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The Wildlife Trust reference: 20022896.

BY EMAIL

29 April 2020

Dear Frances

The Wildlife Trusts response to deadline 9: Article 6(4) and cabling impacts

TWT has not engaged on the impacts of cabling on Haisborough, Hammond and Winterton SAC from Norfolk Boreas. However, the impact of cabling on Marine Protected Areas (MPAs) is a key concern for TWT, and as such, the Article 6(4) process is a priority area of TWT in relation to this impact. As a summary of TWTs broad views on the Article 6(4) process for cabling impacts on benthic habitats within MPAs:

- TWT consider that alternatives are available which should be further investigated by developers.
- TWT does not support rock protection in MPAs
- Compensation should be assessed against site conservation objectives, conservation advice and the coherence of the UK MPA network. Advice is required to support this, and we recognise that the scope of this goes beyond the project.
- Strategic measures need to be explored and developed to allow the scale of offshore wind farm development expected whilst maintaining the coherence of the UK MPA network. We also recognise that the scope of this goes beyond the project.

Our detailed views on Article 6(4) can be viewed in our response to the further information requested by the Secretary of State for BEIS on the Article 6(4) process for Hornsea Three¹ and Norfolk Vanguard².

It is essential that a consistent approach to assessing projects undertaking Article 6(4) assessments is undertaken. In line with this, there should also be consistent decision making. The delivery of compensation in the marine environment is extremely difficult

¹ TWT response to Hornsea Three further information to Secretary of State for BEIS on the derogation process for the Habitats Directive Article 6(4) and Article 126 of the Marine and Coastal Access Act 2009 <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010080/EN010080-003214-The%20Wildlife%20Trusts%20-%20Resposne%20to%20SoS%20Consultation%203.pdf>

² TWT response to Norfolk Vanguard further information to Secretary of State for BEIS on the derogation process for the Habitats Directive Article 6(4). Not yet published on Planning Inspectorate website but TWT are happy to provide a copy upon request.

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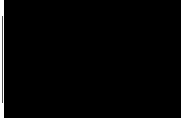
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to deliver at a project level and places a risk to both individual Sites and the coherence of the UK MPA network. Therefore, TWT is recommending a pause in decision making for all projects going through the Article 6(4) process to allow a review of options at both a project and strategic level.

Thank you for taking our comments into consideration. We are happy to provide more details if required.

Yours sincerely



Joan Edwards
Director, Public Affairs and Marine Conservation
The Wildlife Trusts