

From: [Brown, Emma \(NE\)](#)
To: [Hornsea Project Three](#)
Cc: [Burton, Louise \(NE\)](#)
Subject: Natural England Deadline Three Submission for Hornsea Project Three
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Attachments: [EN_10080_NE_Hornsea_Project_three_Deadline_3_Submission_-_ISH_4.pdf](#)
[EN_10080_NE_Hornsea_Project_three_Deadline_3_Submission_-_ISH_1_\(002\).pdf](#)
[EN_10080_NE_Hornsea_Project_Three_Deadline_3_Submission_-_ISH_2_PART_1_-_Ornithology.pdf](#)
[HP00066_101_HOW03_HiDef_Method_statement_20160401.pdf](#)
[EN_10080_NE_Hornsea_Project_Three_Deadline_3_Submission_-_ISH_2_PART_2_-_Benthic.pdf](#)
[EN_10080_NE_Hornsea_Project_Three_Deadline_3_Submission_-_ISH_2_PART_2_-_Benthic_Annex_2.2B_Response_on_REP2-004.pdf](#)
[EN_10080_NE_Hornsea_Project_Three_Deadline_3_Submission_-_ISH_3_.pdf](#)

Hello,

Please find attached Natural England's Deadline Three Submission.

This includes the following documents:

- EN 10080 NE Hornsea Project Three Deadline 3 Submission - ISH 1
- EN 10080 NE Hornsea Project Three Deadline 3 Submission - ISH 2 PART A – Ornithology
- HP00066_101_HOW03_HiDef_Method_statement_20160401 (Submitted as appendix 5 of ISH 2 Part 1)
- EN 10080 NE Hornsea Project Three Deadline 3 Submission - ISH 2 PART 2 – Benthic
- EN 10080 NE Hornsea Project Three Deadline 3 Submission – ISH 2 PART 2 – Benthic Annex 2.2A – Review of Applicant's response to IP response to ExA Questions – Benthic Ecology
- EN 10080 NE Hornsea Project Three Deadline 3 Submission – ISH 2 PART 2 – Benthic Annex 2.2B – Response on REP2-004
- EN 10080 NE Hornsea Project Three Deadline 3 Submission - ISH 3
- EN 10080 NE Hornsea Project Three Deadline 3 Submission - ISH 4

Kind regards,

Emma

Emma Brown
Marine Senior Adviser
Yorkshire & Northern Lincolnshire
Natural England
Lateral, 8 City Walk, Leeds, LS11 9AT
T: 02080268543 M:07787 004 883

Please note I currently work Monday - Thursday

<http://www.gov.uk/naturalengland>

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

HORNSEA PROJECT THREE OFFSHORE WIND FARM

Planning Inspectorate Reference: EN010080

NATURAL ENGLAND
WRITTEN SUBMISSION FOR DEADLINE 3

Dated 14th December 2018

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INTRODUCTION

1. This submission follows the 4th Issue Specific Hearing on Other onshore matters for Hornsea Project 3 which took place at Mercure hotel Norwich, on the 7th December 2018 and details the oral responses to questions asked of Natural England during that hearing.

2. This submission consists of a written response on Agenda item 8 on landscape and visual impacts and Natural England outstanding concerns in relation to potential impacts to the character and setting of the Norfolk Coast Area of Outstanding Natural Beauty (AONB). Natural England notes that there was insufficient time within the Issue Specific Hearing to explore this matter so we are providing our comments as a written submission.

WRITTEN SUBMISSION OF THE ORAL ANSWERS PROVIDED TO QUESTIONS AT THE ISSUE SPECIFIC HEARING ON Friday 7th DECEMBER 2018.

Representing Natural England: Louise Burton, Emma Brown

NE response to additional evidence contained in the Applicant's Appendix 23 to Deadline 1 submission – Impacts on the Qualities of the Natural Beauty of the Norfolk Coast AONB

In respect of the likely adverse effects on special quality 'Exceptionally Important, Varied and Distinctive Biodiversity, based on Locally Distinctive Habitats' (number 4).

1. We thank the applicant for the additional information provided within Appendix 23. This goes some way to answering Natural England's desire for further information about the impact of the cable corridor on the special qualities (expressed as Qualities of Natural Beauty [QNB] in the AONB Management Plan) of the Norfolk Coast AONB which we requested in our Relevant Representation, reproduced here:

It is Natural England's view that there is insufficient information in the application to determine impact from the onshore cable corridor on special qualities of the Norfolk Coast Area of Outstanding Natural Beauty (AONB). A key special quality of the Norfolk Coast AONB is 'Exceptionally Important, Varied and Distinctive Biodiversity, based on Locally Distinctive Habitats'. A key characteristic of the landscape character type Coastal Towns and Villages, CTV1: Weybourne to Sheringham within Norfolk Coast AONB is 'Small fields, hedgerows and woodland, which provide an enclosed structure for this intimately scaled rural landscape'. Natural England would expect to see a detailed analysis of the impacts on key landscape elements within the AONB which contribute to biodiversity and landscape character, such as hedgerows and woodland and other semi-natural habitats. At this present time the ES does not include information about where there will be a long term/persistent loss of key landscape features, such as veteran trees and important hedgerows within the AONB, and there is no detail provided of the steps that have been taken to minimise the loss.

2. *In addition to the impact of the cable route, the construction impacts of any joint bays, link boxes, compounds etc. within the AONB should be assessed in full.*

At the this time we advise that;

Whilst the additional information in Appendix 23 is helpful Natural England is disappointed that there is little extra information about the duration of the construction effects, particularly as information was forthcoming in the Issue Specific Hearing session of Tuesday 4th and Friday 7th December 2018. The proposed 2 phase construction period (with a maximum of 3 years between phases) will significantly extend the duration of the construction effects and, as a consequence, the time needed for the phase 2 reinstatement planting to sufficiently mature will be extended.

3. Taking all of this new information into account and with reference to other information contained with the ES¹ which details the construction phase of the cable route **Natural**

¹ Given the limited spatial extent of the onshore cable corridor in relation to these designated areas and the nature of potential effects (i.e. short-term construction activity followed by landscape reinstatement) it is

England considers that the effects associated with the construction phase will have a significant effect on the landscape fabric and visual amenity afforded by this part of the AONB.

Therefore, impacts to the AONB remain an outstanding concern unless potential enhancement opportunities during construction can be addressed as set out below

Our advice is based upon the following;

- Duration of the construction phase(s). We do not judge the effects of the construction phase(s) to be short term, but rather to be medium term at best (5 to 10 years) and potentially long term (10 years and beyond). The use of a two stage phased build programme, which will require the removal of the restoration planting from phase 1 in order to facilitate phase 2, will significantly extend the construction phase and hence the period of adverse effect. We note that other cabling schemes such as East Anglia One have factored in the need for the installation of additional cable capacity for East Anglia three at the initial construction phase in order to limit the damage to the natural environment, and disturbance to other receptors, and in the case of the former limit the period needed for reinstatement measures to fully establish. Natural England understands why the applicant is reluctant to take this approach for Hornsea Project Three, but it is our view that this approach is still viable mitigation and therefore should not be dismissed.
 - The growth rate of vegetation used in hedgerow and hedgerow tree reinstatement planting. Norfolk County Council have advised us that due to the exposed nature of the landscape in north Norfolk the growth rate at which the hedgerow plants will take to reach a stage where their effectiveness as mitigation measures is achieved should be doubled from 5 to 10 years.
 - Following on from the above; Natural England is concerned about the loss of the initial reinstatement planting due to 2nd construction phase. As stated during the issue specific hearing of Friday 7th December 2018 the reinstated planting would need to be removed for phase 2 and replanted again afterwards. The effect of this would be to extend the duration of the adverse effects of the construction period from at least 6 years (1 years construction, 5 years awaiting the reinstated vegetation to mature) to potentially at least 9 years (4 and 5 years respectively).
 - Whilst we accept that the reinstatement planting will help to moderate the effects associated with the operational phase of the proposal they do nothing to moderate the effects of the construction phase. We note that there is no difference between the reinstatement measures proposed for the landscape outside of the AONB and that within the AONB and would therefore like to see measures put in place which will provide a long term net environmental gain for the AONB.
4. Natural England welcomes the use of Horizontal Directional Drilling (HDD) under woodland blocks and selected hedgerows. However, there will still be an extensive loss of hedgerows and hedgerow features as a result of the cable laying. The

unlikely that construction of the onshore cable corridor would undermine the special qualities or reasons for designation of these landscapes. Significant effects are therefore not anticipated (APP-076 paragraph 4.7.5.2)

reinstatement planting will address this loss, but in order to minimise the duration of this adverse effect the construction phase needs to be as short as possible.

5. The National Policy Statement for National Networks states at 5.151 (p.77) that '*the extent to which that (the detrimental effect) could be moderated*' is consideration for the decision maker. Natural England advises that whereas the moderation measures for the operational phases of the scheme are adequate those for the construction phase(s) are not. We advise therefore that there is an opportunity to provide imaginative landscape enhancement, such as the strengthening of existing landscape features along the course of the route, which would compensate for the significant effects that the scheme will cause during the construction period and result in a net gain for the AONB. This would support the statutory purposes of the AONB, to conserve and enhance the natural beauty of the designation and is in accord with the objectives set out in Natural Environment White Paper and 25year Environment Plan. This would also be in line with other undergrounding schemes through designated landscapes such as the National Grid Viking Link scheme (currently awaiting final determination following a Public Inquiry) and the Wormington to Sapperton gas pipeline, another National Grid scheme².

²http://news.bbc.co.uk/local/gloucestershire/hi/people_and_places/nature/newsid_8762000/8762307.stm