



THE PLANNING ACT 2008
THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE)
RULES 2010

NORFOLK VANGUARD OFFSHORE WIND FARM

Planning Inspectorate Reference: EN010079

Secretary of State Additional Information Request

**Natural England's advice on All other matters raised in Secretary of
State letter dated 11th October 2021**

19th November 2021

Annex 8 - Natural England's advice on All other matters

Section 1: Secretary of State letter dated 11th October 2021

1. 6(ii)(a) Modifications to mitigate impacts from cable protection

During the Norfolk Boreas examination Vattenfall committed to no cable protection in areas to be managed as reef and only using cable protection which can be decommissioned, both of which NE would welcome being adopted by the Norfolk Vanguard projects to reduce the risk of an adverse effect on integrity.

2. 6(ii)(b) Avoiding Annex I reef

The avoidance of Annex I reef was thoroughly scrutinised during the Norfolk Boreas Examination. Natural England confirms that our advice remains applicable for both Norfolk Boreas and Norfolk Vanguard projects and refer the Secretary of State to REP4-043 of the Boreas examination where Natural England advice is set out in full.

3. 8 Dillington Hall Estate

Dillington Hall Estate is a key part of the Wendling Beck Nature Recovery Project (NRP). This is a collaborative, landscape-scale nature recovery project supported by Natural England and various environmental NGOs. This project has been in the planning phase for the past 2 years and will form a strategic project for pioneering the concept of taking land out of intensive production to deliver 'nature-based solutions'. The Dillington Hall Estate part of this project will be impacted by a section of the Vattenfall Boreas and Vanguard cable routes which will ultimately occupy the same working corridor.

The project has been aware of the Vattenfall cable route since before the Wendling Beck project was conceived, and as such built the cable path into the design of the project. In the long-term it is envisaged that the cable route will form a huge 'green lane' that will be used to move livestock across the project area. It will also form an important connected corridor for wildlife with high hedges blending into scrub and

woodland. However, during the extended timeframe for the determination of the Vattenfall projects, the Wendling Beck NRP has been accelerated. As such the landowners and Natural England will now need to work closely with Vattenfall to ensure that this accelerated program and associated change in the underlying land use is fully considered as part of any future construction. Natural England notes that the Outline Code of Construction Practice (OCoCP) and the Outline Landscape Environmental Management Scheme (OLEMS) have a range of consultation and mitigations already secured that should be sufficient to ensure that the mitigation needed is consulted upon and approved prior to the works. This also includes consultation with the landowners.

Additionally, Natural England has highlighted to the Applicant that Biodiversity Net Gain credits can be obtained from this project and that, while there is no current legal requirement to provide net gain for NSIP projects, participation could help future proof the developments against any legislative changes as well as help demonstrate and enhance the positive effect of the projects to local stakeholders and residents.

Section 2: 21 October 2021 - Norfolk Boreas comments on Natural England previous advice

For the avoidance of doubt Natural England wishes to provide further clarification on points raised by Norfolk Boreas on 21st October 2021 in relation to previous Natural England advice.

- Raising new issues/changing advice: Natural England notes that in Table 1.1 of Boreas's response to interested party representations document highlights changes to Natural England's advice and refers to the raising of new issues in relation to HHW SAC post examination. Natural England observes that as the Applicant's project design and implementation plans evolve (including altogether new elements such as alternative compensatory measures), so does our advice in response, because these project changes can and will inevitably pose new threats to designated site features, and alternative compensation measures engage new issues around effectiveness and implementation. In addition, over time our understanding of potential risks and issues is also developing, as we learn lessons from other projects being implemented which becomes the best available evidence regarding impacts, which is then reflected across all projects in our advice.

- Compensation after damage: We believe Norfolk Boreas may have misread our advice as potentially sanctioning the implementation of compensatory measures after the damage has occurred, without reading the associated caveats. Please see the advice provided in this response, where we have endeavoured to either emphasise the caveats and/or demonstrate that the submissions of the Norfolk Boreas and Norfolk Vanguard projects have not overcome them.