protection may be required.
- 19.24. As previously discussed, cable burial is expected to be possible throughout the offshore cable corridor, with the exception of cable crossing locations. In order to provide a conservative and future-proof impact assessment, the following contingency estimates for cable protection are included in the assessment, should cable burial not be possible due to hard substrate which was not identified in the site characterisation surveys:
 - Up to <u>20km-8km</u> of protection per cable pair (<u>40km-16km</u> in total) for the whole offshore cable corridor;
 - Of which, 4km-2km per pair (8km-4km in total) could be within the Haisborough Hammond and Winterton Special Area of Conservation (SAC) (see the Outline Haisborough Hammond and Winterton SAC SIP (document 8.20));
 - Up to 60km for array cables;
 - Up to 15km for interconnector cables;
 - The maximum width and height of cable protection for unburied cable would be
 5m and 0.5m, respectively; and
 - The maximum width and height of cable protection at cable crossings would be 10m and 0.9m, respectively.
- 20. Norfolk Vanguard Limited is committed to minimising the placement of cable protection within the Haisborough, Hammond and Winterton Special Area of Conservation (SAC) and is confident that burial will be possible throughout the SAC. However, to allow for the unlikely event that hard substrate is encountered in the SAC, placement of cable protection for up to 4km per cable (24km in total within the SAC) over the life of the project has been assessed in the ES. This is included within the total cable protection parameters for the export cables, described above.

3.2 Cables approaching turbines and platforms

21.25. It would necessary for cables to be surface laid as they approach each turbine and electrical platform in order for the cables to be connected into J tubes. An estimate





of up to 50m length per cable entering and leaving each device is anticipated, i.e. 100m length per turbine and electrical platform.

3.3 Crossings

- 22.26. Where each Norfolk Vanguard export cable is required to cross an obstacle such as an existing pipeline or cable (see Figure 3.1 Figure 3.1), protection would be installed to protect the obstacle being crossed. Each Norfolk Vanguard cable would then be placed on top of the layer of protection with a further layer of cable protection placed on top.
- 23.27. There are up to nine cables and two pipelines which the Norfolk Vanguard export cables would need to cross (five cables and one pipeline within the SAC). Each crossing would require a carefully agreed procedure between the cable owners. Each crossing agreement will be finalised post consent and following further, preconstruction marine surveys. The maximum width and length of cable protection for cable crossings would be 10m and 100m, respectively. The maximum height of cable crossings is 0.9m.

3.4 Landfall

24.28. Cable protection may be required at each of the landfall Horizontal Directional Drilling (HDD) exit points. This could entail a footprint of up to 36m², based on the use of one concrete mattress¹ (approximately 6m length x 3m width x 0.3m height) as well as rock dumping (approximately 5m length x 5m width x 0.5m height) at each exit point (up to two cable pair exit points).

-

¹ A concrete mattress is a proven way of providing protection to subsea cables. It comprises a grid of heavy cast concrete blocks linked by wire.





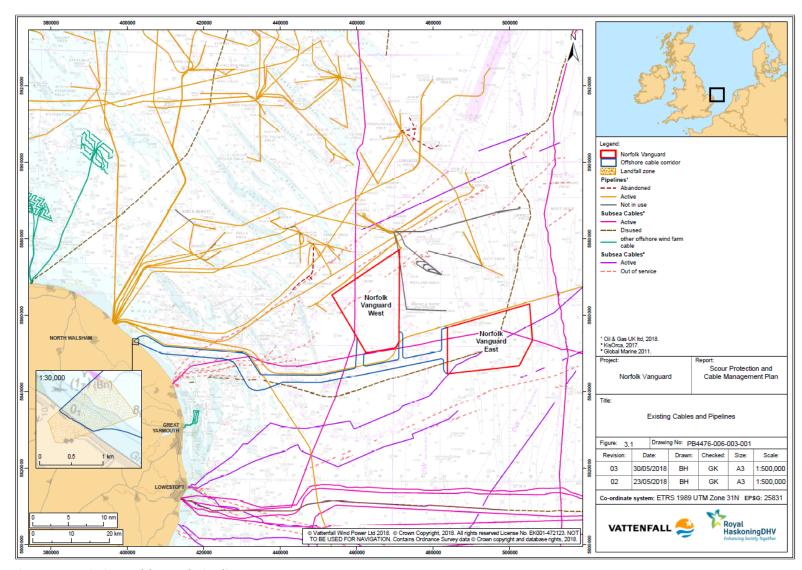


Figure 3.1 Existing Cables and Pipelines





3.5 Types of cable protection

- 25.29. As detailed in section 5.4.14.1 of Chapter 5 Project Description, the following cable protection options may be used and this would be determined during the final design of the project:
 - Rock placement;
 - Concrete mattresses;
 - Grout or sand bags;
 - Frond mattresses; and
 - Uraduct or similar.

3.6 Cable protection quantities and location

26.30. The quantities, extent and location of cable protection would be dependent on the final design and findings of the pre-construction surveys. Table 2 Table 2 provides an overview of the maximum area and volume of cable protection as well as providing an overview of where certain cable protection may be required.





Table 2 Cable protection parameters

Table 2 Cable protection parameters						
	Length (m)	Width (m)	Height (m)	Total area (m²)	Total volume (m³)	Location (see Figure 1)
Array cables						
Unburied (based on 10% of the total cabling)	60 <u>,</u> 000	5	0.5	300,000	150,000	NV East and/or NV West
Approaching turbines (100m x 200 180 turbines)	20 18,000	5	0.5	10 90,000	50 45,000	NV East and/or NV West
Crossings (based on 10 crossings)	1,000	10	0.9m in total, including existing cable	10,000	9,000	NV East and/or NV West
Total array cable protection				400,000	204,000	
Interconnector cables						
Approaching electrical platforms (100m x 2 platforms)	200	5	0.5	1,000	500	NV East and/or NV West
Unburied (based on 10% of the total cabling)	15,000	5	0.5	75,000	37,500	OWF sites and/or within offshore cable corridor between NV East and NV West
Crossings (none)	N/A	N/A	N/A	N/A	N/A	N/A
Total interconnector cable protection				<u>76,000</u>	38,000	
Export cables						
Unburied (based on 10% of the total cabling) 2	40 <u>16</u> ,000	5	0.5	20 <u>8</u> 0,000	10 40,000	Total Wwithin the offshore cable corridor. The property of this could be within the Haisborough Hammond and Winterton SAC
Crossings (based on 22 crossings)	2,200	10	0.9m in total,	22,000	19,800	At location of existing cables and pipelines shown on Figure 1

² There was an error in version 1 of the Outline Scour Protection and Cable Protection Plan as discussed in the Errata report (document reference Pre-ExA; Errata; 9.4). The total length should have been 20km rather than 40km. This has now been further reduced based on Norfolk Vanguard Limited's commitment to limit cable protection within the Haisborough Hammond and Winterton SAC to 4km, 5% of the cable length in the SAC (reduced from 8km). This is addressed in the Haisborough Hammond and Winterton SAC SIP (document 8.20)





	Length (m)	Width (m)	Height (m)	Total area (m²)	Total volume (m³)	Location (see Figure 1)
			including existing cable			
Protection at the landfall HDD exit locations - mattress	12	3	0.3	36	11	At the -5.5m LAT depth contour or deeper within the offshore cable corridor (approximate length of 1000m from the onshore
Protection at the landfall HDD exit locations – rock dumping	10	5	0.5	50	25	drilling location)
Total export cable protection				102,086	<u>59,836</u>	





4 SCOUR AND CABLE PROTECTION ASSESSMENT IN ES CHAPTERS

- 31. The offshore chapters of the ES (Chapters 8 18) present potential impacts relating to the presence of scour and cable protection during the operational phase of Norfolk Vanguard, where relevant.
- 27.32. It is important to highlight that the assessments presented in the ES are based upon the worst case scenario relevant to a given potential impact, as drawn from details pertaining to the type, quantity and location of scour and cable protection specified in the Project Description. Table 3 Table 3 details the ES chapters and relevant impact assessments which consider these impacts. Impacts were assessed as negligible or minor significance (i.e. not significant) based on the worst case scenario at the time of the DCO submission. The worst case scenario has been further refined, as presented in Sections 2 and 3 of this plan and therefore the impacts would be the same or less than presented in the ES (i.e. negligible or minor significance; not significant) based on the refined scenarios.

Table 3 Impacts relating to the presence of scour and cable protection

ES Chapter	Impacts Considered
Chapter 8: Marii	ne Geology, Oceanography and Physical Processes
Table 8.15	Changes to the tidal regime due to the presence of structures in the OWF sites (wind
	turbines and platforms).
	Changes to tidal currents created by presence of wind turbines
	Changes to waves created by presence of wind turbines
Table 8.15	Changes to the sediment transport regime due to the presence of structures in the OWF
	sites
Table 8.15	Loss of seabed morphology due to the footprint of wind turbine foundation structures
Table 8.15	Morphological and sediment transport effects due to cable protection measures for array
	and interconnector cables
Table 8.15	Morphological and sediment transport effects due to cable protection measures for offshore
	export cables (including nearshore and at the coastal landfall)
Chapter 10: Ben	thic and Intertidal Ecology
Table 10.12	Permanent loss of seabed habitat in the OWF sites due to the presence of wind turbine and
	platform foundations, scour protection, array cables, inter-connector cables, and cable
	protection.
Table 10.12	Permanent loss of seabed habitat in the offshore cable corridor due to cable protection
Table 10.12	Colonisation of turbines/cable protection/scour protection due to the presence of turbines,
	cable protection and scour protection
Chapter 11: Fish	and Shellfish Ecology
Table 11.11	Permanent loss of seabed habitat in the OWF sites through the presence of wind turbine
	and platform foundations, scour protection, array cables, inter-connector cables, and cable
	protection
Table 11.11	Introduction of hard substrate (turbine foundations and scour/cable protection) leading to
	effects on fish and shellfish receptors by creating reef habitat





ES Chapter	Impacts Considered
Chapter 14: Con	nmercial Fisheries
Table 14.4	Complete loss or restricted access to traditional fishing grounds due to due to the presence
	of turbines, cable protection and scour protection
Table 14.4	Obstacles on the sea bed post construction due to the presence of turbines, cable
	protection and scour protection
Table 14.4	Interference with fishing activities due to the presence of turbines, cable protection and
	scour protection
Table 14.4	Displacement of fishing activity into other areas due to the presence of turbines, cable
	protection and scour protection
Chapter 17: Offs	shore Archaeology and Cultural Heritage
Table 17.16	Direct impact to potential heritage assets from cable repairs and Seabed contact by legs of
	jack-up vessels and / or anchors (maintenance)
Table 17.16	Indirect impact to heritage assets from changes to physical processes such as tidal current,
	waves, and Seabed morphology and sediment transport along array, interconnector and
	offshore export cables
Table 17.16	Impacts to the setting of heritage assets and historic seascape character due to the presence
	of wind farm infrastructure and activities associated with operations and maintenance





5 SUMMARY

- 28.33. Norfolk Vanguard Limited considers that details pertaining to the type, quantity and location of scour and cable protection have been specified within the Project Description (Volume 1, Chapter 5) to a sufficient extent to allow assessment of potential impacts within relevant offshore ES chapters. It is noted that the specification of cable and scour protection within the project envelope enables a required level of flexibility to be retained in the final engineering of these aspects. In consideration of this flexibility, the assessments presented in the ES are based upon the worst case scenario relevant to a given potential impact, as drawn from the project envelope and presented in the relevant offshore ES chapter. Impacts were assessed as negligible or minor significance (i.e. not significant) based on the worst case scenario at the time of the DCO submission. The worst case scenarios have been further refined, as presented in Sections 2 and 3 of this plan and therefore the impacts would be the same or less than presented in the ES (i.e. negligible or minor significance; not significant) based on the refined scenarios.
- 29.34. It should be noted that volumes of scour protection and cable protection are controlled within the DCO (see Schedule 1, Part 3, Requirement 5) and in the DMLs (Part 4, Condition 3). DCO Schedules 9 and 10 condition 14(1)(e) and Schedules 11 and 12 condition 9(1)(e) of the DMLs requires that the final Scour Protection and Cable Protection Plan must be agreed with the MMO.