

Norfolk Boreas Offshore Wind Farm

Consultation Report

Appendix 13.9 Natural England response to Benthic and Contaminant sample analysis report

Applicant: Norfolk Boreas Limited
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Photo: Ormonde Offshore Wind Farm

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Our ref: 10570 Consultation 229400
Your ref: PB5640-103-001



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BY EMAIL ONLY

Dear David Tarrant,

Norfolk Boreas Offshore Wind Farm (OWF): Initial benthic and contaminant analysis

Thank you for your consultation dated 23 October 2017 regarding the initial benthic and contaminant sample analysis. The following constitutes Natural England's formal response under our Discretionary Advice Service (DAS).

Natural England are content that the initial benthic sample analysis provides validation that the Zonal Environmental Assessment (ZEA) benthic data is applicable for use in the Norfolk Boreas EIA. We also note that while the ZEA did not survey the export cable route, the project is following a route adjacent to that for the Norfolk Vanguard OWF project for which survey data was collected in 2016. We note that *Sabellaria spinulosa* was found to be present at site 5 and 14, but further analysis confirmed that it was not present in a reef formation considered to be Annex I habitat. The aggregations found were either classed as 'not reef' or 'low reef' (as defined by Gubbay 2007). We acknowledge that this is in line with the original ZEA data from 2011, which recorded the presence of *Sabellaria spinulosa* as one of the top ten most common species recorded throughout the zone and was found in clumps and reef in the ZEA data. It is unclear what reef classification (i.e. not reef, low reef, medium reef or high quality reef) the reefs from the ZEA 2011 were and as such we advise that the standard benthic pre-construction surveys would be necessary to inform the need for any micro-routing around Annex I Habitats nearer the time of construction. Overall we acknowledge that the 2011 ZEA data will be 8 years old by the time the DCO is submitted (anticipated to be 2019), but given that this survey has confirmed the validity of the ZEA benthic survey and presence of *Sabellaria spinulosa* we are in agreement that no further benthic surveys are required prior to the EIA for the Norfolk Boreas site.

Once Natural England has reviewed the Preliminary Environmental Information report (PEIr) we will be better able to advise Vattenfall Boreas team on the potential nature conservation risks associated with large areas of potential Annex I *Sabellaria spinulosa* reef along the export cable route which reduce availability for micro-siting.

We acknowledge and welcome that the project exceeded the agreed scope by doubling the number of contaminant samples from 5 to 10. The level of contamination is sufficiently low and generally within Cefas Action Level 1 limits (two out of the ten samples for marginally exceeded the Cefas Action Level 1 limits for arsenic) not to be of concern to Natural England.

For any queries relating to the content of this letter please contact me using the details provided below.

Yours sincerely,



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Norfolk and Suffolk Team

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