Vattenfall Wind Power Ltd

Thanet Extension Offshore Wind Farm

Annex A to Appendix 3 to Deadline 5 Submission: Applicant's response to Natural England's Representation

Relevant Examination Deadline: 5

Submitted by Vattenfall Wind Power Ltd

Date: April 2019

Revision A

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Approved By:	Daniel Bates
Date of Approval:	April 2019
Revision:	A

Revision A	Original document submitted to the Examining Authority

Natural England Comment	Applicant response
Mitigation Reference 2.4 - The installation of cable protection is not necessarily the best mitigation from a physical processes perspective. From a physical processes perspective it may be better mitigation to leave a cable buried to a shallow depth and this should be considered. If the intention is to protect the cable from external impacts then this should be clearly stated.	The Applicant notes this response however would note that the reference to cable protection provided within the physical processes chapter (Application Ref 6.2.2) it is confirmed that the most appropriate design will be chosen through reference to *inter alia* seabed current data for locations where burial depth cannot be achieved. Where burial depth cannot be achieved the Applicant notes that dependent on the seabed current there is an increased risk of scour around the cable, and therefore loss of sediment and/or development of scour pits. In this context the Applicant considers the application of cable protection to be a suitable mitigation measure.
Mitigation Reference 2.5 – Natural England do not agree that scour protection should be installed around turbine foundations if its primary aim is to reduce turbidity and changes to seabed habitat as stated here. Installation of scour protection will in itself lead to changes to the seabed habitat and therefore from an ecological perspective we would wish to see further consideration of what the best option would be, whether that would be to install scour protection or not. We suggest that scour protection would in fact primarily be installed to ensure foundation integrity and therefore this text is currently misleading.	The Applicant notes this response however would note that the reference to cable protection provided within the physical processes chapter (Application Ref 6.2.2) it is confirmed that there remains a risk of a change of sediment type and increased turbidity as a result of allowing scour pits to form. The introduction of scour protection mitigates this risk and is therefore considered to be appropriate. The Applicant would further note that whilst the introduction of scour protection may also serve as protection for the asset it is not simply an 'either/or' scenario and the mitigation serves for both purposes.
Mitigation Reference 3.5 – Natural England echo our comments above in relation to mitigation reference 2.4. If the intention is to protect the cable from external impacts then this should be clearly stated.	The Applicant notes this comment and has responded to Natural England's initial response to Mitigation Reference 2.4.
Mitigation Reference 3.6 - Natural England echo our comments above in relation to mitigation reference 2.5. Installation of scour protection will in itself lead to changes to the seabed habitat and therefore from an ecological perspective we would wish to see further consideration of what the best option would be, whether that would be to install scour protection or not. We suggest that scour protection would in fact primarily be installed to ensure foundation integrity and therefore this text is currently misleading.	The Applicant notes this comment and has responded to Natural England's initial response to Mitigation Reference 2.5.
Mitigation Reference 5.2 – Minor point, however it could be argued that the biogenic reef plan is not embedded mitigation. The plan has been	The Applicant notes this response and can confirm that the plan was drafted through the EIA Evidence Plan in order to mitigate

Natural England Comment	Applicant response
developed throughout the evidence plan process and is to avoid a specific impact.	impacts on biogenic reef. It is therefore considered appropriate mitigation that has been embedded in the proposed project consent application.
Mitigation Reference 5.5 – Natural England do not agree that use of cable protection is mitigation for benthic and subtidal ecology unless the applicant is specifically referring to Electro-magnetic Fields (EMF) which is not clear here. As stated previously we do not agree that cable protection should be used as default to mitigate EMF impacts as it may greater associated impacts.	The Applicant notes that the critical factor in impacts from EMF is distance between the source and the receptor. In this context cable protection will have a secondary impact through reduction of EMFs and mitigating the effect at the specified locations. Cable protection in this context, whilst not primarily deployed to mitigate the effect is considered to have a net benefit of reducing the impact and therefore mitigating it.
Mitigation Reference 8.4 – 8.6 – Minor point, however as stated above, it could be argued these are not embedded mitigation as these are plans which have developed throughout the evidence plan process to avoid a specific impact.	The Applicant notes that Natural England agree the plans aid in avoiding a specific impact. The Applicant considers that in this context the MMMP (Marine Mammal Mitigation Protocol) is an appropriate form of mitigation which mitigates and avoids a specific impact, in this case disturbance of marine mammals during noisy activity.