



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

NORFOLK BOREAS OFFSHORE WIND FARM

Planning Inspectorate Reference: EN010087

Deadline 7

Natural England's response to
DCO documents submitted at Deadline 5 and 6

31st March 2020

Our Ref: NE.NB.D7.02.DCO

Contents

1	Introduction	3
2	Detailed Comments.....	3

1 Introduction

Please find below Natural England’s comments on the following documents as submitted by the Applicant at Deadlines 5 and 6.

2 Detailed Comments

Paragraph	Page	Comment	RAG
Schedule of changes to the Draft DCO (Version 4)			
Point 68		Natural England welcomes the change, however notes that the minimum turbine size of 11.55MW should also be secured within the table.	Yellow
3.1 Updated Draft DCO (Version 5)			
		Comment is captured within schedule of changes to draft DCO comment above.	Yellow
3.3 Note of requirements (Version 3)			
Annex 1 Diagram 2		On the diagram showing Relationship of Pre-commencement Plans secured by DCO and DMLs, for the offshore section. Natural England considers that reference should be made here to the requirements to submit monitoring methodologies, including the new proposed plan for ornithological monitoring aims and objectives to be submitted	Yellow
6.6 Schedule of Mitigation (Version 3)			
Table 6		In relation to the operations and maintenance section of the table we wish to reiterate the comments we made on the updated CRM for Boreas alone regarding: <ul style="list-style-type: none"> •the suggested revision to the draft DCO wording that the Applicant suggested in that document to secure the mitigation and draught height (assuming this was included and still stands) and •the need for clarification on points of reference used for hub heights, tidal offset and draught height (i.e. MHWS rather than HAT). 	Red
8.1 Outline Code of Construction Practice Version 3			
210	66	Appendix E - It is not clear how many hedgerow gaps will be required for vehicle access routes along the onshore cable. It is not clear how and when the impact of this will be assessed once the detailed design is completed, particularly in relation to impacts upon hedgerows of medium to high importance for Barbastelle.	Yellow
175	56	We note the additional text added to Version 3 regarding emergency operations in SSSIs, and the Applicants commitments to update the text to reflect the suggestions of Natural England for the next revision.	Yellow

142	45	<p>Natural England note the additional text included with regards a pre-construction survey of each crossing location. Please can the Applicant clarify if pre construction surveys will include a phase 1 survey? We would also welcome the inclusion of the term ecological enhancements, to differentiate between flood risk and sediment management enhancements.</p> <p>Natural England would welcome further definition of post construction ecological monitoring to be included on the OCOCP, to include detail of what will be monitored and at what time intervals (we note that more detail was provided in the response to Ex WQ 2.15.0.11 but that this does not appear to have been incorporated into the DCO documents as yet.).</p>
-	-	With regards hedgerow removal the OCOCP should include criteria for determining 'poor weather' as stipulated in OLEMS para 94.
208	66	<p>In the Clarification Note Ecological Enhancements (D2), para 10 states that hedgerows will be replanted to an improved ecological standard that aligns with NBP's guidance. However OCOCP Appendix E (D5) states that 'Only hedge plants such as quick thorn and blackthorn may be planted directly above the onshore cables where a hedge is necessary either for screening purposes or to indicate a field boundary'.</p> <p>It is not currently clear how those commitments in the clarification Note Ecological Enhancement have been included in the OCOCP or OLEMS, and will be managed in relation to different planting specifications.</p> <p>Given the number of Ex A WQ in relation to hedgerows and the overlapping documents Natural England suggest that an Outline Hedgerow Mitigation Plan is submitted as part of DCO to ensure that all commitments made within various documents can be implemented without any contradiction.</p>
8.7 Outline Landscape and Ecological Management Strategy Version 3		
	16	We welcome the inclusion of a commitment that all areas temporarily used during constructions will be reinstated as soon as practically possible, we would welcome inclusion of text 'and ecologically enhanced where possible'.
125	40	We note that OLEMS was updated D1 Para 146 Page 45 to include 'adhere to standing advice regarding ancient woodland' and this has been marked as green in our risk and issues register. However this has not been reflected throughout the document and advise that text is also included such as 'a buffer of at least 15m and as informed by an arboricultural survey' within Route refinement page 14 and embedded mitigation para 125.
8.8 Outline Traffic Management Plan Version 3		
74	17	Welcome inclusion of para 74 in OTMP, advise that the Applicant include ES figure 26.5 as an Appendix to the OTMP to allow reference should the ES not be publicly available by the time of construction.
		This does not show the location of designated sites sensitive to air quality in relation to the traffic and HGV routes, either alone or in combination with other developments. Advise that the Applicant include ES figure 26.5 as an Appendix to the OTMP.

8.11 Outline Offshore Operations and Maintenance Plan (Version 3)		
		No further comment- the changes to this document have not resolved the final issue previously raised.
8.12 Offshore In Principle Monitoring Plan (Version 3)		
4.5.2	19	<p>Natural England advises that text such as that suggested below be included within conditions and linked to the IPMP.</p> <p><i>Pre construction monitoring condition</i></p> <p>Appropriate surveys of existing marine mammal activity required to test predictions in the environmental statement concerning key marine mammal interests of relevance to the authorised scheme.</p> <p><i>Post construction monitoring condition</i></p> <p>Appropriate marine mammal surveys required to test predictions in the environmental statement concerning key marine mammal interests of relevance to the authorised scheme.</p>
8.15 Proposed Sediment Disposal Site, Site Characterisation Report (Version 3).		
		We welcome this document and the changes made in light of the reduced project design. We note that the new area for disposal is outside of 'benthic' designated sites, and is large so that Norfolk Vanguard and Boreas can use the area.
8.16 Outline Scour Protection and Cable Protection Plan (Version 3)		
		We welcome the revisions to the document to take into account the reductions in scour and cable protection. We have no further advice to that already provided in our previous responses.
Clarification Note Ecological Enhancements		
		It is not clear how some of the commitments within this document are to be secured, for example, the watercourse crossing examples of enhancements that will be considered do not appear to be outlined in the OCOCP, or cross reference to the clarification note made. The Applicant should clarify where these commitments are secured.