

From: [Brown_Emma](#)
To: [Hornsea Project Three](#)
Subject: EN010080 Hornsea Project 3: Deadline 7 Submission from Natural England
Date: 15 March 2019 00:02:45
Attachments: [EN010080 Hornsea Project Three Deadline 7 - Natural England - ANNEX C - Cable Protection Advice Note.pdf](#)
[EN010080 Hornsea Project Three Deadline 7 - Natural England - ANNEX D - Note on Small Scale Impact.pdf](#)
[EN010080 Hornsea Project Three Deadline 7 - Natural England - ANNEX E - Ornithology Response.pdf](#)
[EN010080 Hornsea Project Three Deadline 7 - Summary of Natural England's Advice on Cromer Shoal MCZ.pdf](#)
[EN010080 Hornsea Project Three Deadline 7 - Summary of Natural England's Advice on Markham's Triangle pMCZ.pdf](#)
[EN010080 Hornsea Project Three Deadline 7 - Summary of Natural England's Advice on North Norfolk Sandbanks and Saturen Reef SAC.pdf](#)
[EN010080 Hornsea Project Three Deadline 7 Natural England's comments on the RIES .pdf](#)
[JNCC Report_598_Revised-2018_WEB - Monitoring guidance for marine benthic habitats.pdf](#)
[Natural England and JNCC joint Technical Guidance Note - Marine Buffers and Margins - Final.pdf](#)
[NECR164 Non-breeding season populations of seabirds in UK waters.pdf](#)
[SNCB response to MSS avoidance rate report_FINAL_251114.pdf](#)
[EN010080 Hornsea Project Three Deadline 7 - Natural England - ANNEX A - Further Advice on PTA REP5 - 010.pdf](#)
[EN010080 Hornsea Project Three Deadline 7 - Natural England - ANNEX B - Sabellaria Spinulosa Advice Note.pdf](#)
[EN010080 Hornsea Project Three Deadline 7 - Natural England - Rule 17 Response.pdf](#)
[Natural England and JNCC joint Technical Guidance Note - Marine Buffers and Margins - Final.pdf](#)

Good Evening,

Please find attached Natural England's Deadline 7 Response.

This includes:

- Comments on the RIES
- Rule 17 Response
- ANNEX A: Further Advice on PTA REP 5 – 010
- ANNEX B: Sabellaria Spinulosa Advice Note
- ANNEX C: Cable Protection Advice Note
- ANNEX D: Note on Small Scale Impact
- ANNEX E: Ornithology Response
- Summary of Natural England's Advice on Cromer Shoal MCZ
- Summary of Natural England's Advice on Markham's Triangle pMCZ
- Summary of Natural England's Advice on The Wash and North Norfolk Coast SAC
- Summary of Natural England's Advice on North Norfolk Sandbanks SAC
- Natural England & JNCC joint Technical Guidance Note – Marine Buffers and Margins
- SNCB response to MSS Avoidance Rate Report
- NERC164
- JNCC Report 598

Please note that Natural England has reviewed the MMO's draft Response to the ExA dDCO/DML and are in agreement with their comments. Therefore we will not be providing a separate response on this occasion.

Kind regards,

Emma

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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 7

Summary of Natural England's Advice on Cromer Shoal Chalk Beds MCZ

14 March 2019

		<p>The Applicant has presented figures of the area of each feature within the MCZ which they consider will be impacted by the operations, however there is still some uncertainty about the depth of the layer of sand at the exit pit locations and the potential for other features to be present and/or impacted from the disposal activities; especially in relation to the cofferdams</p> <p>Just because it is small scale impact doesn't mean it is not insignificant. But currently the evidence in relation to this and the amount of cable protection required in the site which would potentially result in a permanent change in habitat is uncertain.</p> <p>The disposal locations have also not been assessed.</p> <p>Issues raised in relation to the RIES are also pertinent for the MCZ in relation to colonisation of cable protection, decommission of cable protection, sand wave levelling and understanding the significance of the impacts in terms of temporary/permanency and recoverability of the site. With a predicted 191200 m² temporary impact to the MCZ. However, this is not fully linked the conservation objectives of the site and the vulnerability of the features.</p>
4.1	Measures of Equivalent Environmental Benefit	<p>As highlighted above, Natural England currently unable to provide definitive advice on the significance of the impact on the features of the designated site.</p> <p>There is currently no formal guidance in relation to Measures of Equivalent Environmental Benefit (MEEB) and there and there have been no other cases that have reached this stage. Therefore, should the SoS conclude that MEEB are required, this case would be precedent setting.</p> <p>In the absence of guidance/experience to draw upon, we would recommend that discussions relating to MEEB include input from the SNCBs, Regulatory Agencies (i.e. MMO and BEIS) and Defra.</p>
5.1	Summary	Natural England questions the conclusions of the MCZ assessment for the Cromer Shoal Chalk beds and believes there is sufficient uncertainty in relation to the impacts to the features and coastal processes, and recoverability of the features, to have limited confidence in the Stage 1 conclusion that there will be no significant risk of HOW03, hindering the achievement of the conservation objectives for the Cromer Shoal MCZ.