NORFOLK BOREAS OFFSHORE WIND FARM

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Natural England's comments on Additional information to the HHW SAC position paper- Annex 2 Cable Protection Decommissioning Evidence

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1 Introduction

1.1 Please find below Natural England's comments in response to Additional information to the HHW SAC position paper- Annex 2 Cable Protection Decommissioning Evidence REP6-018.

2 Summary

2.1 Natural England welcomes the comprehensive consideration of possible cable protection decommissioning options. Whilst a commitment to decommissioning is welcomed as best practice and may mean no permanent habitat loss; it does not mean there won't be a 'lasting' effect on the habitat for the lifetime of the project i.e. 30 years or longer as it may take some time to recover. There is limited assessment and understanding of what the implications of this enduring temporal impact will be on the conservation objectives of the site and recovery of the Annex I habitats.

2.2 Therefore, there remains a sufficient degree of uncertainty that an Adverse Effect on Integrity of HHW SAC cannot be ruled out beyond all scientific doubt.

2.3 In addition, based on the information presented in this document, for decommissioning to be considered as a mitigation measure then there would need to be a DCO/dML condition that restricts the type of cable protection to concrete mattresses (or similar protection).

2.4 Please find below Natural England's detail comments

3 Detailed Comments

Para.	Page	Comment	RAG
		General Comment: Natural England recognises that the proposed cable protection not only increases the probability of removal at the time of decommissioning, but also reduces the footprint of the impact.	
8	2	Natural England highlights that whilst the impacts from cable protection are no longer considered to be permanent; the placement of cable protection is considered to be having a lasting change on the habitat over a period of 30 years (life time of project) and beyond, as recovery will not be immediate. There is no evidence presented that demonstrates what the impacts are likely to be on Annex I habitats and site conversation objectives from such a temporally long time and that habitat recovery is achievable to its pre-impacted state. Therefore, it is our view that a 30 years change in habitat can't be considered to be a small scale loss/change. In addition there is no evidence presented on the potential for any wider surrounding area impacts from the presence of the cable protection and its removal. Therefore, due to the uncertainties any assessment needs to include precaution. For decommissioning to be considered as mitigation then this would need to be restricted to concrete mattresses (or similar type product).	

1.3.2	3	Concrete mattresses Based on the information presented the Applicant is accepting the industry concerns in relation to laying concrete mattresses and potential for them to be removed. Therefore, for decommissioning of cable protection to be considered as mitigation there would need to be a DCO/dML condition specifying concrete mattress (or similar type product) for cable protection. Noting that if restricted to concrete mattress or similar product, modifications to achieve removal at time of decommissioning would be required and should inform any in principle decommissioning plan	
4.2.	7	Duramat Natural England has limited experience of Duramat's being used in the marine environment. However we note that it is effectively made of plastic with a glass coating. Therefore, before this cable protection could be agreed there would need to be confidence that the mats would not degrade along with a guarantee of recovery. However, we do note the advantages of the low profile which is likely to allow natural processes to function.	
4.2.	7	Duramat Can the CSUB (Duramat) system be used alone? It is mentioned that it can be held in place by ballast, how likely is that to be rock armouring?	