



NORFOLK BOREAS OFFSHORE WIND FARM

Planning Inspectorate Reference: EN010087

Deadline 9

29th April 2020

**Natural England's comments on Outline Norfolk Boreas Haisborough Hammond
and Winterton Special Area of Conservation Site Integrity Plan and Cable
Specification, Installation and Monitoring Plan**

Our Ref NE.NB.D9.03.HHW SIP

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1 Introduction

1.1 Please find below Natural England’s comments on the 8.20 Control Documents: Outline Norfolk Boreas Haisborough Hammond and Winterton Special Area of Conservation Site Integrity Plan (‘HHW SIP’) [REP6-012] and the Cable Specification, Installation and Monitoring Plan as submitted by the Applicant [REP6-017].

1.2 List of Acronyms

- NB – Norfolk Boreas (the ‘Project’)
- HHW – Haisborough Hammond and Winterton
- SAC – Special Area of Conservation
- SIP – Site integrity Plan
- SoS – Secretary of State
- CSIMP – Cable Specification, Installation and Monitoring Plan

2 Summary

2.1 Overall Natural England’s view on the use of a SIP to defer the required consideration of adverse effects on integrity to post consent remains unchanged as set out in Natural England’s position paper submitted at Deadline 4 of the Boreas examination [REP4 – 041].

2.2 However, Natural England does consider the SIP and CSIMP documents to be useful in collating all of the relevant information provided to address potential impacts to HHW SAC and securing the commitments made by the Applicant to reduce the impacts to designated site features.]

2.3 In relation to securing mitigation measures we note that the CSIMP would also have this requirement therefore we propose that the CSIMP should in fact be the ‘Cable Specification, Installation, Mitigation and Monitoring Plan.’

2.4 Please find below Natural England’s detailed comments.

3 Detailed Comments

Para.	Page	Comment	RAG
General Comments relevant to SIP and CSIMP		How will the monitoring for Norfolk Vanguard and Boreas take into account potential skewing of data from works happening for either project?	
General Comment relevant to SIP and CSIMP		Also all of the points raised in relation to the In principle Monitoring Plan for Boreas need to be acknowledge in the Control Documents	

Section 3		In a previous version paragraph 36 had detailed information on what would be provided pre construction to inform cable installation – we would welcome its retention.	
SIP 41. CSIMP 65	13	<p>Cable protection</p> <p>Please note that within Annex 4 which discusses the possible decommissioning of cable protection 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 conservation 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 cable protection would need to be restricted to concrete mattresses (or similar type product) in the DCO/DML through an update to the interpretations.</p> <p>The same is true for CSIMP paragraph 65.</p>	
SIP Section 5.4 CSIMP Section 4.4	15	<p>Sediment Disposal</p> <p>We note that in the disposal principles the need to dispose of sediment in areas of similar grain size i.e. the SoS 95% similar DCO condition has not been addressed.</p> <p>Natural England has engaged in discussion with the Applicant on the condition for 95% similar sediment and will be informed by the outcome of the deliberation of SoS in relation to Hornsea Project Three and Vanguard. We would suggest that the decision of the SoS be applied to the Boreas project.</p> <p>In addition the above comment on decommissioning is also relevant to the text included within the table.</p>	
SIP Table 5.1 CSIMP Table 4.1 and Para 57	32 19	<p>Sandwave Levelling</p> <p>Natural England welcome that the final HHW SAC CSIMP will contain a pre-construction sandwave levelling report as requested by Natural England within their Relevant Representation (RR-099).It is however unclear if the pre-construction Sandwave levelling report is secured in the DCO. This could be included as a requirement under the transmission DML condition 9 (g) however it currently is not secured.</p>	

SIP Table 5.2	42	Mitigation Commitments Natural England welcomes the commitment to not use jack up vessels in HHW SAC to further minimise impacts to benthic habitats.	
CSIMP Table 4.2	28		
SIP Figure 3		Annex I Sandbank Natural England notes that Norfolk Boreas highlight only the delineated Sandbank feature and buffer zone as areas of Annex I Sandbanks that are to be managed for conservation as Sandbanks. However, the sediment between Sandbanks is also important for the functioning of the Sandbanks, as well as for Annex I Reef formation, and therefore impacts occurring between features may still be detrimental to the Annex I feature(s). A 2016 SNCB survey identified that the species composition in these areas was similar to that of the species composition within the Annex I features. Put simplistically, if these areas are sandy and dynamic they are considered important to / part of the Sandbank features and if stable and mixed sediment have the potential to support Reef habitat. The only areas within the SAC thought not to be providing this important 'functionality' role is where exposed oil and gas pipelines transect the site. Therefore it cannot be determined that the impacts are small scale and inconsequential.	
CSIMP Figure 3	Appendix 3 of CSIMP		
SIP Chap 4.2	13	Micrositing Natural England notes that in both the SIP and the CSIMP the consideration of micrositing does not take into account potential archaeological finds. Please see Natural England's advice on Applicants Clarification Note on optimising cable routing through the HHW SAC [REP5 – 081] for details on this matter.	
CSIMP Chap 4.2	15		
CSIMP Appendix 2	36	Interim cable burial study Whilst Natural England welcomes the further consideration of the data sets; we note that there is currently only limited scientific evidence on which to base the conclusions of this report; in particular the recovery of reef.	
CSIMP Appendix 3	59	Locations of cable protection Natural England notes that the area(s) most likely to require cable protection is within mixed sediment areas between Sandbanks which are most likely to support Annex I reef.	