

From: [Gibson, Alan](#)
To: [Norfolk Vanguard](#)
Cc: [Ziauddin, Zara](#)
Subject: Natural England response to the Norfolk Vanguard Non Material Change consultation
Date: 29 August 2023 12:06:43
Attachments: [Picture \(Device Independent Bitmap\) 1.jpg](#)

Dear Sir/ Madam,

Thank you for your consultation on the Non-Material Change request for the Norfolk Vanguard project. Natural England has reviewed the request and the associated documents and has provided our full comments below for your consideration,

Summary

In principle Natural England believes that the proposed changes are unlikely to have a significant impact on nature conservation. However, inconsistencies within the documents about the project design means we are unable to advise with certainty. We have included the details below where clarification is required. Please note that these are in addition to those raised by the SoS in their letter dated 21 July 2023

Detailed comments

1. Paragraph 16 of the 'Supporting Statement for increase in ducts and drills at Landfall' identifies that cable protection would be in the form of concrete mattresses or rock protection. However, throughout Table 2 of the same document it specifically states that 'rock protection' will not be used. This is something to which Natural England would support given the removal challenges associated with rock protection. Therefore, please could it be confirmed that Rock protection will not be used?
2. There is no discussion in regards to increases in the potential area and volume of cable protection within the near shore and the potential for this to disrupt sediment transport. Please could evidence be provided to support conclusions?
3. Duct diameter in the text is reduced down to 600mm, but in the table it is set as 500m. Please would the Applicant clarify which duct size is now correct?
4. Throughout the 'Supporting Statement for increase in ducts and drills at Landfall' it is stated that 0.7% increased area of impact from cable installation is not significant, but there is no consideration of the sensitivity of the habitat and that which will be impacted where the increased area of impact will be occurring and implications for its supporting habitat functionally for mobile interest features from designated sites. The statement should be updated to consider the sensitivity of the habitat being impacted as well as the area.
5. It is not clear from the text and the tables and the response to the Secretary of State's queries the exact distance from shore the cables will be unbundled. For example the table on page 21 states 'The NMC will only affect the nearshore area (within 2km of the coast)', which is not specific. Through reading other sections it seems that the cables are likely to be unbundled 750m from the exit pits, but the exit pits could be between 750 and 1000m from coast. More detail on this would be welcomed.

Regards

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