

Norfolk Boreas Offshore Wind Farm In Principle Norfolk Boreas Southern North Sea Special Area of Conservation (SAC) Site Integrity Plan

DCO Document 8.17

Applicant: Norfolk Boreas Limited
Document Reference: 8.17
Pursuant to APFP Regulation: 5(2)(q)

Date: June 2019
Revision: Version 1
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Photo: Ormonde Offshore Wind Farm

Date	Issue No.	Remarks / Reason for Issue	Author	Checked	Approved
04/04/2019	01D	First draft for Norfolk Boreas Limited review	JL/ GS	DT/ JL/VR/JL	AD
24/04/2019	02D	Second draft for Norfolk Boreas Limited review	JL/ GS	DT/VR	PP
17/05/2019	03D	Third draft for Norfolk Boreas Limited review	JL/ GS	DT/VR	JL
22/05/2019	01F	Final for DCO submission	JL/GS	DT/ VR	JL

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Glossary of Acronyms

AA	Appropriate Assessment
ADD	Acoustic Deterrent Device
AEOI	Adverse Effect on Integrity
COs	Conservation Objectives
cSAC	Candidate Special Area of Conservation
DCO	Development Consent Order
DML	Deemed Marine Licence
EPP	Evidence Plan Process
EPS	European Protected Species
ES	Environmental Statement
ETG	Expert Topic Group
FCS	Favourable Conservation Status
FEED	Front End Engineering Design
FID	Financial Investment Decision
HDD	Horizontal Directional Drilling
HRA	Habitats Regulations Assessment
JNCC	Joint Nature and Conservation Committee
km	Kilometre
km ²	Kilometre squared
LiDAR	Light Detection and Ranging
LSE	Likely Significant Effect
MMO	Marine Management Organisation
MMMP	Marine Mammal Mitigation Plan
MU	Management Unit
NS	North Sea
PTS	Permanent Threshold Shift
SAC	Special Area of Conservation
SIP	Site Integrity Plan
SNCBs	Statutory Nature Conservation Bodies
SNS	Southern North Sea
TWT	The Wildlife Trust
UK	United Kingdom
UXO	Unexploded Ordnance
VWPL	Vattenfall Wind Power Limited
WDC	Whale and Dolphin Conservation

Glossary of Terminology

Array cables	Cables which link wind turbine to wind turbine, and wind turbine to offshore electrical platforms.
Interconnector cables	Offshore cables which link offshore electrical platforms within the Norfolk Boreas site
Landfall	Where the offshore cables come ashore at Happisburgh South
Norfolk Boreas site	The Norfolk Boreas wind farm boundary. Located offshore, this will contain all the wind farm array.
Offshore service platform	A platform to house workers offshore and/or provide helicopter refuelling facilities. An accommodation vessel may be used as an alternative for housing workers.
Offshore cable corridor	The corridor of seabed from the Norfolk Boreas site to the landfall site within which the offshore export cables will be located.
Offshore electrical platform	A fixed structure located within the Norfolk Boreas site, containing electrical equipment to aggregate the power from the wind turbines and convert it into a suitable form for export to shore.
Offshore export cables	The cables which transmit power from the offshore electrical platform to the landfall.
Offshore project area	The area including the Norfolk Boreas site, project interconnector search area and offshore cable corridor.
Project interconnector cable	Offshore cables which would link either turbines or an offshore electrical platform in the Norfolk Boreas site with an offshore electrical platform in one of the Norfolk Vanguard sites.
Project interconnector search area	The area within which the project interconnector cables would be installed.
Scour protection	Protective materials to avoid sediment being eroded away from the base of the foundations as a result of the flow of water.
The Applicant	Norfolk Boreas Limited
The project	Norfolk Boreas Wind Farm including the onshore and offshore infrastructure.

1 INTRODUCTION

1.1 Purpose of this document

1. The purpose of the In Principle Norfolk Boreas Southern North Sea (SNS) Special Area of Conservation (SAC) Site Integrity Plan (hereafter 'the SIP') is to set out the approach for Norfolk Boreas Limited to deliver potential mitigation measures for Norfolk Boreas, to ensure the avoidance of Adverse Effect on Integrity to the designated features of the Southern North Sea SAC.
2. The final SNS SIP is to be submitted for approval as required under the Development Consent Order (DCO) Condition 14(1)(m) of Schedules 9 and 10 (the Generation Deemed Marine Licences (DMLs) and Condition 9(1)(l) of Schedules 11 and 12 (the Transmission DMLs). These state:

In the event that piled foundations are proposed to be used, the licensed activities, or any phase of those activities must not commence until a site integrity plan which accords with the principles set out in the in principle Norfolk Boreas Southern North Sea Special Area of Conservation Site Integrity Plan has been submitted to the MMO and the MMO is satisfied that the plan, provides such mitigation as is necessary to avoid adversely affecting the integrity (within the meaning of the 2017 Regulations) of a relevant site, to the extent that harbour porpoise are a protected feature of that site.

3. The approach and measures listed in the In Principle SIP are in relation to the Norfolk Boreas project only and are in response to the conclusions of the Information to Support Habitats Regulations Assessment Report (document reference 5.3 of this Development Consent Order (DCO) application). The Information to Support HRA Report concluded that, subject to the final design of Norfolk Boreas and the actual in combination scenario that overlaps with Norfolk Boreas, further mitigation and management measures may be necessary in relation to the potential in combination effects of pile driving noise in order to ensure there will be no adverse effect beyond reasonable scientific doubt on the SNS SAC.
4. Following completion of the Appropriate Assessment (AA) by the Competent Authority, it is acknowledged that the Norfolk Boreas SNS SAC SIP may require revision to reflect the conclusions of the AA, the final design of Norfolk Boreas and the actual in combination scenario for offshore wind farm projects that could be constructing at the same time as Norfolk Boreas. The mitigation and management measures that may need to be secured in the SIP post-consent and pre-construction will be based on the AA as well as the final design of Norfolk Boreas, in relation to the potential in combination effects of pile driving noise in order to ensure there will be no adverse effect beyond reasonable scientific doubt on the SNS SAC.

5. The SIP provides a framework for further discussion and consultation by Norfolk Boreas Limited with the Marine Management Organisation (MMO) and other relevant stakeholders, including Statutory Nature Conservation Bodies (SNCBs), post-consent and pre-construction to agree the exact details of any required project related management measures. Indicative mitigation measures are outlined in this In Principle SIP which would be developed in consultation with the MMO and other relevant bodies (see section 2.3), post consent and pre-construction based on the final design of Norfolk Boreas.
6. It is also possible that mitigation and management measures will be required for other plans and projects located within the vicinity of the project as part of the in combination HRA, however, it is not possible for Norfolk Boreas Limited to detail what these will be or how they will be secured and is therefore outside of the scope of the Norfolk Boreas SNS SAC SIP.
7. At the time of writing (April 2019; see Chapter 7 technical consultation for further detail on cut off dates for new information to the Norfolk Boreas application), the management measures for the SNS SAC site are yet to be confirmed. As such, the SIP should be considered as In Principle until further guidance from the Joint Nature and Conservation Committee (JNCC) and Natural England is provided. In its final form, the SIP will include updated information on management measures for the SNS SAC and final design of the project.

1.2 Project Background

8. Norfolk Boreas Limited (an affiliate company of Vattenfall Wind Power Ltd (VWPL), 'the Applicant') is proposing to develop Norfolk Boreas (hereafter 'Norfolk Boreas' or 'the project'), an offshore wind farm in the southern North Sea.
9. Norfolk Boreas comprises the Norfolk Boreas site, within which the wind farm array will be located. The offshore wind farm will be connected to the shore by offshore export cables installed within the offshore cable corridor from the wind farm to a landfall point at Happisburgh South, Norfolk. From there onshore cables would transport power over approximately 60km to the onshore project substation near to Necton, Norfolk. A full project description is given in the Environmental Statement (ES), Chapter 5 Project Description.
10. Once built, Norfolk Boreas would have an export capacity of up to 1,800MW, with the offshore components comprising:
 - Wind turbines;
 - Offshore electrical platforms;
 - Offshore Service platform;
 - Met masts;

- Measuring equipment (LiDAR and wave buoys);
 - Array cables;
 - Interconnector cables or project interconnector cables¹; and
 - Export cables.
11. The key onshore components of the project are as follows:
- Landfall;
 - Onshore cable route, accesses, trenchless crossing (e.g. Horizontal Directional Drilling (HDD)) zones and mobilisation areas;
 - Onshore project substation; and
 - Extension to the Necton National Grid substation and overhead line modifications.
12. Vattenfall Wind Power Limited (VWPL) (the parent company of Norfolk Boreas Limited) is also developing Norfolk Vanguard, a ‘sister project’ to Norfolk Boreas. Norfolk Vanguard’s development schedule is approximately one year ahead of Norfolk Boreas and as such the Norfolk Vanguard project is now under Examination.
13. Norfolk Vanguard may undertake some onshore enabling works for Norfolk Boreas, but these are not relevant to this document. Should Norfolk Vanguard proceed to construction Norfolk Boreas wish to maintain the option to connect to the Norfolk Vanguard project via a “project interconnector”. Further information on when a project interconnector may be required is provided in ES Chapter 5 Project description section 5.4.12).
14. As it is not yet known whether Norfolk Vanguard will obtain development consent or proceed to implementation and construction, the Norfolk Boreas application needs to seek consent to implement Norfolk Boreas as an independent project. Therefore, the Applicant has included two scenarios in the development consent application as follows:
- Scenario 1: Norfolk Vanguard and Norfolk Boreas are both delivered (with associated synergies), and Norfolk Vanguard carries out shared works, onshore to benefit Norfolk Boreas (Scenario 1).
 - Scenario 2: Only Norfolk Boreas is delivered; Norfolk Vanguard does not proceed to construction and Norfolk Boreas proceeds alone. Norfolk Boreas undertakes all works required as an independent project (Scenario 2).

¹ There may also be a requirement for cables to be placed within the project interconnector search area (Figure 5.1 of the ES) which would link the Norfolk Boreas project to the Norfolk Vanguard project (section 5.4.12 of ES Chapter 5 Project Description). Either “Interconnector cables” which would link platforms within the Norfolk Boreas site would be installed or “project interconnector cables” would be installed. Under no scenario would both be required.

15. Both scenarios have been considered when drafting this document, however the only difference between the two scenarios would be that under Scenario 1 the project interconnector could be required, whereas under Scenario 2 it would not be required as Norfolk Vanguard would not exist and therefore it would not be possible to connect to that project.
16. The Norfolk Boreas site is located approximately 73km from the closest point of the Norfolk Coast. The site covers an area of approximately 725km².
17. The detailed design of Norfolk Boreas (e.g. numbers of wind turbines, layout configuration, foundation type and requirement for scour protection) would not be determined until post-consent. Therefore, realistic worst-case scenarios in terms of potential impacts/effects are adopted to undertake a precautionary and robust impact assessment.
18. Within Norfolk Boreas, several different sizes of wind turbine are being considered in the range of 10MW and 20MW. In order to achieve the maximum 1,800MW export capacity, there would be between 90 (20MW) and 180 (10MW) wind turbines.
19. In addition, up to two offshore electrical platforms, an offshore service platform, two meteorological masts, two LiDAR platforms and two wave buoys, plus a network of up to 600km of offshore cables are considered as part of the worst-case scenario within the site.
20. Norfolk Boreas Limited is considering constructing the project in either a single phase of up to 1,800MW or in two phases (up to a maximum of 1,800MW). The layout of the wind turbines will be defined post consent.
21. The full construction window is expected to be up to three years for the full 1,800MW export capacity and offshore construction would be anticipated to commence around 2025. Chapter 5 Project Description provides indicative construction programmes for the single phase and two phase options.

1.3 The Southern North Sea SAC

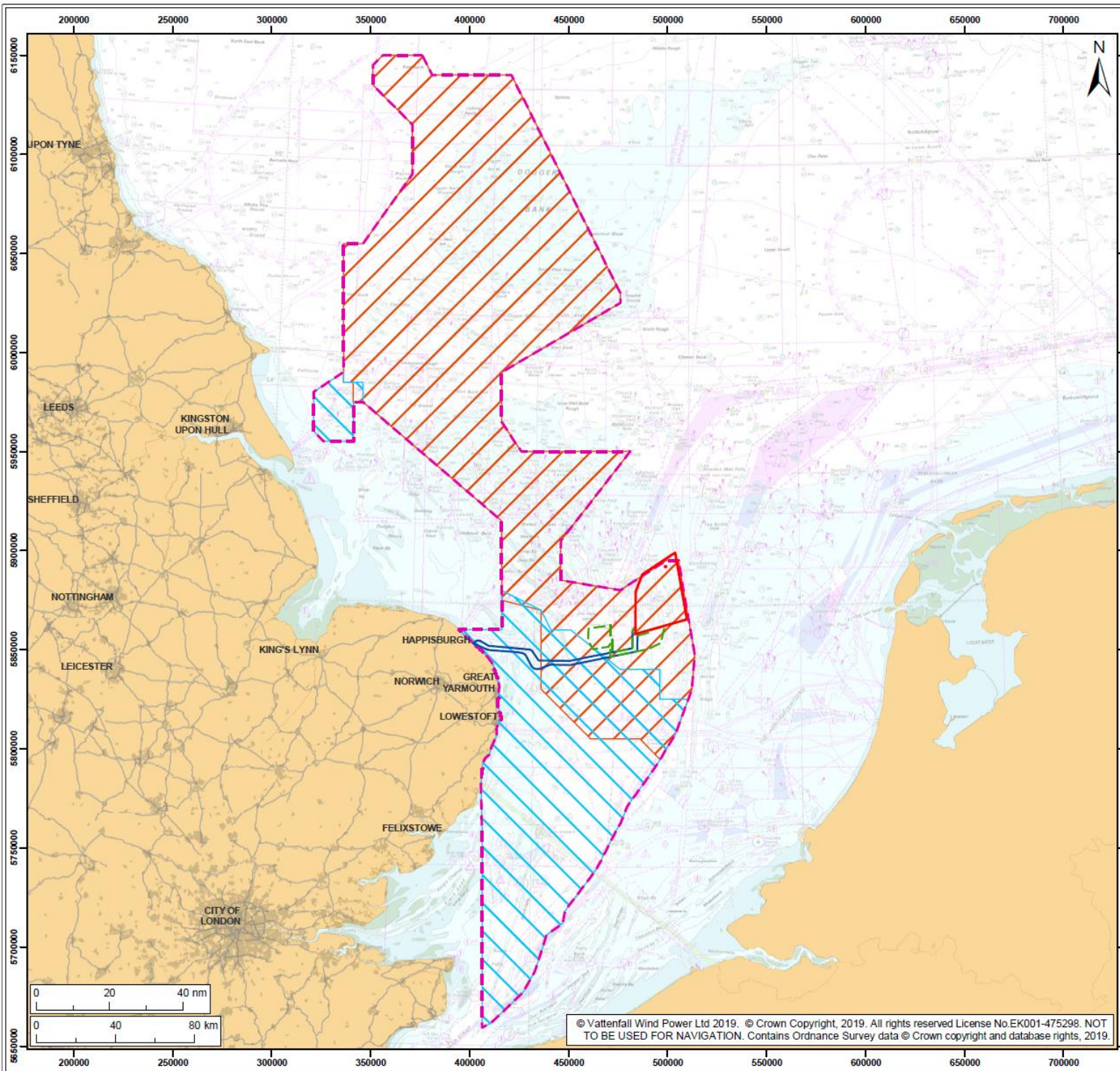
22. The Norfolk Boreas site is located within the Southern North Sea (SNS) Special Area of Conservation (SAC) summer area (Figure 1.1) and the offshore cable corridor is located within both the summer and the winter areas.
23. In January 2017, the SNS candidate Special Area of Conservation (cSAC) was submitted to the European Commission to become designated as a SAC. The site was designated as a SAC in February 2019 and therefore is referred throughout this document as the SNS SAC.







24. The SNS SAC is located within the Southern North Sea and wholly within the North Sea Management Unit (MU). Harbour porpoise *Phocoena phocoena* is the primary and only listed feature of the site.

25. Full details of the SNS SAC, including the Conservation Objectives (COs), are included in Section 3 of this document.

1.4 Requirement for this document

26. Due to the long lead in times for the development of offshore wind farms it is not possible to provide final detailed method statements for construction prior to consent and as a result, the detail of any required mitigation also cannot be agreed at this stage. The agreement of guiding principles to mitigation, through this In Principle SIP as part of consent, therefore permits the final mitigation to be specified post-consent and pre-construction as part of the detailed design and allows refinements to be made based on the best practice, available knowledge and technology at that time.
27. This In Principle SIP reflects the commitment of Norfolk Boreas Limited to undertake required measures to reduce the potential for any significant disturbance of harbour porpoise in the SNS SAC, whilst allowing scope for refinement of the measures through consultation once the management measures are available for the SNS SAC, and once final construction methods for the project have been confirmed. This will enable use of the most appropriate project related measures to be confirmed based on best knowledge, evidence and proven available technology at the time of construction.
28. A final detailed SIP will be produced prior to the commencement of pile driving, following revision and consultation as per the outline schedule in section 2.3.
29. Norfolk Boreas Limited acknowledge that any required mitigation or management measures should be precise, effective and deliverable in order to maintain the integrity of the SNS SAC for harbour porpoise. The SIP is designed to ensure that this will be the case once any required measures have been defined. Section 2.3 provides an outline of the proposed schedule for refinement and approval of the SIP.
30. Norfolk Boreas Limited believe that the SIP will secure the necessary mitigation within the DCO, whilst allowing scope for refinement of the precise mitigation measures to be adopted through consultation once final management measures are available for the SNS SAC, and once final construction methods for the project have been confirmed. This will enable use of the most appropriate project related measures to be confirmed based on best knowledge, evidence and proven available technology at the time of construction. This approach will also remove the need to revise the DML condition should the most suitable measures to be adopted change between the time of consent and construction.
31. It should also be noted that the Marine Mammal Mitigation Protocol (MMMP) for piling (a draft of which is provided as document reference 8.13 of the DCO application) provides details of the mitigation requirements in relation to any physical or auditory injury to marine mammals in the event that piled foundations are proposed.



- Legend:
-  Norfolk Boreas site
 -  Offshore cable corridor
 -  Project interconnector search area
 -  Southern North Sea Special Area of Conservation (SAC)¹
 -  Summer Area¹
 -  Winter Area¹

¹JNCC, 2019.

Project:	Report:
Norfolk Boreas	In-Principle Site Integrity Plan

Title:
Southern North Sea Special Area of Conservation for harbour porpoise

Figure: 1.1 Drawing No: PB5640-007-007-001

Revision:	Date:	Drawn:	Checked:	Size:	Scale:
02	20/03/2019	LB	GS	A3	1:1,900,000
01	18/03/2019	LB	GS	A3	1:1,900,000

Co-ordinate system: ETRS 1989 UTM Zone 31N EPSG: 25831




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32. Any requirements to reduce acoustic disturbance in relation to European Protected Species (EPS) will be captured through the EPS Licencing process, if required.

2 CONSULTATION

2.1 Pre-consent

33. The draft Norfolk Vanguard In Principle SIP was submitted to the Norfolk Vanguard marine mammal Expert Topic Group (ETG) in April 2018 as part of the Evidence Plan Process (EPP) for that project. Due to the fact that this Norfolk Boreas In Principle SIP has been drafted in line with the Norfolk Vanguard SIP, this document has not been provided for EPP consultation prior to the DCO submission.

2.2 Post-consent

34. Consultation on the structure and content of the SIP will be conducted with the MMO and relevant SNCBs throughout the development of this document and a consultation log maintained throughout.
35. There will be an ongoing requirement to review the need for project mitigation and management measures with the MMO and other relevant organisations, including Natural England, Whale and Dolphin Conservation (WDC) and The Wildlife Trust (TWT), as the project design and construction plans are progressed.
36. A consultation programme will be developed at the post-consent and pre-construction stage.

2.3 Schedule for Agreement

37. It is not possible at this stage to determine exact dates for agreement and refinement of the SIP. However, the key milestones have been outlined in Table 2.1 to indicate the likely development of the SIP between consent and construction.

Table 2.1 Indicative milestones for refinement and agreement of the SIP

Indicative Stage	When	Action for Norfolk Boreas	Relevant Authority / Consultee	Status
In Principle SIP for Norfolk Vanguard	Prior to examination	The Norfolk Vanguard SIP (upon which this Norfolk Boreas SIP is based) was provided for review by the Norfolk Vanguard ETG.	MMO and Natural England; TWT and WDC	Completed
Consent determination and AA	Expected mid/late 2020	Review In Principle SIP, identify areas for revisions/updates.	Internal only	To be completed
Southern North Sea SAC final management measures are defined / further advice is provided.	Unknown	Review In Principle SIP and identify areas for revisions/updates once further guidance on the SAC is received.	MMO and Natural England, potentially Secretary of State, TWT and WDC	To be completed
Front End Engineering Design (FEED)	Pre-construction	Refining the project design during the pre-construction period. Updates to design that	Internal only	To be completed

Indicative Stage	When	Action for Norfolk Boreas	Relevant Authority / Consultee	Status
		could impact the conclusions of the AA may be subject to further assessment if deemed appropriate in consultation with the relevant authority. Any updated project design will also require consideration in the SIP.		
Submission and review of draft SIP and any associated documentation	Approximately 12 months prior to commencement of pile driving	The SIP will be updated to capture all relevant assessments and mitigation measures. Alongside the draft SIP implementation plan and any monitoring requirements will also be drafted for any required measures.	MMO and Natural England; draft Plan sent to TWT and WDC	To be completed
Final design	Approximately nine months prior to construction	Confirm the project design and installation techniques during the pre-construction period. Based on the final project design, including any required updated underwater noise modelling, an updated assessment will be undertaken if necessary, this will include consideration of in combination effects. Updates to the assessment that could impact the conclusions of the AA may be subject to further assessment if deemed appropriate in consultation with the relevant authority. Any assessment will also include the efficacy of mitigation or management measures.	MMO, Natural England, and potentially Secretary of State; with copies sent to TWT and WDC.	To be completed
Final SIP sign-off	Minimum four months prior to commencement of pile driving	The draft SIP will be updated and finalised. The final SIP will be agreed four months prior to the commencement of pile driving for written approval from the MMO prior to any piling works commencing.	MMO for sign off	To be completed
Construction monitoring and reporting	Construction	Monitoring/management reports will be submitted to the MMO.	MMO	To be completed

3 SOUTHERN NORTH SEA SAC FOR HARBOUR PORPOISE

38. The SNS SAC has been recognised as an area with persistent high densities of harbour porpoise (JNCC, 2017). The SNS SAC has a surface area of 36,951km² and covers both winter and summer habitats of importance to harbour porpoise, with approximately 66% (27,018km²) of the site being important in the summer and the remaining 33% (12,697km²) of the site being important in the winter period (Figure 1.1; JNCC, 2017).
39. The majority of the site is less than 40m in depth, reaching up to 75m in the northern most areas. The seabed is mainly sublittoral sand and sublittoral coarse sediment (JNCC, 2017). The site overlaps a number of existing Natura 2000 sites, including the Dogger Bank SAC, Margate and Long Sands SAC, Haisborough, Hammond and Winterton SAC and North Norfolk Sandbanks and Saturn Reef SAC, all of which have important sandbank and gravel beds.
40. Norfolk Boreas is located within the SNS SAC summer area, the project interconnector area is located in the SNS SAC summer area and offshore cable corridor crosses summer and winter areas (Figure 1.1).

3.1 Conservation Objectives

41. The Conservation Objectives for the SNS SAC are designed to ensure that the obligations of the Habitats Directive can be met. Article 6(2) of the Directive requires that there should be no deterioration or significant disturbance of the qualifying species or to the habitats upon which they rely.
42. The SIP will set out how the project will identify, agree and implement suitable and appropriate mitigation measures to ensure that the Conservation Objectives are upheld.
43. The Conservation Objectives for the site are (JNCC and Natural England, 2019):

“To ensure that the integrity of the site is maintained and that it makes the best possible contribution to maintaining Favourable Conservation Status (FCS) for Harbour Porpoise in UK waters

In the context of natural change, this will be achieved by ensuring that:

- 1. Harbour porpoise is a viable component of the site;*
- 2. There is no significant disturbance of the species; and*
- 3. The condition of supporting habitats and processes, and the availability of prey is maintained.”*

44. These Conservation Objectives *‘are a set of specified objectives that must be met to ensure that the site contributes in the best possible way to achieving Favourable Conservation Status (FCS) of the designated site feature(s) at the national and biogeographic level (EC, 2012) (JNCC and Natural England, 2019).*

3.1.1 Conservation Objective 1. The species is a viable component of the site.

45. This Conservation Objective is designed to minimise the risk of injury and killing or other factors that could restrict the survivability and reproductive potential of harbour porpoise using the site. Specifically, this objective is primarily concerned with operations that would result in unacceptable levels of those impacts on harbour porpoise using the site. Unacceptable levels can be defined as those having an impact on the FCS of the populations of the species in their natural range.
46. Harbour porpoise are considered to be a *viable component of the site* if they are able to live successfully within it. This site has been selected primarily based on the long term, relatively higher densities of porpoise in contrast to other areas of the North Sea. The implication is that the SAC provides relatively good foraging habitat and may also be used for breeding and calving. However, because the number of harbour porpoise using the site naturally varies there is no exact value for the number of animals expected within the site (JNCC and Natural England, 2019).
47. Harbour porpoise are listed as EPS under Annex IV of the Habitats Directive and are therefore protected from deliberate killing (or injury), capture and disturbance throughout their range. Within the UK, The Habitats Directive is enacted through the Habitats Regulations². Under these Regulations, it is deemed an offence if harbour porpoise are deliberately disturbed in such a way as to:
- a) Impair their ability to survive, to breed or reproduce, or to rear or nurture their young; or
 - b) To affect significantly the local distribution or abundance of that species.
48. The term *deliberate* is defined as any action that is shown to be any action *‘by a person who knows, in the light of the relevant legislation that applies to the species involved, and the general information delivered to the public, that his action will most likely lead to an offence against a species, but intends this offence or, if not, consciously accepts the foreseeable results of his action’*.
49. In addition, Article 12 (4) of the Habitats Directive is concerned with incidental capture and killing. It states that Member States *‘shall establish a system to monitor the incidental capture and killing of the species listed on Annex IV (all cetaceans). In*

² The Habitats Regulations in this case refers to the Conservation of Habitats and Species Regulations 2017 and the Conservation of Offshore Marine Habitats and Species Regulations 2017

light of the information gathered, Member States shall take further research or conservation measures as required to ensure that incidental capture and killing does not have a significant negative impact on the species concerned’.

3.1.2 Conservation Objective 2. There is no significant disturbance of the species.

50. The disturbance of harbour porpoise typically, but not exclusively, originates from operations that cause underwater noise, including activities such as seismic surveys, pile driving and sonar. Responses to noise can be physiological and/or behavioural. JNCC has produced guidelines to minimise the risk of physical injury to cetaceans from various sources of loud, underwater noise³. However, disturbance is primarily a behavioural response to noise and may, for example, lead to harbour porpoises being displaced from the affected area.
51. As outlined above, JNCC and Natural England (2019) note that harbour porpoise in UK waters are considered part of a wider European population and that due to the mobile nature of this species the concept of a ‘site population’ may not be appropriate for this species. JNCC advise that assessments of effects of plans or projects (i.e. HRA) need to take into consideration population estimates at the MU level, to account for daily and seasonal movements of the animals (2017a).
52. Disturbance of harbour porpoise may lead to displacement from an area, and the temporary loss of habitat. As such, JNCC and Natural England (2019) suggest that activities within the SNS SAC should be managed to ensure that the animals’ potential usage of the site is maintained and any disturbance should not lead to the exclusion of harbour porpoise from a significant portion of the site for a significant period of time. Disturbance is considered significant if it leads to the exclusion of harbour porpoise from a significant portion of the site.
53. The draft SNCB advice / guidance for the assessment of significant noise disturbance on harbour porpoise in the SNS SAC is that:

‘Noise disturbance within an SAC from a plan/project individually or in-combination is significant if it excludes harbour porpoise from more than:

- 1. 20% of the seasonal component of the Southern North Sea SAC in any given day, and*
- 2. An average of 10% of the relevant area of the site over a season.’*

3.1.3 Conservation Objective 3. The condition of supporting habitats and processes, and the availability of their prey is maintained.

54. Supporting habitats, in this context, means the characteristics of the seabed and water column. Supporting processes encompasses the movements and physical

³ <http://jncc.defra.gov.uk/page-4273>

properties of the habitat. The maintenance of these supporting habitats and processes contributes to ensuring prey is maintained within the site and is available to harbour porpoise using the site. Harbour porpoise are strongly reliant on the availability of prey species year round due to their high energy demands, and their distribution and condition may strongly reflect the availability and energy density of prey.

55. This Conservation Objective is designed to ensure that harbour porpoise are able to access food resources year round, and that activities occurring in the Southern North Sea SAC will not affect this.

3.2 Management Measures

56. Specific management measures are yet to be developed for the Southern North Sea SAC, however JNCC and Natural England (2019) advise that *'the maintenance of supporting habitats and processes contributes to ensuring that prey is maintained within the site and is available to harbour porpoises using the site.'*
57. JNCC and Natural England (2019) also state that *'management measures (e.g. the scale and type of mitigation) are the responsibility of the relevant regulatory or management bodies. These bodies will consider SNCB advice and hold discussions with the sector concerned, where appropriate.'*
58. In the absence of management measures for the SNS SAC at this time, Norfolk Boreas Limited are confident that their commitments to develop a MMMP for piling a MMMP for UXO, a SIP and EPS licensing, in consultation with the relevant authorities in the pre-construction period will ensure that appropriate project management and mitigation measures, if deemed necessary, can be agreed with the relevant regulators and will use the most appropriate methods, therefore upholding the Conservation Objectives.

4 PROJECT DESCRIPTION

59. A full description of the project design envelope is available in the Norfolk Boreas ES (see Chapter 5 Project Description and Chapter 12 Marine Mammals). However, as the project description is refined during final design this section will be updated as necessary to reflect any relevant changes.

5 POTENTIAL EFFECTS

60. The Offshore HRA Screening (Appendix 5.1 of the Information to Support HRA Report (document reference 5.3)) and consultation as part of the EPP (outlined in Chapter 12 (document reference 6.1.12) and Appendix 12.1 of the ES (document reference 6.3.12.1)), identified the following potential effects as a result of Norfolk Boreas on harbour porpoise, the qualifying feature of the SNS SAC, and so requiring further assessment:
- Potential disturbance and displacement as a result of increased underwater noise levels;
 - Potential for any lethal effects, physical injury or auditory injury (Permanent Threshold Shift (PTS)), associated with underwater noise;
 - Increased potential collision risk with vessels;
 - Changes in prey availability; and
 - Changes in water quality.
61. The overriding purpose of the MMMPs for Piling and for UXO, is to provide mitigation for the potential to kill or injure harbour porpoise during construction. The potential for any lethal effects, physical injury or auditory injury (PTS), associated with underwater noise will be mitigated through the MMMP (such as establishing a mitigation zone based on the maximum potential range for PTS, soft-start and ramp-up, and activation of Acoustic Deterrent Devices (ADDs) prior to soft-start) which will ensure this is not a risk for harbour porpoise. As a result of the commitment to the MMMP, any potential lethal injury, physical injury and permanent auditory injury (PTS) from underwater noise associated with clearance of unexploded ordnance (UXO) and piling does not require any further consideration in the SIP.
62. The Information to Support the HRA assessed the following potential effects during construction, operation and decommissioning of Norfolk Boreas (Table 5.1)

Table 5.1 Potential effects of Norfolk Boreas

Construction	Operation	Decommissioning
Permanent auditory injury resulting from the underwater noise associated with clearance of UXO.	N/A	N/A
Potential disturbance resulting from the underwater noise associated with clearance of UXO.	N/A	N/A
Permanent auditory injury resulting from the underwater noise during piling.	N/A	N/A
Potential disturbance resulting from underwater noise during piling.	Potential disturbance resulting from the underwater noise associated with operational turbines.	Potential disturbance resulting from the noise associated with foundation removal (e.g. cutting).

Construction	Operation	Decommissioning
Potential disturbance resulting from underwater noise during other construction activities, for example, seabed preparation, rock dumping and cable installation.	Potential disturbance resulting from the underwater noise associated with maintenance activities, such as any additional rock dumping and cable re-burial.	Potential disturbance resulting from the underwater noise associated with decommissioning activities, including infrastructure removal.
Potential disturbance resulting from underwater noise and presence of vessels.	Potential disturbance resulting from underwater noise and presence of vessels.	Potential disturbance resulting from underwater noise and presence of vessels.
Vessel interaction (collision risk).	Vessel interaction (collision risk).	Vessel interaction (collision risk).
Changes to prey resource.	Changes to prey resource.	Changes to prey resource.
Changes to water quality.	N/A	N/A

5.1 Summary of Potential Effects of Norfolk Boreas Alone

63. Table 5.2 summarises the potential effects of Norfolk Boreas alone.
64. The Information to Support HRA Report (document reference 5.3) indicates there is no predicted adverse effect on the integrity of the SNS SAC from Norfolk Boreas alone.

Table 5.2 Summary of the potential effects of Norfolk Boreas alone

Potential Effect	Assessment in relation to the North Sea MU population	Spatial assessment in relation to the SNS SAC summer and winter areas	Adverse effect on site integrity
During Construction			
Permanent auditory injury resulting from the underwater noise associated with clearance of UXO.	Without mitigation, up to 0.13% of NS MU reference population could be affected.	N/A Assessment based on number of individuals at potential risk.	No will be mitigated through the implementation of MMMP for UXO clearance.
Disturbance resulting from the underwater noise associated with clearance of UXO.	Less than 1% of the NS MU reference population could be temporarily disturbed.	Temporary displacement of harbour porpoise would be less than 20% of the seasonal component of the SAC area at any one time or on average exceed 10% of the seasonal component of the SAC area over the duration of that season.	No
Permanent auditory injury resulting from the underwater noise during piling.	Without mitigation, 0.000001% of the NS MU reference population could be affected.	N/A Assessment based on number of individuals at potential risk.	No will be mitigated through the implementation of MMMP for piling.
Disturbance resulting from underwater noise during single piling.	Less than 1% of the NS MU reference population could	Temporary displacement of harbour porpoise would not exceed 20% of the seasonal component of the SAC	No

Potential Effect	Assessment in relation to the North Sea MU population	Spatial assessment in relation to the SNS SAC summer and winter areas	Adverse effect on site integrity
	be temporarily disturbed.	area at any one time or on average exceed 10% of the seasonal component of the SAC area over the duration of that season.	
Disturbance resulting from underwater noise during concurrent piling.	1.1% or less of the NS MU reference population could be temporarily disturbed.	Temporary displacement of harbour porpoise would not exceed 20% of the seasonal component of the SAC area at any one time or on average exceed 10% of the seasonal component of the SAC area over the duration of that season.	No
Disturbance resulting from underwater noise during other construction activities.	0.36% or less of the NS MU reference population could be temporarily disturbed.	Temporary displacement of harbour porpoise would not exceed 20% of the seasonal component of the SAC area at any one time or on average exceed 10% of the seasonal component of the SAC area over the duration of that season.	No
Disturbance resulting from underwater noise and presence of vessels.	0.36% or less of the NS MU reference population could be temporarily disturbed.	Temporary displacement of harbour porpoise would not exceed 20% of the seasonal component of the SAC area at any one time or on average exceed 10% of the seasonal component of the SAC area over the duration of that season.	No
Vessel interaction (collision risk).	0.04% or less of the NS MU reference population could be at increased risk.	N/A Assessment based on number of individuals at potential risk.	No
Changes to prey resource.	0.36% or less of the NS MU reference population could be temporarily displaced.	Temporary displacement of harbour porpoise prey would not exceed 20% of the seasonal component of the SAC area at any one time or on average exceed 10% of the seasonal component of the SAC area over the duration of that season.	No
Changes to water quality.	0.36% or less of the NS MU reference population could be temporarily affected.	Areas of increased suspended sediment would not exceed 20% of the seasonal component of the SAC area at any one time or on average exceed 10% of the seasonal component of the SAC area over the duration of that season.	No

Potential Effect	Assessment in relation to the North Sea MU population	Spatial assessment in relation to the SNS SAC summer and winter areas	Adverse effect on site integrity
Overall effects during UXO clearance (for Norfolk Boreas alone).	1.3% or less of the NS MU reference population could be temporarily disturbed.	Displacement of harbour porpoise would not exceed 20% of the seasonal component of the SAC area at any one time or on average exceed 10% of the seasonal component of the SAC area over the duration of that season.	No will be partly mitigated through the implementation of MMMP for UXO clearance.
Overall effects during piling (for Norfolk Boreas alone).	Less than 1% of the NS MU reference population could be temporarily disturbed.	Displacement of harbour porpoise would not exceed 20% of the seasonal component of the SAC area at any one time or on average exceed 10% of the seasonal component of the SAC area over the duration of that season.	No
Overall effects during construction, other than piling (for Norfolk Boreas alone).	0.36% or less of the NS MU reference population could be temporarily disturbed.	Displacement of harbour porpoise would not exceed 20% of the seasonal component of the SAC area at any one time or on average exceed 10% of the seasonal component of the SAC area over the duration of that season.	No
During Operation and Maintenance			
Disturbance resulting from the underwater noise associated with operational turbines.	0.2% or less of the NS MU reference population could be disturbed.	Displacement of harbour porpoise would not exceed 20% of the seasonal component of the SAC area at any one time or on average exceed 10% of the seasonal component of the SAC area over the duration of that season.	No
Disturbance resulting from the underwater noise associated with maintenance activities.	0.36% or less of the NS MU reference population could be temporarily disturbed.	Displacement of harbour porpoise would not exceed 20% of the seasonal component of the SAC area at any one time or on average exceed 10% of the seasonal component of the SAC area over the duration of that season.	No
Disturbance resulting from underwater noise and presence of vessels.	0.36% or less of the NS MU reference population could be temporarily disturbed.	Displacement of harbour porpoise would not exceed 20% of the seasonal component of the SAC area at any one time or on average exceed 10% of the seasonal component of the SAC area over the duration of that season.	No
Vessel interaction (collision risk).	0.04% or less of the NS MU reference	N/A	No

Potential Effect	Assessment in relation to the North Sea MU population	Spatial assessment in relation to the SNS SAC summer and winter areas	Adverse effect on site integrity
	population could be at increased risk.	Assessment based on number of individuals at potential risk.	
Changes to prey resource.	0.36% or less of the NS MU reference population could be displaced.	Displacement of harbour porpoise would not exceed 20% of the seasonal component of the SAC area at any one time or on average exceed 10% of the seasonal component of the SAC area over the duration of that season.	No
Overall effects during operation and maintenance (for Norfolk Boreas alone).	0.36% or less of the NS MU reference population could be disturbed.	Displacement of harbour porpoise would not exceed 20% of the seasonal component of the SAC area at any one time or on average exceed 10% of the seasonal component of the SAC area over the duration of that season.	No
During Decommissioning			
Disturbance resulting from the noise associated with foundation removal.	0.36% or less of the NS MU reference population could be temporarily disturbed.	Displacement of harbour porpoise would not exceed 20% of the seasonal component of the SAC area at any one time or on average exceed 10% of the seasonal component of the SAC area over the duration of that season.	No
Disturbance resulting from underwater noise and presence of vessels.	0.36% or less of the NS MU reference population could be temporarily disturbed.	Displacement of harbour porpoise would not exceed 20% of the seasonal component of the SAC area at any one time or on average exceed 10% of the seasonal component of the SAC area over the duration of that season.	No
Vessel interaction (collision risk).	0.04% or less of the NS MU reference population could be at increased risk.	N/A Assessment based on number of individuals at potential risk.	No
Changes to prey resource.	0.36% or less of the NS MU reference population could be temporarily displaced.	Displacement of harbour porpoise would not exceed 20% of the seasonal component of the SAC area at any one time or on average exceed 10% of the seasonal component of the SAC area over the duration of that season.	No

Potential Effect	Assessment in relation to the North Sea MU population	Spatial assessment in relation to the SNS SAC summer and winter areas	Adverse effect on site integrity
Changes to water quality.	0.36% or less of the NS MU reference population could be temporarily affected.	Displacement of harbour porpoise would not exceed 20% of the seasonal component of the SAC area at any one time or on average exceed 10% of the seasonal component of the SAC area over the duration of that season.	No
Overall effects during decommissioning (for Norfolk Boreas alone).	0.36% or less of the NS MU reference population could be disturbed.	Displacement of harbour porpoise would not exceed 20% of the seasonal component of the SAC area at any one time or on average exceed 10% of the seasonal component of the SAC area over the duration of that season.	No

65. Table 5.3 summarises the potential effects of Norfolk Boreas alone in relation to the Conservation Objectives of the SNS SAC for harbour porpoise.
66. The Information to Support the HRA (document reference 5.3) indicates that, based on the Conservation Objectives, development of Norfolk Boreas alone would allow the Conservation Objectives to be upheld. There would be no potential for an adverse effect on the integrity of the SNS SAC in relation to the Conservation Objectives for harbour porpoise from Norfolk Boreas alone (Table 5.3).

Table 5.3 Summary of the assessment of the potential effects of Norfolk Boreas (alone) on the Southern North Sea SAC in relation to the Conservation Objectives for harbour porpoise

Conservation Objectives	Auditory injury from underwater noise - project alone	Disturbance from underwater noise - project alone	Increased collision risk – project alone	Changes to prey resources – project alone	Changes to water quality – project alone
The species is a viable component of the site	x	x	x	x	x
There is no significant disturbance of the species	x	x	x	x	x
The supporting habitats and processes relevant to harbour porpoises and their prey are maintained	x	x	x	x	x

* = no potential for any adverse effect on the integrity of the site in relation to the conservation objectives.

5.2 Summary of Potential In Combination Effects

67. Table 5.4 summarises the potential In combination effects during the construction period at Norfolk Boreas. Further details on the assessment methodology and In

combination scenarios are provided in the Information to Support the HRA report (document reference 5.3). The In combination effects during operation and maintenance or decommissioning would be less than those assessed for construction.

68. As a result of the in combination effect of underwater noise during the construction period at Norfolk Boreas, the Information to Support the HRA indicates that there is potential for Likely Significant Effects (LSE) and that without the SIP, there could be the potential for an adverse effect on the integrity (AEOI) of the SNS SAC.

Table 5.4 Summary of the potential in combination effects for Norfolk Boreas

Potential Effect	Assessment in relation to the North Sea MU population	Spatial assessment in relation to the SNS SAC summer and winter areas	Adverse effect on site integrity
Disturbance from underwater noise	14,043-16,579 harbour porpoise (4-4.8% of NS MU)	Average overlap with summer SNS SAC area = 6,774-9,222km ² (25.1-34.1%) Average overlap with winter SNS SAC area = 3,067-5,515km ² (24.2-43.4%)	No With the use of strategic mitigation and the proposed approach outlined in this SIP, there would be no significant disturbance and no adverse effect on the integrity of the SNS SAC in relation to the conservation objectives for harbour porpoise. Norfolk Boreas Limited intends to work with the MMO and relevant SNCBs in the development of a strategic approach to mitigation, as required subject to the final design and programme of Norfolk Boreas and other offshore wind farm projects. This would be addressed through the SIP.
Indirect effects – changes in prey resources	No additional effects to those assessed for underwater noise		No
Direct interaction - collision risk	Less than 0.1% of the NS MU reference population	N/A	No Less than 0.1% of the NS MU reference population could be at increased collision risk, without taking into account the potential disturbance of harbour

Potential Effect	Assessment in relation to the North Sea MU population	Spatial assessment in relation to the SNS SAC summer and winter areas	Adverse effect on site integrity
			porpoise as a result of underwater noise.

69. The in combination assessment on potential changes to prey availability has assumed that any potential effects on harbour porpoise prey species from underwater noise, including piling, would be the same or less than those for harbour porpoise. Therefore, there would be no additional effects other than those assessed for harbour porpoise, i.e. if prey are disturbed from an area as a result of underwater noise, harbour porpoise will be disturbed from the same or greater area, therefore any changes to prey availability would not affect harbour porpoise as they would already be disturbed from the same area. Any measures to reduce underwater noise and the disturbance to harbour porpoise would also reduce the disturbance of prey species.
70. As a precautionary approach, the number of harbour porpoise that could be at increased collision with vessels has been assessed based on the number of animals that could be present in the wind farm areas taking into account a worst-case of 5% increased collision risk. This is very precautionary, as it is highly unlikely that all marine mammals present in the wind farm areas would be at increased collision risk with vessels. In addition, based on the assumption that harbour porpoise would be disturbed as a result of underwater noise from piling, other construction activities, operational and maintenance activities and vessels, there should be no potential for increased collision risk with vessels.
71. As a result, the SIP will focus on potential disturbance and displacement as a result of increased underwater noise levels during UXO clearance and piling.
72. Table 5.5 summarises the potential in combination effects during the construction period at Norfolk Boreas in relation to the Conservation Objectives of the SNS SAC for harbour porpoise.
73. The Information to Support the HRA (document reference 5.3) indicates that, without the SIP, there is the potential for an anticipated adverse effect on the integrity of the SNS SAC in relation to the Conservation Objectives for harbour porpoise from the potential in combination effects of underwater noise during the construction period at Norfolk Boreas (Table 5.5).

Table 5.5 Summary of the assessment of the potential in combination effects during the Norfolk Boreas construction period on the SNS SAC in relation to the Conservation Objectives for harbour porpoise

Conservation Objectives	Disturbance from underwater noise – In combination	Increased collision risk – In combination	Changes to prey resources – In combination
The species is a viable component of the site	x	x	x
There is no significant disturbance of the species	?	x	x
The supporting habitats and processes relevant to harbour porpoises and their prey are maintained	x	x	x

x = No potential for any adverse effect on the integrity of the site in relation to the conservation objectives.

? = Potential adverse effect on the integrity of the site in relation to the conservation objectives, without Site Integrity Plan

74. In order to reach a conclusion of no adverse effect on site integrity, the Information to Support the HRA (document reference 5.3) concluded that, in combination with other plans or projects further mitigation and management measures may be necessary in relation to potential disturbance from underwater noise during the construction period at Norfolk Boreas. The potential for an adverse effect on site integrity was not concluded for any of the other in combination assessments.
75. As such, only mitigation or management measures in relation to disturbance from UXO clearance and pile driving noise at Norfolk Boreas are considered in this SIP as these are the potential noise sources that could result in the significant disturbance of harbour porpoise in combination with other underwater noise sources during the construction period at Norfolk Boreas. Significant disturbance is based on the current SNCBs thresholds for the site of:
- Displacement of harbour porpoise should not exceed 20% of the seasonal component of the SNS SAC area at any one time and / or on average exceed 10% of the seasonal component of the SNS SAC area over the duration of that season.
76. However, until a) further revisions are made to the other plan and project descriptions and timelines included in the HRA in combination assessment and b) further guidance is provided by the JNCC and Natural England on management measures for the SNS SAC, the potential mitigation and management measures in the SIP cannot be fully defined. Therefore, Norfolk Boreas Limited has listed project-specific measures that may be required and that can be secured through the SIP, if necessary (see Section 6.1).
77. It is acknowledged that following completion of the AA by the competent authority, the SIP may require revision to reflect the conclusions of the AA.

6 MITIGATION AND MANAGEMENT MEASURES

6.1 Norfolk Boreas Southern North Sea SAC Site Integrity Plan management and mitigation measures

78. As discussed in section 5, the Information to Support the HRA (document reference 5.3), has determined that project management and mitigation measures may be required, regarding the potential for significant disturbance to harbour porpoise from the in combination effects of underwater noise with other plans or projects during the construction period at Norfolk Boreas.
79. This section of the In Principle SIP outlines the measures currently available or likely to be available in the future, which could be applicable to UXO clearance and pile driving noise at Norfolk Boreas. For each of the measures, information will be provided to detail how the measure will result in the avoidance of significant disturbance to harbour porpoise and hence allow the conclusion of 'no adverse effect on integrity beyond reasonable scientific doubt' on the SNS SAC. It should be noted that the following factors need to be considered and taken into account in the final SIP:
- The SNS SAC management measures are currently unavailable;
 - The Norfolk Boreas project design parameters have not yet been finalised and the assessment to inform the HRA was based on the predicted worst-case scenario;
 - The final design and programme of other plans and projects has not yet been finalised and therefore the actual in combination scenario is currently unknown; and
 - Potential strategic management measures such as scheduling of pile driving (section 6.1.2) would need to be carefully managed to achieve a coordinated approach with other developers.
80. The adopted project measures would be agreed and secured in the period between consent and the commencement of piling, following an updated assessment of the potential impacts from pile driving and an assessment of their efficacy (see Table 2.1).
81. Potential measures are outlined in this section of the In Principle SIP, however as explained previously, confirmation of any measure(s) that will be employed cannot be confirmed until project design parameters are finalised, and the management measures are known for the SNS SAC. At that point it will be clear what any required measures will be seeking to achieve in terms of mitigation.
82. Potential mitigation to be delivered by the project management measures include:

- **Spatial:** Minimising the total area of ‘significant disturbance’ at any one time. This could be a reduction in the area of the SNS SAC which is subject to noise levels⁴ that may cause significant disturbance to harbour porpoise; or
- **Temporal:** Minimising the duration of additional underwater noise generated through UXO clearance and piling events over any given time frame that may cause ‘significant disturbance’ to harbour porpoise in the North Sea MU or the SNS SAC⁵.

6.1.1 Measure 1: Noise mitigation systems

83. Noise mitigation systems are currently being developed that enable a reduction of pile driving noise (decibels) at source. These methods currently include various types of bubble curtain, hydro-sound dampers, screens or tubes.
84. A reduction in the noise at source would reduce the total area of potential disturbance to harbour porpoise. However, it should also be noted that many of these measures may increase the total duration of disturbance from underwater noise during foundation installation and this should be a consideration in an assessment of their efficacy.
85. It should be noted that suitability of any noise mitigation system will be dependent on a number of factors including pile diameter and length, ground conditions, and water depth. These factors will be considered in any assessment of the efficacy of the measure. The information to inform this selection will be contingent on the selection of the chosen foundation type and supplier which will only be available once contracts are being finalised post consent and post Financial Investment Decision (FID).

6.1.2 Measure 2: Scheduling of pile driving

86. Subject to the final design and programme of Norfolk Boreas and other offshore wind farms and the potential for other management measures, refinement of the piling programme could potentially allow a reduction in the total in combination area of disturbance from multiple projects, if required, thus reducing the area of the SNS SAC that harbour porpoise may be displaced at any one time. It could also be used as a measure to reduce the duration of any in combination continuous disturbance within a given time period (month, season or year).
87. Amendments to the piling programme could allow the Regulator to schedule piling, having regard to previous, ongoing and future piling associated with other offshore

⁴ currently based on the displacement of harbour porpoise should not exceed 20% of the seasonal component of the SNS SAC area at any one time, but, if required, to be reviewed following any further guidance.

⁵ currently based on the displacement of harbour porpoise should not on average exceed 10% of the seasonal component of the SNS SAC area over the duration of that season, but, if required, to be reviewed following any further guidance.

developments and other activities likely to act in combination such as seismic surveys. As discussed above, potential scheduling of pile driving would need to be carefully managed by the Regulator. Prior to the start of construction an updated underwater noise prognosis, if required, for the final design of the wind farm will be included in the SIP. This will clearly set out the predicted noise levels to be generated by the preferred foundation type, installation technique and construction programme. This will then be used to update the commitments within the SIP. An outline of the schedule for this work has been provided in Table 2.1.

6.1.3 Measure 3: Alternate foundation methodologies

88. The use of alternate foundation methods, within the consented project envelope, along with any other relevant technologies or methodologies, during the final design. This would be informed by post-consent site investigation and technology developments. If possible, the use of foundation types and/or installation methodology other than pile driving would result in lower noise levels during the construction of the wind farm.
89. Developments are on-going in relation to methods such as vibro-piling and double walled piles, which also have the potential to greatly reduce the area of potential disturbance from pile driving.

6.1.4 Other potential measures

90. The SIP allows the consideration and assessment of other relevant technologies or methodologies that may emerge in the future. This will ensure that any new technologies or methods that may occur prior to construction can be used during construction of the project.
91. Given the time lag between consent and the start of offshore construction; it is possible that new measures will be available. The SIP should not be restricted only to potential measures at the time of consent.

6.1.5 Measures not applicable

92. Seasonal restrictions on pile driving or UXO clearance are not included in the SIP as potential project mitigation or management measures. While seasonal restrictions on pile driving and UXO clearance may be applicable to other projects in order to restrict pile driving or UXO clearance to a season in which harbour porpoise are less reliant on part of the seasonal area of the SNS SAC, the location of Norfolk Boreas means that (based on a 26km radius for potential disturbance) pile driving and UXO clearance noise could radiate into both summer and winter areas of the SNS SAC throughout the year.

93. Changes in the location of wind turbines or offshore platforms are also not included in the SIP as a potential project mitigation or management measure. Norfolk Boreas is located entirely within the SNS SAC, as such it is not possible to relocate wind turbines or offshore platforms to locations outside the SNS SAC, or to maximise distance from the SNS SAC boundary.

6.1.6 Assessment of efficacy of measures and implementation

94. Prior to the potential implementation of project mitigation or management measures, an assessment of the ability of each measure (alone or in conjunction with other measures) will be required to ensure the approach provides a discernible contribution to a reduction in disturbance to harbour porpoise within the SNS SAC. The assessment is expected to include a degree of likely confidence in each measure.
95. Norfolk Boreas Limited will work with the MMO and other statutory consultees to ensure that any approach to such assessment, is undertaken in a timely manner, and using the most robust approach possible.
96. Following assessment of project mitigation and management measures, Norfolk Boreas Limited will work with the MMO to develop a timescale for delivery of any measures, an implementation plan, as well as agree any reporting or monitoring requirements. The implementation plan will include the approach to enforcement of the measures, and how any failures will be rectified.
97. It is anticipated that following the provision of the final management measures, details of acceptable levels of disturbance will be provided, as well as noise thresholds considered to disturb harbour porpoise. This will enable an approach to assessment to be agreed, which will then enable the requirements of any project mitigation and management measures employed by Norfolk Boreas Limited to be identified and consulted upon, and appropriate implementation plans to be developed.

6.2 Other Mitigation Measures outside the Scope of the SIP

98. The project measures outlined in the SIP are in addition to the following mitigation secured within the MMMPs.
99. Embedded mitigation (i.e. those measures that have been incorporated into the design of the development to prevent or reduce any significant adverse effects) would include soft-start and ramp-up of piling activity in order to minimise potential impacts on physical and auditory injury. Appropriate mitigation measures considered adequate to exclude marine mammals from within a mitigation zone will be implemented prior to piling, to reduce the risk of any PTS.

100. The MMMP for piling will detail the proposed mitigation measures to reduce the risk of any physical or permanent auditory injury to marine mammals during all piling operations. This will include details of the embedded mitigation, for the soft-start, ramp-up and mitigation zone, as well as details of any further mitigation that could be required.
101. The MMMP for piling will be developed in the pre-construction period and will be based upon best available information and methodologies at that time in consultation with the relevant authorities.
102. A detailed MMMP will also be prepared for UXO clearance. The MMMP for UXO clearance will ensure there are effective mitigation measures to prevent the risk of any physical or permanent auditory injury to marine mammals, if UXO clearance is required. The MMMP for UXO clearance would be developed in the pre-construction period, when there is more detailed information on what UXO clearance could be required and what the most suitable mitigation measures are, based upon best available information and methodologies at that time, in consultation with the relevant authorities.
103. Mitigation for cumulative disturbance impacts will be discussed with the MMO and other relevant bodies, and options will be outlined within the SIP, where relevant (see Section 6.1).

6.3 EPS Licence

104. An EPS Licence will be sought from the MMO supported by a detailed risk assessment of the potential risk to harbour porpoise (and any other EPS deemed necessary at the time of application) based on the finalised project parameters and piling schedule/details.
105. As discussed above and outlined in Chapter 12 Marine Mammals of the ES (document reference 6.1.12), Norfolk Boreas Limited commits to the use of soft-start procedures and appropriate mitigation measures considered adequate to exclude marine mammals from within the mitigation zone to reduce the risk of physical and auditory injury to EPS as a result of underwater noise during pile driving activities.

7 SUMMARY

106. The management measures for the site are yet to be confirmed. Once further guidance from JNCC and Natural England is provided the SIP will be updated in consultation with the MMO and other relevant bodies.
107. The final SIP will be used to identify and assess any potential management or mitigation measures that could ensure 'no adverse effect beyond reasonable scientific doubt' on the SNS SAC for the significant disturbance of harbour porpoise based on the final design of Norfolk Boreas. The final SIP will also be used to record all consultation on the proposed project management or mitigation measures it contains.

8 REFERENCES

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