

Norfolk Boreas Offshore Wind Farm Outline Norfolk Boreas Haisborough Hammond and Winterton Special Area of Conservation Site Integrity Plan

(Version 4) (Clean)

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Glossary of Acronyms

AEol	Adverse Effect on Integrity
DCO	Development Consent Order
DML	Deemed Marine Licence
EIA	Environmental Impact Assessment
ES	Environmental Statement
HHW	Haisborough, Hammond and Winterton
HRA	Habitat Regulations Assessment
HVDC	High Voltage Direct Current
JNCC	Joint Nature Conservation Committee
MMO	Marine Management Organisation
SAC	Special Area of Conservation
SNCB	Statutory Nature Conservation Body
SIP	Site Integrity Plan
VPWL	Vattenfall Wind Power Limited

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
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.
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.
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.
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 this Outline Norfolk Boreas Haisborough, Hammond and Winterton (HHW) Special Area of Conservation (SAC) Site Integrity Plan (SIP) (herein referred to as the HHW SIP) is to set out the process for Norfolk Boreas Limited to agree all works, potential mitigation measures and monitoring associated with offshore cable installation (including seabed preparation works and cable protection) and maintenance within the HHW SAC, with the Marine Management Organisation (MMO) in consultation with Natural England, in order to ensure there would be no adverse effect on integrity (AEoI) on the HHW SAC as a result of Norfolk Boreas.

1.2 Project Background

2. Norfolk Boreas Limited, ('the Applicant') is proposing to develop Norfolk Boreas (hereafter 'Norfolk Boreas' or 'the project'), an offshore wind farm in the southern North Sea.
3. Norfolk Boreas comprises the Norfolk Boreas site, within which wind farm array will be located (Figure 1.1). The Norfolk Boreas site would 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 (document reference 6.1.5).
4. 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.

¹ There may 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.

5. This Outline Site Integrity Plan (SIP) relates to a section of the offshore export cables, where they overlap with the Haisborough, Hammond and Winterton (HHW) Special Area of Conservation (SAC) (Figure 1.1).
6. The Norfolk Vanguard Offshore wind farm project is being developed by Norfolk Vanguard Limited which like Norfolk Boreas Limited is an affiliate company of Vattenfall Wind Power Limited (VWPL). The Norfolk Vanguard project is approximately one year ahead of Norfolk Boreas in its development and at the time of writing the DCO application is awaiting its determination.
7. A strategic approach has been taken to developing both Norfolk Boreas and Norfolk Vanguard (see Chapter 1 Introduction and Chapter 5 Project Description of the Norfolk Boreas ES and document 3.4 the Inter relationship Report for further details on the relationship between Norfolk Vanguard and Norfolk Boreas). This is particularly pertinent to the offshore cable corridors for both projects which have been identified in a strategic manner such that a single corridor would be sufficient for both projects in order to minimise potential impacts (see section 4.7 and 4.8.1 of Chapter 4 Site Selection and Assessment of Alternatives of the ES, document reference 6.1.4). Therefore, the area of the offshore cable corridor which overlaps with the HHW SAC is identical for both projects.
8. Norfolk Boreas Limited have included two scenarios within the DCO application; Scenario 1 where Norfolk Vanguard and Norfolk Boreas proceed to construction and Scenario 2 where Norfolk Vanguard does not. These two scenarios are presented in Chapter 5 Project Description of the ES (document reference 6.1.5). The two scenarios have not materially affected the drafting of this document as the worst case for impacts within the HHW SAC for the Norfolk Boreas project alone would be the same regardless of which ever scenario is taken forward. It should be noted however the worst case scenario for in combination impacts would occur under Scenario 1 and this is also considered throughout this document.
9. The Norfolk Boreas Environmental Impact Assessment (EIA) has followed a 'Rochdale' or 'design envelope' approach, as discussed in section 5.1.1 of ES Chapter 5 Project Description (document reference 6.1.5). The design envelope provides flexibility allowing the project to be optimised and refined prior to construction. Therefore, realistic worst case scenarios have been adopted in the ES (document 6.1) and Information to Support Habitats Regulations Assessment (HRA) report (document reference 5.3), to allow a precautionary and robust impact assessment. Through various additional commitments made by the Applicant since the submission of the Norfolk Boreas DCO application, the worst case scenario has been refined. A summary of the latest worst case scenario is provided in Section 3.

10. The detailed design of Norfolk Boreas (e.g. micro-siting of the cable route and the requirement for cable protection) will be determined post-consent.

1.3 The Outline Site Integrity Plan background

11. Condition 9(1)(m) of Schedules 11 and 12 (The Transmission Deemed Marine Licences (DMLs)) of the Norfolk Boreas draft Development Consent Order (DCO) state:

“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 outline Norfolk Boreas Haisborough, Hammond and Winterton Special Area of Conservation Site Integrity Plan has been submitted to the MMO and the MMO (in consultation with the relevant statutory nature conservation body) 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 sandbanks and Sabellaria spinulosa reefs are a protected feature of that site.”

12. 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 finalised prior to consent. Key outstanding areas of uncertainty that will be addressed post consent through the SIP include:
 - **The precise extent and location of the Annex I reef feature.** Due to the ephemeral nature of *S. spinulosa* reef which has the potential to vary greatly. This will be informed by pre-construction surveys which must be undertaken no earlier than 12 months prior to cable installation;
 - **The detailed installation methodology, cable crossings and requirement for any cable protection.** This will be informed by pre-construction surveys which must be undertaken no earlier than 12 months prior to cable installation; and
 - **The design of cable and pipeline crossings.** These will be determined by crossings agreements with cable and pipeline owners or operators which will be progressed post consent.
13. It is recognised that some existing offshore wind farms have been permitted to route cables through SACs without the need for a SIP. However, the Natural England (2018) report ‘Offshore wind cabling: ten years’ experience and recommendations’, notes that engineering considerations that were unforeseen at the consenting stage have resulted in a necessity for consent variations during construction.
14. Norfolk Boreas Limited has therefore taken a conservative approach in the assessment, (e.g. by assessing a contingency for cable protection) in accordance with advice from Natural England and the MMO during the Evidence Plan Process. The

purpose of this approach is to avoid the need for post consent variations and to make a firm commitment through the SIP (as required by Condition 9(1)(m) of Schedule 11 and 12) to agree all works in the HHW SAC with the MMO in consultation with Natural England. This approach justifies a robust conclusion of no AEoI at the consenting stage on the basis that works cannot commence until the MMO is satisfied that there would be no AEoI.

15. The Outline SIP provides a framework for further post-consent consultation by Norfolk Boreas Limited with the MMO and Natural England, to agree the exact details of any required project related management measures. Indicative mitigation measures are outlined in section 5.1 of this Outline SIP which would be developed in consultation with the MMO and other relevant bodies, post consent based on the final design of Norfolk Boreas to ensure the mitigation will deliver no AEoI. The process that would be undertaken in finalising the SIP is outlined in Plate 1.1 below.

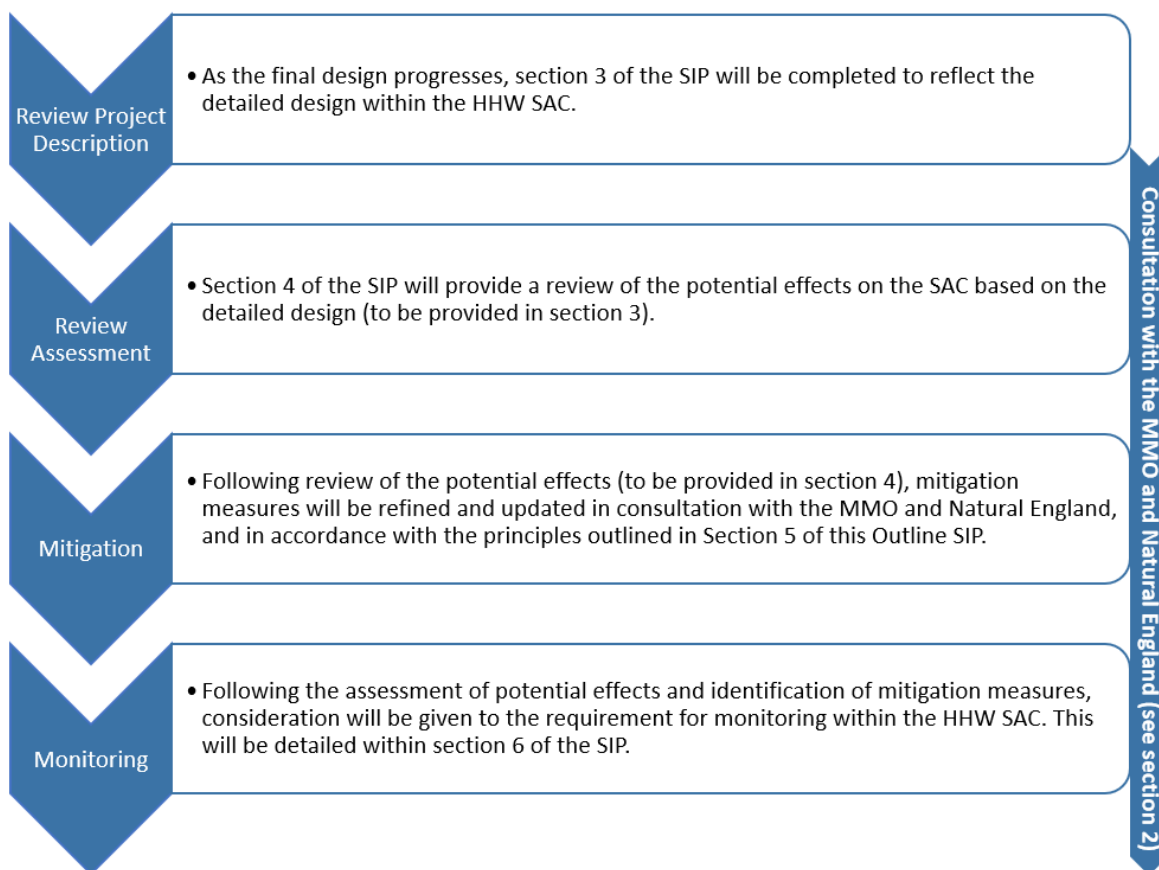


Plate 1.1 Site Integrity Plan Process

16. Condition 9(1)(m) of Schedules 11 and 12 of the draft DCO secure the requirement for the HHW SAC SIP within the DMLs, whilst allowing scope for refinement of the precise mitigation measures to be adopted based on pre-construction surveys as well as latest guidance and evidence.
17. This Outline SIP reflects the commitment of Norfolk Boreas Limited to undertake further mitigation measures that may be necessary to avoid the potential for Adverse Effects on Integrity of the Annex I Reef and Sandbank features of the HHW SAC.
18. The DMLs set out certain timescales in advance of commencement of the licensed activities, by when the SIP must be submitted to the MMO for their approval, following revision and consultation as per the outline schedule in section 2.4. The final mitigation would be based on latest targets, guidance, pre-construction survey data and available evidence from other projects. Mitigation measures must be agreed with the MMO in consultation with Natural England.
19. This document is specifically designed to satisfy the condition within the Norfolk Boreas DCO alone, however as discussed above consideration will also be given to Norfolk Boreas's sister project, Norfolk Vanguard to ensure mitigation solutions are compatible for both projects.
20. As the two projects share an offshore cable corridor through the HHW SAC Norfolk Boreas Limited will have the advantage of being able to learn from the experience of the Norfolk Vanguard project. In accordance with this commitment, the Applicant has updated this document in line with the latest changes in the design envelope and additional commitments that have been made as part of the Norfolk Boreas Examination, including those made in response to the Department for Business, Energy and Industrial Strategy (BEIS) letter to Norfolk Vanguard requesting further information.

1.4 The Haisborough Hammond and Winterton Special Area of Conservation

21. The HHW SAC is located to the west of Norfolk Boreas, and the offshore cable corridor passes through the SAC. The SAC is designated for Annex I Sandbanks which are slightly covered by seawater all the time and Annex I Reefs (*Sabellaria spinulosa*).
22. The sandbank ridges consist of sinusoidal banks which have evolved over the last 5,000 years and comprise of Haisborough Sand, Haisborough Tail, Hammond Knoll, Winterton Ridge and Hearty Knoll. Older sandbanks, Hewett Ridge and Smiths Knoll, are present along the outer site boundary and have formed over the last 7,000 years. The more geologically recent sandbanks of Newarp Banks and North and Middle Cross Sands lie on the south west corner of the SAC².

23. The Joint Nature Conservation Committee (JNCC) HHW Site Details² state that *S. spinulosa* reef has been recorded at Haisborough Tail, Haisborough Gat and between Winterton Ridge and Hewett Ridge. *S. spinulosa* reefs within the HHW SAC can have an elevation of 5cm to 10cm and in areas where reef has been recorded, this can have between 30% to 100% coverage.
24. As described above and shown in Figure 1.1, the Norfolk Boreas offshore cable corridor overlaps with the HHW SAC and therefore there is potential for the designated features of the SAC to be affected during the construction and maintenance of Norfolk Boreas.

1.4.1 Conservation Objectives

25. Conservation objectives are set by the JNCC and Natural England to ensure that, subject to natural change, the integrity of a site is maintained or restored as appropriate, and that the site contributes to achieving the Favourable Conservation Status of its qualifying features, by maintaining or restoring:
 - The extent and distribution of qualifying natural habitats and habitats of the qualifying species;
 - The structure and function (including typical species) of qualifying natural habitats;
 - The structure and function of the habitats of the qualifying species;
 - The supporting processes on which qualifying natural habitats and habitats of qualifying species rely;
 - The population of qualifying species; and
 - The distribution of qualifying species within the site.
26. The overarching Conservation Objectives for the HHW SAC are as follows (JNCC and Natural England, 2013):
 - *“Subject to natural change maintain the sandbanks in favourable condition, in particular the sub-features:

 - Low diversity dynamic sand communities
 - Gravelly muddy sand communities”*; and
 - *“Subject to natural change maintain or restore the reefs in favourable condition”*.
27. ‘Favourable Condition’ is the term used in the UK to represent ‘Favourable Conservation Status’ (FCS) for the interest features of SACs. For an Annex I habitat, FCS occurs under the Habitats Directive when (JNCC and Natural England, 2013):

² <http://jncc.defra.gov.uk/protectedsites/sacselection/sac.asp?EUCode=UK0030369>

- “Its natural range and area it covers within that range are stable or increasing;
 - The specific structure and functions, which are necessary for its long-term maintenance, exist and are likely to continue to exist for the foreseeable future; and
 - The conservation status *of its typical species is favourable*”.
28. Favourable condition of the sandbanks and reefs is assessed based on the long-term maintenance of the following (JNCC and Natural England, 2013):
- *“Extent of the habitat (and elevation and patchiness for reef);*
 - *Diversity of the habitat;*
 - *Community structure of the habitat (population structure of individual species and their contribution to the functioning of the habitat); and*
 - *Natural environmental quality (e.g. water quality, suspended sediment levels).”*
29. Supplementary Advice³ for the HHW SAC provides various qualitative targets associated with achieving the Conservation Objectives of the HHW SAC. Those of relevance to Norfolk Boreas are outlined in Table 1.1 below.
30. In August 2019 Natural England published the results of the latest condition status assessment⁴ for the site. This assessment finds that 100% of the Annex I Reef and Sandbank features are in unfavourable condition and both features need to be restored to favourable condition. This is reflected in Natural England’s Supplementary Advice Targets outlined in Table 1.1.
31. The latest condition of Annex I Reef and Sandbanks, and the associated targets will be taken in to account at the time of finalising the SIP post-consent.

Table 1.1 Supplementary Advice Targets of Relevance to Norfolk Boreas

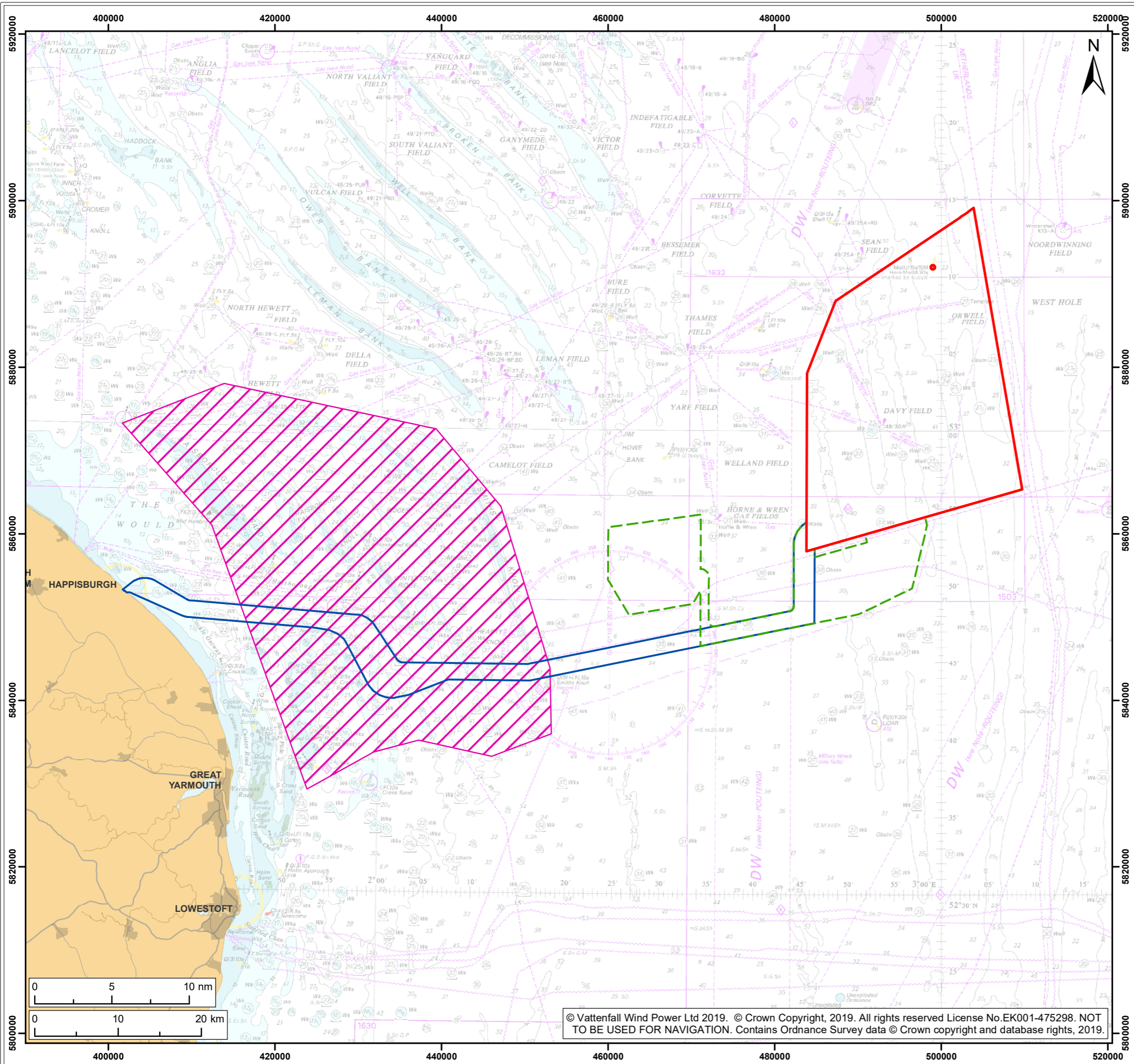
Attribute		Target
Reefs	Distribution: presence and spatial distribution of biological communities	Restore the presence and spatial distribution of reef communities.
	Extent of subtidal biogenic reef	When <i>Sabellaria</i> reef develops within the site, its extent and persistence should not be compromised by human activities,

³<https://designatedsites.naturalengland.org.uk/Marine/SupAdvice.aspx?SiteCode=UK0030369&SiteName=haisborough&SiteNameDisplay=Haisborough%2c+Hammond+and+Winterton+SAC&countyCode=&responsiblePerson=&SeaArea=&IFCAArea=>

⁴<https://designatedsites.naturalengland.org.uk/Marine/MarineFeatureCondition.aspx?SiteCode=UK0030369&SiteName=haisborough&SiteNameDisplay=Haisborough%2c+Hammond+and+Winterton+SAC&countyCode=&responsiblePerson=&SeaArea=&IFCAArea=>

Attribute		Target
		accepting that, due to the naturally dynamic nature of the feature, its extent will fluctuate over time.
		Restore the total extent and spatial distribution and types of reef (and each of its subfeatures).
	Structure and function: presence and abundance of key structural and influential species	Maintain OR Recover OR Restore the abundance of listed species, to enable each of them to be a viable component of the habitat.
	Structure: non-native species and pathogens	Restrict the introduction and spread of non-native species and pathogens, and their impacts.
	Structure: population density	Restore the density of <i>Sabellaria</i> species across the feature.
	Structure: species composition of component communities	Restore the species composition of component communities.
		Restore the species composition of the Sabellaria reef community.
	Supporting processes: areas with conditions suitable for reef formation	Restore the environmental conditions in those locations that are known, or which become known, to be important for <i>Sabellaria</i> reef formation.
		Maintain the natural rate of sediment deposition.
		Maintain natural levels of turbidity (e.g. concentrations of suspended sediment, plankton and other material) across the habitat
		Maintain the natural water flow velocity to the subtidal <i>Sabellaria</i> reefs, to provide high levels of oxygen, sediment supply and food.
Sandbanks	Distribution: presence and spatial distribution of biological communities	Restore the presence and spatial distribution of subtidal sandbank communities.
	Extent and distribution	Restore the total extent and spatial distribution of subtidal sandbanks to ensure no loss of integrity, while allowing for natural change and succession.
	Structure and function: presence and abundance of key structural and influential species	Maintain OR Recover OR Restore the abundance of listed species, to enable each of them to be a viable component of the habitat.
	Structure: non-native species and pathogens	Restrict the introduction and spread of non-native species and pathogens, and their impacts.
	Structure: sediment composition and distribution	Restore the distribution of sediment composition across the feature (and each of its sub-features).
	Structure: species composition of component communities	Restore the species composition of component communities.
	Structure: topography	Maintain the presence of topographic features, while allowing for natural responses to hydrodynamic regime, by preventing erosion or deposition through human-induced activity.
	Structure: volume	Maintain the existing (where no previous evidence exists) or best-known (where some evidence exists) volume of sediment in the sandbank, allowing for natural change.
	Supporting processes: sediment movement and hydrodynamic regime	Maintain all hydrodynamic and physical conditions such that natural water flow and sediment movement are not significantly altered or prevented from responding to changes in environmental conditions.

32. The species / communities listed by Natural England in the supplementary advice are:
- The infaunal and epifaunal communities found on the crests of sandbanks are relatively species poor as a result of the highly dynamic sediment environment and the associated impacts of disturbance, smothering and scour. The low diversity communities are dominated by polychaetes (primarily *Nephtys cirrosa* and *Ophelia* sp.) and the amphipods (*Bathyporeia elegans*, *Gastrosaccus* sp. and *Urothoe* spp.). Some brittlestars (*Ophiocten* sp.) and sandeel (*Ammodytes* sp.).
 - Slightly higher diversity communities consist of hardy polychaetes and amphipods approximate to the biotope A5.233 (*Nephtys cirrosa* and *Bathyporeia* spp. in infralittoral sand).
 - The areas of the site where sediment movements are reduced (flanks and troughs) support an abundance of attached bryozoans, hydroids and sea anemones. *S. spinulosa* and other tube building worms (e.g. keel worms and sand mason worms) are found, along with bivalves and crustaceans.



- Legend:
- Norfolk Boreas site
 - Offshore cable corridor
 - Project interconnector search area
 - Haisborough Hammond and Winterton Special Area of Conservation (SAC)¹

¹ JNCC, 2019.

Project: Norfolk Boreas	Report: Haisborough Hammond and Winterton SAC Cable Specification, Installation and Monitoring Plan
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Title:
Haisborough Hammond and Winterton SAC

Figure: 1.1 Drawing No: PB5640-007-012-001

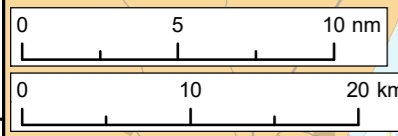
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Co-ordinate system: ETRS 1989 UTM Zone 31N EPSG: 25831

VATTENFALL

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2 CONSULTATION

2.1 Pre-consent

33. Following an initial draft submitted to Natural England and the MMO for review in April 2019, the Norfolk Vanguard Outline SIP was submitted to the Examining Authority at Deadline 7 (2nd of May) of the Norfolk Vanguard Examination. An updated version was then submitted at Deadline 9 of the examination (REP9-028). This Norfolk Boreas Outline HHW SIP is based on the version of the Norfolk Vanguard Outline SIP submitted to the Examining Authority at Deadline 9.
34. Natural England and the MMO made a number of comments on the Norfolk Boreas HHW SAC SIP in their Norfolk Boreas Relevant Representations (RR-069 and RR-099). These comments have resulted in additional mitigation being proposed by Norfolk Boreas Limited as detailed in section 5. Norfolk Boreas Limited have also undertaken further study in relation to the potential locations where cable protection could be required. This information is presented in Appendix 3.
35. Norfolk Boreas Limited also met with Natural England on the 21st October to discuss some of their comments on the outline SIP document and to outline the proposed additional mitigation provided in section 5.4.1. Natural England provided further comments at Deadline 4 of the Norfolk Boreas examination in their Updated Benthic Ecology Advice (REP4-038 in the Norfolk Boreas Examination Library) which have been reflected within this version of the document.
36. The MMO and Natural England will have further opportunity to review and provide comment on the Norfolk Boreas Outline HHW SIP during the Norfolk Boreas Examination. Norfolk Boreas Limited will continue to update the document as required throughout the examination process.

2.2 Post-consent

37. There will be an on-going requirement to engage with Natural England and the MMO throughout the detailed design stage of the project, including in the planning and review of pre-construction site investigation surveys in the HHW SAC, as well as during development of the final project design, construction plans and mitigation measures.

2.3 Project life

38. There will be an ongoing requirement to review and consult on the need for works associated with the maintenance of cables within the HHW SAC.

2.4 Schedule for Agreement

39. It is not possible at this stage to determine exact dates for agreement and refinement of the SIP as this will be determined by the final project timeline. However, key milestones are 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
Draft Norfolk Vanguard Outline SIP submitted for consultation	During Norfolk Vanguard examination (Q1 2019)	Draft Outline SIP was provided to MMO and Natural England for review	MMO and Natural England	Complete
Norfolk Vanguard Outline SIP submitted	During examination (Q2 2019)	Outline SIP submitted to the Examination	MMO and Natural England	Complete
Norfolk Boreas Outline SIP submitted as part of DCO application	June 2019	Outline SIP to be submitted as part of the DCO application	The Planning Inspectorate	Complete
Updated Norfolk Boreas Outline SIP submitted at Deadline 1 of the Norfolk Boreas Examination	November 2019	Updated Outline SIP submitted at Deadline 1 to capture all changes made to the Norfolk Vanguard Outline SIP at Deadline 9 for the examination for that project and proposed additional mitigation measures.	The Planning Inspectorate, the MMO and Natural England	Complete
Natural England provided further comments on Version 2 of the SIP (REP4-038)	February 2020	Update Outline SIP Submitted at Deadline 6 to reflect additional comments where possible.	Natural England	Complete
Updated Norfolk Boreas Outline SIP submitted at Deadline 6 of the Norfolk Boreas Examination	March 2020	Updated Outline SIP Submitted at Deadline 6 to capture additional commitments and mitigation	The Examining Authority, the MMO and Natural England	Complete
Further updates at the end of the Norfolk Boreas Examination	If required at relevant Deadlines	Update based on comments provided by MMO and Natural England during the Examination	MMO and Natural England	To be completed
Consent determination and Appropriate Assessment (AA)	Anticipated to be Q4 2020	Review Outline SIP, identify areas for revisions/updates	Internal only	To be completed
Design of Pre-construction surveys	Pre-construction	Natural England and the MMO will be consulted during the design of the pre-construction surveys to ensure they will provide the information required to develop the final SIP and associated mitigation measures	MMO and Natural England	To be completed

Indicative Stage	When	Action for Norfolk Boreas	Relevant Authority / Consultee	Status
Front End Engineering Design (FEED)	Pre-construction	Norfolk Boreas Limited will be refining the project design during the pre-construction period. Any updated project design will be considered in the SIP (see section 3).	Internal	To be completed
Submission and review of the draft full SIP and any associated documentation	Pre-construction, following site investigation surveys and FEED	The SIP will be updated to capture all relevant assessments and mitigation measures.	MMO and Natural England	To be completed
Iterations of the SIP, as required	Pre-construction, following site investigation surveys and FEED	The SIP will continue to be updated following review from MMO and Natural England and any further updates to the project design.	MMO, Natural England	To be completed
Final SIP sign-off	The DMLs set out certain timescales in advance of commencement of the licensed activities, by when the SIP must be submitted to the MMO for their approval	The SIP will be updated and finalised. The final SIP will be submitted to the MMO for approval at a timescale in accordance with the DMLs prior to the commencement of works associated with cable installation, including seabed preparation works, for written approval from the MMO prior to any works commencing in the HHW SAC. This will remain a live document that may need to be updated throughout the life of the project	MMO for sign off	To be completed
Construction monitoring and reporting	Construction (not expected before 2024)	Monitoring/management reports will be submitted to the MMO.	MMO	To be completed

3 CABLE INSTALLATION AND CABLE PROTECTION WITHIN THE HHW SAC

40. A full description of the project design envelope and worst case scenarios are available in the Norfolk Boreas ES (see ES (document reference 6.1) Chapter 5 Project Description, ES Chapter 8 Marine Geology, Oceanography and Physical Processes, ES Chapter 10 Benthic Ecology and section 7.3.3 of the Information to Support HRA report (document reference 5.3)). A summary of the worst case scenario for works associated with the HHW SAC is provided in Table 3.1.
41. However, as the final design progresses, this section of the Outline SIP will be completed to reflect the cable installation plan within the HHW SAC, including:
- Technical specification of the offshore export cables (including fibre optic cables)
 - A detailed cable (including fibre optic cables) installation plan for the Order limits, including:
 - Proposed cable installation vessel and equipment
 - A burial risk assessment to ascertain suitable burial depths and cable laying techniques, including cable protection
 - Export cable installation schedule
42. The information included within the HHW SIP will align with the cable specification, installation and monitoring plan required under Condition 9(1)(g) of the Transmission DMLs (Schedules 11 and 12 of the DCO).
43. Since the Norfolk Boreas DCO application was submitted, Norfolk Boreas Limited has committed to a number of additional mitigation measures which are further discussed in section 5. This includes the commitment to limit the maximum potential length of unburied cable in the HHW SAC to 5%. This is a reduction from the worst case scenario of 10% which was assessed in the ES. The reduction was based on an interim cable burial study (Appendix 2), which provides evidence that at least 95% of the export cable within the SAC could be buried.

Table 3.1 Worst Case Scenario in the HHW SAC

Impact	Parameter
Construction	
Temporary physical disturbance Annex I Sandbank	<ul style="list-style-type: none"> • Boulder clearance – 0.0008km² (up to 22 boulders of 5m diameter) being placed outside the cable route. • Pre-sweeping area – 0.25km² based on ES Appendix 5.1 Cable Installation Study, of this up to 0.05km² could be outside the footprint of the cable installation works. • Cable installation - 2.4km² (based on maximum potential disturbance width of 30m for a 10m wide plough with 10m of spoil either side of the trench, along 80km of export cable trenching within the SAC)

Impact	Parameter
	<ul style="list-style-type: none"> Anchor placement – 0.0003km² (based on two cable joints in the SAC, one per cable pair with a footprint of 150m² each, assuming up to 6 anchors per vessel) Other works (e.g. lifting of boulders and pre-lay grapnel run) associated with cable installation would be encompassed by the footprints outlined above. Therefore, the total footprint for temporary disturbance on sandbanks is 2.45km² <p>Dredged material will be disposed of within the SAC (see section 5.4 for further detail). The area affected by these disposal sites will be agreed with the MMO in consultation with Natural England. As discussed in the Sandwave Study by ABPmer (Appendix 7.1 of the Information to Support HRA report (document reference 5.3.7.1)), deposited sediment will immediately re-join the local and regional sediment transport system. The area affect will be in addition to the 2.45km² presented here.</p>
Temporary physical disturbance on Annex I Reef	Cable installation works as outlined above, however the location and extent of <i>S. spinulosa</i> reef and therefore the overlap of the installation works with reef feature is unknown and will be detailed in the final SIP based on the pre-construction surveys.
Operation	
Temporary physical disturbance on Annex I Sandbank	<ul style="list-style-type: none"> An average of one repair per export cable pair every 10 years is estimated within the SAC. It is estimated that 300m sections would be removed and replaced per repair. Disturbance width of 10m = 3,000m² (0.003km²) per repair Anchor placement associated with repair works = 150m² based on 6 anchors per vessel Reburial of up to up to 10% of the cable length (4km per pair) every 5 years may be required should pre-sweeping <u>not</u> be undertaken. The disturbance width would be approximately 10m and therefore the total disturbance would be 80,000m² (0.08km²) every 5 years or approximately 480,000m² (0.4km²) over the indicative 30 year project life. If reburial is required, it is likely that this would be in relatively short sections (e.g. 1km) at any one time. If pre-sweeping is undertaken the requirement for (and likelihood of) cable reburial would be significantly reduced. The SIP requires that the installation strategy (e.g. use of pre-sweeping) is agreed with the MMO in consultation with Natural England.
Temporary physical disturbance on Annex I Reef	Maintenance works as estimated above, however the location and extent of <i>S. spinulosa</i> reef and therefore the overlap of the maintenance works with reef feature is unknown and will be detailed in the final SIP based on the pre-construction surveys.
Persistent habitat loss on Annex I Sandbank	<p>Total habitat loss within the Haisborough, Hammond and Winterton SAC could be 0.028km² (0.0019% of the 1,468km² SAC area and 0.004% of the area of sandbanks within the SAC) based on the following:</p> <ul style="list-style-type: none"> <0.001km² clump weights based on cutting two existing disused cables and placing clump weights of up to 5m² on either end of the disused cables. Four* crossings for each of the export cable pair (eight crossings in total) within the Haisborough, Hammond and Winterton SAC with a total footprint of 8,000m² in the SAC (100m length per crossing and 10m width of protection).

Impact	Parameter
	<ul style="list-style-type: none"> A contingency of up to 2km of cable protection per cable pair, 4km in total (5% of the length) could be required in the Haisborough, Hammond and Winterton SAC in the unlikely event that unsuitable ground conditions are encountered, resulting in a footprint of 20,000m² based on 5m width of cable protection.
Permanent habitat loss of Annex I Reef	The worst case footprint of permanent infrastructure would be as outlined above, however, where cable protection is required due to pipeline / cable crossings, this is not considered Annex I reef, in accordance with Natural England advice. Furthermore, the location and extent of <i>S. spinulosa</i> reef and therefore the overlap of the infrastructure with reef feature is unknown and will be detailed in the final SIP based on the pre-construction surveys. It is expected that there will be no loss of reef where micrositing can be undertaken (section 5.2). <i>S. spinulosa</i> can also be expected to colonise cable protection, although Norfolk Boreas Limited recognises that Natural England does not consider this to be Annex I reef.
Decommissioning	
Temporary physical disturbance	Some or all of the offshore export cables may be removed. Cable protection will be removed except at cable crossings where this would be left <i>in situ</i> .

* Norfolk Boreas Limited has been working with the owners of disused cables within the HHW SAC and is confident that the number of cable crossings per cable within the SAC will be reduced further from four down to two (see section 5.5.1 for further information). This would reduce the maximum area of cable protection associated with crossings from 8,000m² down to 4,000m².

3.1 Pre-construction surveys

44. This section will provide detail of the relevant pre-construction surveys that will be required to inform cable installation and cable protection in accordance with the In-Principle Monitoring Plan (document 8.12), including:
- Geophysical survey within the offshore cable corridor in the HHW SAC;
 - Targeted *S. spinulosa* reef surveys within the offshore cable corridor in the HHW SAC (through the interim and pre-construction surveys);
 - Geotechnical assessment of the seabed within the offshore cable corridor in the HHW SAC; and
 - Unexploded ordnance (UXO) survey.
45. Details of the final cable route and micrositing within the HHW SAC will be provided in the final HHW SAC SIP, informed by the pre-construction surveys.

3.2 Cable Burial Risk Assessment

46. This section will summarise the cable burial risk assessment which will be undertaken for the project. Once the risk assessment has been completed this section will include the following information:
- Overview of the risk assessment;
 - Overview of the site (bathymetry and seabed sediments);
 - Sandwaves;
 - Megaripples;
 - Till outcrops;
 - Steep Slopes; and
 - Boulders and Debris

3.3 A Sandwave Characterisation Study

47. This section will contain a summary of the sandwave characterisation study which will be undertaken within the cable route that overlaps with HHW SAC.

3.4 Cable installation strategy

48. This section will detail the steps involved in the export cable installation process of relevance to the HHW SAC once known, including:
- Seabed preparation;
 - Cable route clearance;
 - Placement of cable protection; and
 - Cable installation method statement.

49. The installation strategy will be informed by a burial tool capability study. A summary of the study will be provided here and the study itself provided in a technical Appendix.

3.5 Cable Protection Plan

50. As detailed in the cable burial risk assessment summary above, there is the potential for target burial depth to not be achieved along sections of the export cable route within HHW SAC. Once available, this section will provide the following information:
- Decision making process on burial and protection;
 - Type of cable protection;
 - Location of cable protection (see Annex 3 Likely Cable Protection Locations);
 - Installation method of cable protection;
 - Cable Crossings cable protection, and
 - Consideration of risks to other sea users, e.g. snagging of fishing gear and vessel anchors.

4 ASSESSMENT OF NO ADVERSE EFFECT ON INTEGRITY

51. The Information to Support HRA Report (document reference 5.3) provides an assessment of the potential effects based on the worst case scenario of the design envelope.
52. In order to conclude no AEoI on the HHW SAC as a result of offshore cable installation (including seabed preparation works and cable protection) and maintenance for Norfolk Boreas, the SIP will provide a review of the potential effects on site integrity based on the final detailed design (to be provided in section 3). This will take into account the preferred cable route and installation methods, as well as the substrate type and up-to-date habitat data from the pre-construction surveys.
53. Mitigation measures would be identified following this process to ensure effects are minimised and to allow the conclusion of no AEoI (see Section 5). This will allow mitigation measures to reflect the current status of the features of the HHW SAC.
54. The Statutory Nature Conservation Body (SNCB) Draft Conservation Objectives and Advice on Operations (JNCC & Natural England, 2009) and Formal advice under Regulation 35(3) of The Conservation of Habitats and Species Regulations 2010 (as amended), and Regulation 18 of The Offshore Marine Conservation Regulations (Natural Habitats, &c.) Regulations 2007 (as amended) (JNCC & Natural England, 2013) identifies the following pressures that are of relevance to Norfolk Boreas:
 - Physical loss; and
 - Physical damage (i.e. disturbance).
55. The Information to Support HRA Report provides consideration of the following impacts and scenarios:
 - Disturbance to Sandbanks during construction (Information to Support HRA Report section 7.4.1.1.1);
 - Disturbance to Sandbanks during maintenance (Information to Support HRA Report section 7.4.1.1.2 under the title “Temporary physical disturbance”);
 - Sandbank habitat loss from cable protection (Information to Support HRA Report section 7.4.1.1.2 under the title “Permanent habitat loss”);
 - Disturbance to reef if micro-siting is possible (Information to Support HRA Report section 7.4.2.1.1 under the title “Temporary physical disturbance” paragraph 510 to 515);
 - Disturbance to reef if micro-siting is not possible (Information to Support HRA Report section 7.4.2.1.1 under the title “Temporary physical disturbance” paragraph 516 to 535);
 - Disturbance to Reef during maintenance (Information to Support HRA Report section 7.4.2.1.2); and

- In-combination effects (Information to Support HRA Report section 7.4.2.2).
56. Norfolk Boreas Limited concludes there would be no AEoI of the HHW SAC, however it is recognised that Natural England has identified uncertainty associated with the assessment (e.g. the extent of Reef at the time of construction and therefore the ability to microsite cables). As a result of this uncertainty, Norfolk Boreas Limited has committed to a SIP to provide a framework to further assess the effects based on the best available information prior to construction. The wording of the Transmission DMLs (DCO Schedules 11 and 12), Condition 9(1)(m) ensures that a conclusion of ‘no adverse effect beyond reasonable scientific doubt’ (no AEoI) can be made at the consenting stage as construction cannot commence until the MMO (in consultation with Natural England) is satisfied that there is no AEoI on the HHW SAC. Section 5 of this document outlines the process and commitments to delivering mitigation measures to ensure no AEoI.
57. Further to the above Norfolk Boreas Limited have committed to additional mitigation measures that provide more certainty that the project would have no AEoI. These mitigation measures are detailed in section 5.4.1.
58. Norfolk Boreas Limited has undertaken further work in response to a request for more information contained in Appendix 2.5 of Natural England's Relevant Representation for the Norfolk Boreas Project (RR-099). The information, presented within Appendix 3 of this document demonstrates that any cable protection necessary in the event that cable burial is not possible is very unlikely to be placed within the areas that Natural England and the JNCC have identified as “areas to be managed as *S.spinulosa* reef”.
59. This work has also led to an additional commitment not to install any cable protection in the priority areas to be managed as reef within the HHW SAC, unless otherwise agreed with the MMO in consultation with Natural England. As part of this additional commitment, an assessment of the impacts of cable protection on Annex I *S.spinulosa* reef has been completed (ExA.AS-1.D10.V1).

4.1 Fisheries closure area

60. Two fisheries closure areas have been proposed within the HHW SAC (one by DEFRA and one by Eastern Inshore Fisheries and Conservation Authority (IFCA)) which, if implemented, would overlap with the Norfolk Boreas offshore cable corridor. The proposed closure areas have not yet been formally ratified and would not apply to Norfolk Boreas as they relate specifically to restrictions on bottom towed fishing gear.
61. The closure areas have been identified with the aim of protecting two priority areas to be managed as reef (Figure 4.1). These areas have been

identified as those where the existing reef has the potential to increase in extent if the recurring impact from bottom towed fishing gear ceases in these areas.

62. With regards to the larger area (shown as dark purple in Figure 4.1) which underpins the DEFRA Joint Recommendation (DEFRA, 2016), this area is not extensively reef but has been identified as having potential to become reef if the recurring impact from bottom towed fishing gear is ceased in these areas. As discussed in section 1.4.1, *S. spinulosa* reef in the HHW SAC is considered to be in unfavourable condition.
63. Should the closure areas be implemented, they would continue to be subject to review and could be increased or decreased, where evidence supports such a change. Section 5.2 outlines the process that will be undertaken by Norfolk Boreas Limited to minimise impacts on these priority management areas.

4.2 Revised Assessment

64. As discussed above, in order to conclude no AEoI on the HHW SAC, the final SIP will provide a review of the potential effects on site integrity based on the following:
 - Final detailed design (to be provided in section 3), including the preferred cable route and installation methods,
 - Up-to-date habitat data from the pre-construction surveys.
65. An outline of the approach is provided in sections 4.2.1 to 4.2.4 below.

4.2.1 Interim habitat mapping

66. A survey will be completed in 2020 to map the current extent of *S. spinulosa* reef within areas of the Order limits in which it is proposed to carry out construction works within the SAC. This survey will be used to inform both the Norfolk Vanguard and Norfolk Boreas SIP.
67. Approximately two years prior to construction on Norfolk Boreas the pre-construction surveys undertaken by Norfolk Vanguard (secured under Condition 13 of the Transmission DMLs) will be available to further inform the Norfolk Boreas SIP.

4.2.2 Pre-construction habitat mapping

68. Norfolk Boreas Limited has also committed to undertaking a pre-construction survey in accordance with Condition 13 of the Transmission DMLs (Schedules 11 and 12 of the DCO) which will inform the final design (to be presented in Section 3), as well as informing the review of potential effects on site integrity and requirements for mitigation.

69. The survey will be undertaken within 12 months of construction commencing, in order to:
- Determine the location and extent of any *S. spinulosa* reef within areas of the Order limits in which it is proposed to carry out construction works within the SAC to inform the appropriate mitigation if found; and
 - Provide a high-level biotope habitat map for the Order limits within the SAC.

4.2.3 Sensitivity

70. The sensitivity of biotopes recorded during the pre-construction surveys will be determined based on the latest available information (e.g. the Marine Evidence based Sensitivity Assessment (MarESA)⁵. Where sensitivity information is unavailable, an appropriate proxy biotope or expert judgement will be agreed with the MMO in consultation with Natural England.

4.2.4 Potential AEol

71. Natural England (2019b) states that there are no thresholds for determining an AEol, however in order for Natural England to advise that there is no likelihood of an AEol, the project would need to demonstrate the following:
- *“That the loss is not on the priority habitat/feature/ sub feature/ supporting habitat; and/or*
 - *That the loss is temporary and reversible (within guidelines above); and/or*
 - *That the scale of loss is so small as to be de minimis alone; and/ or*
 - *That the scale of loss is inconsequential including other impacts on the site/ feature/ sub feature”.*
72. A map will be produced showing the final offshore export cable route and location of cable protection, along with the pre-construction habitat and *S. spinulosa* reef mapping to identify the predicted exposure of each habitat to pressures associated with Norfolk Boreas. The maps would be informed by the interim survey to be completed in 2020 and the Norfolk Vanguard and Norfolk Boreas pre-construction surveys (to be completed approximately two years and one year prior to the construction of Norfolk Boreas). The results would be used to determine whether any loss or disturbance is on a priority habitat/feature/sub-feature/supporting habitat and therefore whether further consideration of the reversibility or scale is required.
73. Consideration of the scale of loss would be undertaken for the HHW SAC as a whole, based on the 1,467.59 km² (146,759 hectares (ha)) total site area. Consideration will also be given to the scale of loss on a feature based on the following areas quoted in

⁵ https://www.marlin.ac.uk/sensitivity/sensitivity_rationale

the Natura 2000 Standard Data Form⁶ subject to further available information at the time of completing the SIP:

- Sandbanks 668.928km² (66,892.8ha)
 - Reef 0.88km² (88.06ha).
74. It is unlikely that it will be possible to determine the scale of loss for a sub-feature. This would require habitat mapping across the whole HHW SAC to determine the extent of sub-features. This is beyond the scope of Norfolk Boreas.
75. Mitigation associated with minimising the effect on features of the HHW SAC is outlined in section 5.

⁶ <http://natura2000.eea.europa.eu/Natura2000/SDF.aspx?site=UK0030369>

5 MITIGATION

76. Norfolk Boreas Limited is committed to minimising potential effects on the HHW SAC. As outlined in section 4, the final SIP will provide a review of the potential effects on site integrity based on the final project design and pre-construction survey data for the HHW SAC. Following this process, mitigation measures will be refined and updated on the basis of the principles outlined in the sections below and the commitments provided in section 5.6, to ensure effects are minimised and to allow the conclusion of no AEOI.
77. For the mitigation measures identified, information will be provided in the final SIP to detail how the measure will allow the conclusion of ‘no adverse effect on integrity beyond reasonable scientific doubt’ on the HHW SAC.

5.1 Embedded mitigation

78. During the pre-application stage, Norfolk Boreas Limited made the following commitments, informed by consultation with Natural England and the MMO through the Evidence Plan Process.

5.1.1 Minimising export cabling

79. Norfolk Boreas Limited has taken the decision to use a High Voltage Direct Current (HVDC) export solution in order to reduce the number of cables and cable protection. This results in the following mitigating features:
- There will be two cable trenches instead of six for Norfolk Boreas (and the same for Norfolk Vanguard);
 - The volume of sediment arising from pre-sweeping and cable installation works is reduced by 67%;
 - The area of disturbance for pre-sweeping and cable installation is reduced by 67%;
 - The space required for cable installation is reduced, increasing the space available within the cable corridor for micro-siting to avoid constraints such as *S. spinulosa* reef if necessary;
 - The potential requirement for cable protection in the unlikely event that cables cannot be buried is reduced due to the reduction in the number of cables; and
 - The number of export cables required to cross existing cables and pipelines and the associated cable protection is reduced.

5.1.2 Pre-construction *S.spinulosa* reef Surveys

80. Up to three surveys will be undertaken to map the extent of *S.spinulosa* reef for the locations of proposed works within the SAC. The first of which is an interim survey

which is being planned for 2020. The scope of this survey will be agreed with the MMO and Natural England and it will encompass the full section of the offshore cable corridor that overlaps with the SAC. The results of this survey will be used to start cable route planning for both Norfolk Boreas and Norfolk Vanguard.

81. The Norfolk Boreas pre-construction survey will be undertaken within 12 months of any cable installation works and the methodology for the pre-construction surveys will be agreed with the MMO in consultation with Natural England. The results of this survey will be used to make final refinements to the cable routing including micrositing where possible (see section 5.2).
82. Pre-construction surveys from the Norfolk Vanguard project could also be available approximately two years prior to construction of the Norfolk Boreas project to inform cable route planning.

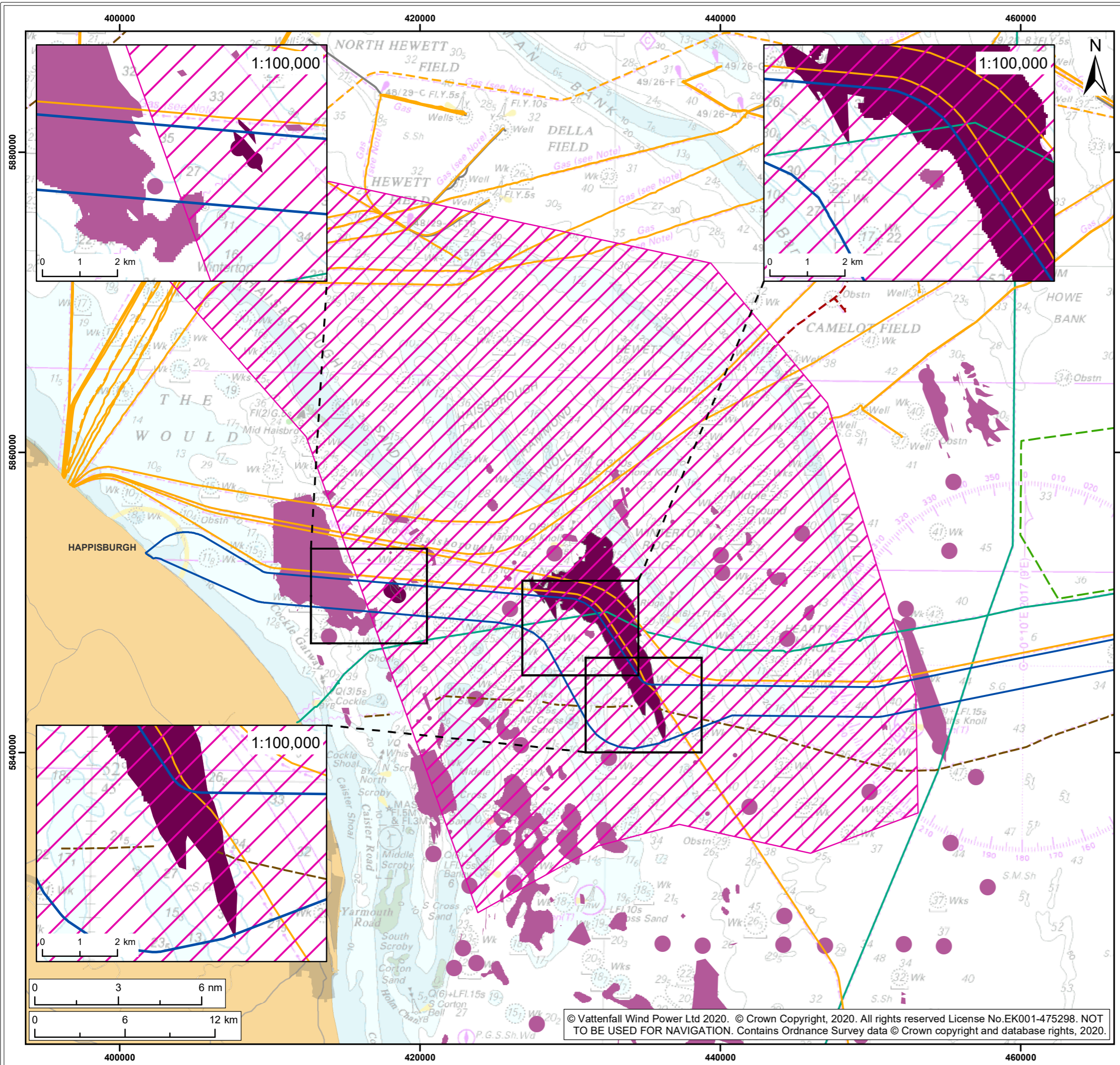
5.2 Micrositing

83. Norfolk Boreas Limited is committed to micrositing around Annex I reef where there is sufficient space to do so. This will be based on the extent of reef identified during interim surveys (due to commence in 2020), Norfolk Vanguard pre-construction surveys, if available (likely to be available two years prior to construction) and Norfolk Boreas pre-construction surveys and the two priority Areas to be Managed as Reef (Figure 4.1). The commitments made by Norfolk Boreas Limited to date (section 5.1), in particular the HVDC export solution to decrease the number of cable trenches from six to two, greatly increases the likelihood that micrositing will be possible.
84. As discussed in section 5.1.2 and section 4.2.1, a pre-construction survey would be undertaken within 12 months of any cable installation works and the results of this survey would inform the final routing/micrositing of cables.
85. The initial interim survey will be used to plan the cable routes for the two Norfolk Boreas cable trenches as well as the two Norfolk Vanguard⁷ trenches. The Norfolk Vanguard pre-construction survey and the Norfolk Boreas pre-construction surveys would then be used to further refine the route to take account of any *S.spinulosa* reef that had established in the interim period.
86. Depending on the duration between cable installation, further pre-construction surveys may be required to ensure these are undertaken within 12 months of the installation works. Further small scale micrositing would be undertaken where possible within the confines of the initial cable route plan, should reef have developed since the first pre-construction survey. Plate 5.1 shows the process of

⁷ This document relates to Norfolk Boreas alone, however consideration will also be given to Norfolk Vanguard to ensure mitigation solutions are compatible for both projects.

identifying micrositings mitigation following the interim and pre-construction surveys. This reflects Norfolk Boreas Limited's commitment to avoiding areas of reef identified during the pre-construction surveys and to take routes which would have the least effect on the two priority Areas to be Managed as Reef (Figure 4.1).

87. As shown in Plate 5.1 should there not be sufficient space to route cables around reef identified during the interim and pre-construction surveys, the route which would result in the least temporary disturbance would be proposed. This route would then be subject to further assessment and a conclusion of no AEoI would have to be reached by the MMO in consultation with Natural England. If such a finding could not be reached, construction could not commence and the onus would be on Norfolk Boreas Limited to consider alternative solutions. For example, this could include: minor amendments to the redline boundary in discrete areas where the cable route interacted with reef to provide space for micrositings; or a variation to the Transmission DML Condition 9(1)(m) to allow a finding of AEoI should the project satisfy the HRA Assessment of Alternatives, Imperative Reasons of Overriding Public Interest (IROPI) and Compensatory Measures tests.
88. The detailed cable route, including micrositings will be determined based on the results of the interim and pre-construction surveys and must be agreed with the MMO in consultation with Natural England before any installation works, including seabed preparation can commence.



Legend:

- Offshore cable corridor
- Project interconnector search area
- Haisborough Hammond and Winterton Special Area of Conservation (SAC)¹
- Priority areas to be managed as *S. spinulosa* reef²
- Potential areas to be managed as *S. spinulosa* reef²

Subsea Cables³

- Active
- Disused

Pipelines⁴

- Abandoned
- Active
- Precommission
- Not in use

¹ JNCC, 2019
² Natural England/MALSF, 2013/2011
³ KisOrca, 2018.
⁴ Oil & Gas UK Ltd, 2019.

Project: Norfolk Boreas	Report: Haisborough Hammond and Winterton SAC Site Integrity Plan
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Title:
Annex I Reef identified in the Norfolk Boreas offshore cable corridor within the SAC

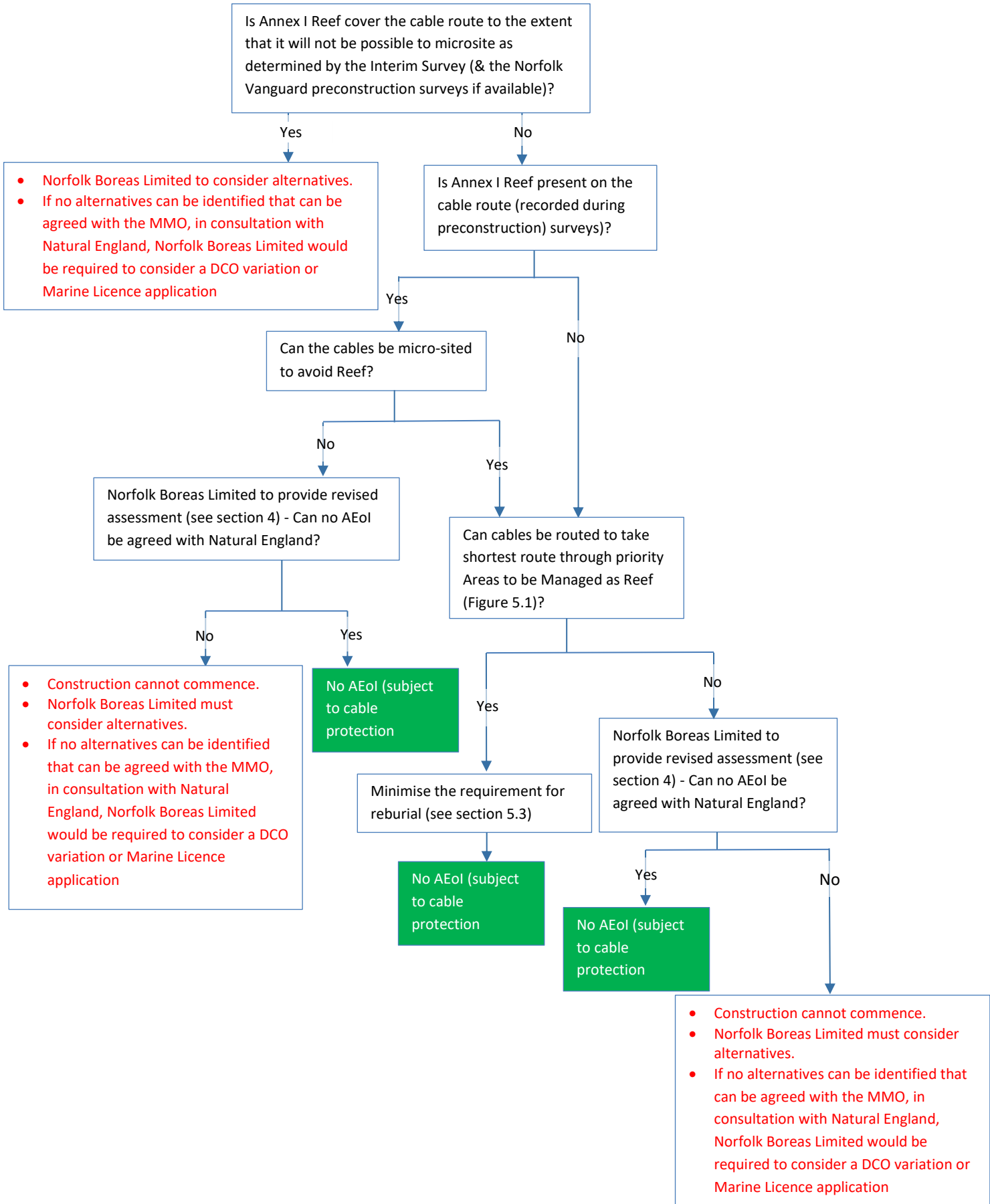
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03	10/02/2020	JT	KC	A3	1:250,000

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

VATTENFALL

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Plate 5.1 Micrositing around Annex I Reef decision process



5.2.1 Likelihood of Successful Micrositing

89. As discussed in the Information to Support HRA report (document reference 5.3), Norfolk Boreas and Norfolk Vanguard Limited commissioned a Cable Constructability Assessment to be completed by Global Marine Systems Ltd (provided in Appendix 4.2 of the ES) to determine an appropriate cable corridor width of approximately 2km to 4.7km. This study along with all the site selection work has been undertaken for a combined corridor for Norfolk Boreas and Norfolk Vanguard projects.
90. The space available for micrositing within the offshore cable corridor where it overlaps with the HHW SAC is approximately 1.05km along most of the route (where the corridor width is 2km), with up to 3.75km of micrositing available in the 'dog-leg' area (where the corridor width is 4.7km). This takes into account the space required for Norfolk Boreas export cables⁸. The space available for micrositing is calculated using the following worst case scenario:
- Up to four export cable trenches (four cables in two trenches for Norfolk Boreas and four cables in two trenches for Norfolk Vanguard) with spacing as shown in Plate 5.2;
 - The cable corridor is typically 2km in width, with a wider section of up to 4.7km where there is a dog-leg in the corridor within the SAC;
 - A total width of approximately 1.35km is required for Norfolk Boreas and Norfolk Vanguard; which includes up to four cables (laid in pairs, i.e. two trenches) for each project, a contingency of 440m (0.4km), an anchor placement zone, and a buffer for potential anchor placement and cable replacement works (GMSL, 2016 unpublished; Plate 5.2); and
 - The remaining width of the offshore cable corridor within the SAC is therefore approximately 0.65km to 3.35km plus the built-in contingency of 0.4km, resulting in approximately 1.05km to 3.75km available for micrositing.

⁸ This SIP is for Norfolk Boreas alone, however the space available for micrositing within the cable corridor must take account of Norfolk Vanguard.

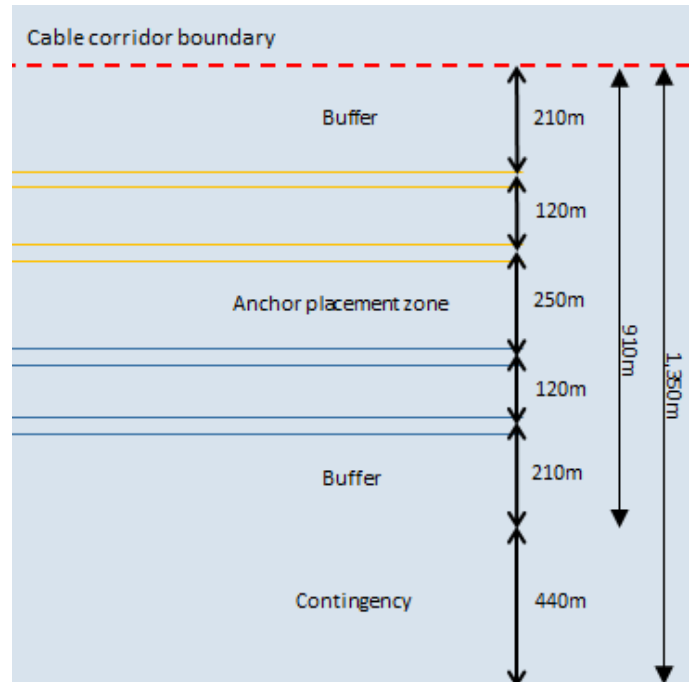


Plate 5.2 Export cables layout (two pairs of cables for Norfolk Boreas (blue) and two pairs of cables for Norfolk Vanguard (yellow)) based on 48m water depth⁹

91. There are currently three different electrical solutions being considered for the Norfolk Boreas project. Two of these three solutions would result in Norfolk Boreas only requiring a single export cable to be located within the HHW SAC.

5.3 Cable installation and seabed preparation

92. As described above, the commitments made by Norfolk Boreas Limited to date (section 5.1), in particular the HVDC export solution, greatly reduce the impact area and duration of cable installation by reducing the number of cable trenches from six to two.
93. Cables will be buried where the substrate allows burial to a depth of at least 1m. Should burial not be possible (e.g. in hard clay and sedimentary rocks), the approach to remedial action under these conditions (e.g. a requirement for cable protection) would be agreed with the MMO in consultation with Natural England (see section 5.5.2).
94. In response to requests from Natural England during the Norfolk Vanguard Examination, an Interim Cable Burial Study was commissioned (Norfolk Vanguard Limited, 2019) which was based on geophysical, geotechnical and environmental survey carried out by Fugro Survey B.V. in 2016 with 100% coverage of the offshore export cable corridor, including the area within the HHW SAC. The study which

⁹ The separation between cables is determined by the potential space required to undertake a cable repair which is a factor of the water depth. Depth in the SAC is less than 48m and therefore this represents a conservative worst case scenario

considered both Norfolk Boreas and Norfolk Vanguard export cables has identified that at least 95% of the offshore export cable length within the HHW SAC is likely to be able to be buried. Therefore following the submission of the Norfolk Boreas DCO application in June 2019 the Norfolk Boreas project design envelope has also incorporated the assumption that 95% of the export cable will be buried and therefore less cable protection than was assessed within the ES and Information to support HRA will be required.

95. Section 5.4.13 of ES Chapter 5 provides a description of the cable laying process, including seabed preparation and potential installation methods. This includes:
- Boulder clearance (if required)
 - Pre-lay grapnel run
 - An option of pre-sweeping to level sandwaves to a reference seabed level that would minimise the potential for cables becoming unburied
 - Cable burial methods, e.g.:
 - Ploughing
 - Trenching or cutting
 - Jetting
96. There will be a minimum separation of 75m between cable pairs (as shown in Figure 11 of the Export Cable Installation Study, ES Appendix 5.2) and the maximum width of disturbance from cable installation is 37m (section 7.3.3.2.1 of the Information to Support HRA report), therefore there would be no repeated disturbance of the same footprint during construction.
97. If sandwave levelling is undertaken as part of the installation strategy, this would be completed at an appropriate period before the installation of each cable pair to ensure that recovery of sandwaves does not occur prior to the installation of cables. This is likely to be in the order of weeks prior to cable installation.
98. Where substrate conditions allow, the cable installation strategy in the SAC would aim to bury cables below the mobile sandwaves to avoid or minimise the requirement for re-burial of cables during the operational phase. This will be considered through the design and execution of the installation process, taking account of relevant knowledge regarding seabed morphology and mobility. In order to achieve this aim, it is acknowledged that some seabed preparation activities may be required prior to cable installation. While appropriate steps should be taken to control and mitigate the additional impacts of these works (e.g. sediment disposal, see section 5.4), the aim of securing the long-term burial and protection of the cables is the priority.

99. Norfolk Boreas Limited acknowledges that Natural England has experienced situations (notably during and after the construction of other offshore wind projects in the Greater Wash area) where the outcome of cable installation operations has fallen short of the undertakings that were made by developers and contractors prior to construction. Norfolk Boreas can benefit from this experience, and underpin the proposed plans (i.e. detailed design and installation methodology) by establishing a comprehensive evidence base to provide confidence that execution of the burial strategy will meet the relevant burial requirements. Where applicable, this should be achieved by citing previous projects where similar design approaches, installation methods and tools have been used together with evidence that comparable, successful outcomes were achieved. Norfolk Boreas will be in a unique position when finalising its plans for export cable installation as it will be able to draw upon the site-specific experience of its sister project, Norfolk Vanguard. This will enable Norfolk Boreas to have a very high degree of confidence in the predicted outcomes.
100. Table 5.1 outlines a scope of work that Norfolk Boreas Limited intends to carry out in order to develop detailed plans for installation of cables in the HHW SAC, and the associated evidence base to support these plans.
101. The methodology will be informed by the pre-construction survey data and any available evidence from Norfolk Vanguard and any other relevant projects and must be agreed with the MMO in consultation with Natural England.

Table 5.1 Process for identifying a burial strategy

Brief description	Activities and aims
Learning from other projects	Norfolk Boreas Limited will undertake a 'lessons learned' exercise focusing on other projects with challenges regarding installation of subsea cables (including that of Norfolk Vanguard, if appropriate) in mobile sediments. The aim will be to identify the key areas of under-performance, the primary causes of the under-performance, and 'steps to take' to avoid similar adverse outcomes.
Identifying successes	Norfolk Boreas Limited will undertake a review of subsea cable installation projects which have also faced challenges relating to mobile sediments, but where burial objectives were generally achieved. The aim will be to compile evidence relating to successful design approaches, methods and tools.
Designing interim survey of SAC	Norfolk Boreas Limited will design an interim offshore survey campaign to inform the development of the SIP. The primary aim of the survey will be to inform understanding of the extent and character of <i>Sabellaria</i> reef within the cable corridor.
Execution of interim survey	Norfolk Boreas Limited will procure and manage the survey activity as per the survey design (see previous row). This survey is being planned and is due to commence in 2020.
Defining burial targets	Norfolk Boreas Limited will undertake a geotechnical assessment of the seabed in the SAC, and a Cable Burial Risk Assessment (CBRA) to determine the required depth of burial for the export cables through the SAC.
Burial tool capability study	Norfolk Boreas Limited will undertake a review of the burial tool market, informed by the initial geotechnical and CBRA work described above. The aim will be to identify tools that will be suitable for the burial requirements in the SAC, and to define the key technical requirements (relating to tool design and burial capability) to be used for procurement of the cable installation contract.
Sandwave characterisation study - cable installation strategy	Norfolk Boreas Limited will undertake a sandwave characterisation study, focusing on the part of the cable corridor that falls within the SAC. In parallel, Norfolk Boreas Limited will also develop a strategy for installation of cables through areas of sandwaves. This strategy will define the seabed preparation works that would be

Brief description	Activities and aims
	<p>required, the required timing of these works in relation to the cable installation activity, and the relationships between the preparation works, the reference seabed level, the target burial depth and the capability of the burial tool itself. The strategy will also consider the suitability of different methods/tools for sandwave levelling, and the selection of areas in the SAC for disposal of seabed material arising from this process.</p> <p>The final SIP will contain a pre-construction sandwave levelling report as requested by Natural England within their Relevant Representation (RR-099).</p>

5.3.1 Further mitigation

Following the publication of the relevant representation made by Natural England (RR-099) where Natural England state “*Examples of mitigation measures undertaken by other activities in HHW SAC include reduction of footprint associated with vessel stabilisation through use of alternative work vessels*” Norfolk Boreas Limited have made the commitment not to use Jack-up vessels within the SAC and will use alternative work vessels in the SAC during the construction and operation of the Norfolk Boreas project.

5.4 Sediment disposal

102. Norfolk Boreas Limited has committed to the depositing of sediment removed from the seabed within the HHW SAC back into the SAC to ensure no sediment is lost from the system, enabling recovery of the sandbanks (discussed further in section 5.4 of Appendix 7.1 of the Information to Support HRA report (document reference 5.3.7.1)). Further commitment to additional mitigation designed to ensure this process occurs rapidly has also been made (see section 5.4.1).
103. A disposal licence is being applied for as part of the Norfolk Boreas DCO application which will include the Norfolk Boreas Order Limits within the HHW SAC. Up to 500,000m³ of sediment may be dredged from the SAC over an area of 250,000m². Any sediment arising from the SAC will be deposited within the SAC based on the analysis of pre-sweeping volumes presented in ES Appendix 5.2 Cable Installation Study. The final HHW SAC CSIMP will contain a detailed a pre-construction sandwave levelling report.
104. The location(s) of sediment disposal, must include a minimum buffer of 50m from *S. spinulosa* reef, and will therefore be informed by the pre-construction surveys.
105. The methodology for disposal will be informed by the detailed design following the interim and pre-construction surveys. The detail of the agreed Sediment disposal strategy within the SAC will be provided within the final HHW SIP.
106. A primary aim of the sediment disposal strategy (i.e. locations and methodology for disposal) will be to facilitate recovery. The strategy will therefore also be informed by any available evidence regarding recovery from other relevant projects and the commitments made to expedite recovery presented in section 5.4.1.

107. The location(s) and methodology for disposal must be agreed with the MMO in consultation with Natural England before works can commence.

5.4.1 Further mitigation

108. Following the publication of the relevant representation made by Natural England (RR-099) and the MMO (RR-069) and additional consultation with both organisations, Norfolk Boreas have committed to the following additional mitigation measures should sandwave levelling be permitted. These measures are designed to provide further confidence that no AEoI on the HHW SAC can be concluded. Norfolk Boreas Limited will:

- Dispose of any material dredged from the seabed for sandwave levelling (also referred to as pre-sweeping) in a linear “strip” along the cable route.
- Dispose of material close to the seabed. This will be achieved through the use of fall pipe (also referred to as a down pipe) employed by the dredging vessel.
- Always attempt to bury any exposed cable within the HHW SAC prior to installing additional cable protection (placement of cable protection in new areas would be subject to a separate marine licence, see the Outline Operation and Maintenance Plan document reference 8.11 for further details).
- No use of Jack up vessels within the HHW SAC.

5.4.1.1 Disposal of dredged material in a linear strip close to the seabed

109. It is recognised that it may not be possible to observe all the criteria proposed for sediment disposal at all locations and therefore when determining the location of disposal areas within the SAC the following criteria would be used:

- Priority 1 – material to be disposed of no closer than 50m to any *S.spinulosa* reef (see section 5.4).
- Priority 2- Dispose of material up drift of the cable route, to allow infill to occur as quickly as possible following cable installation.
- Priority 3 - Dispose of material as close as possible to cable route.

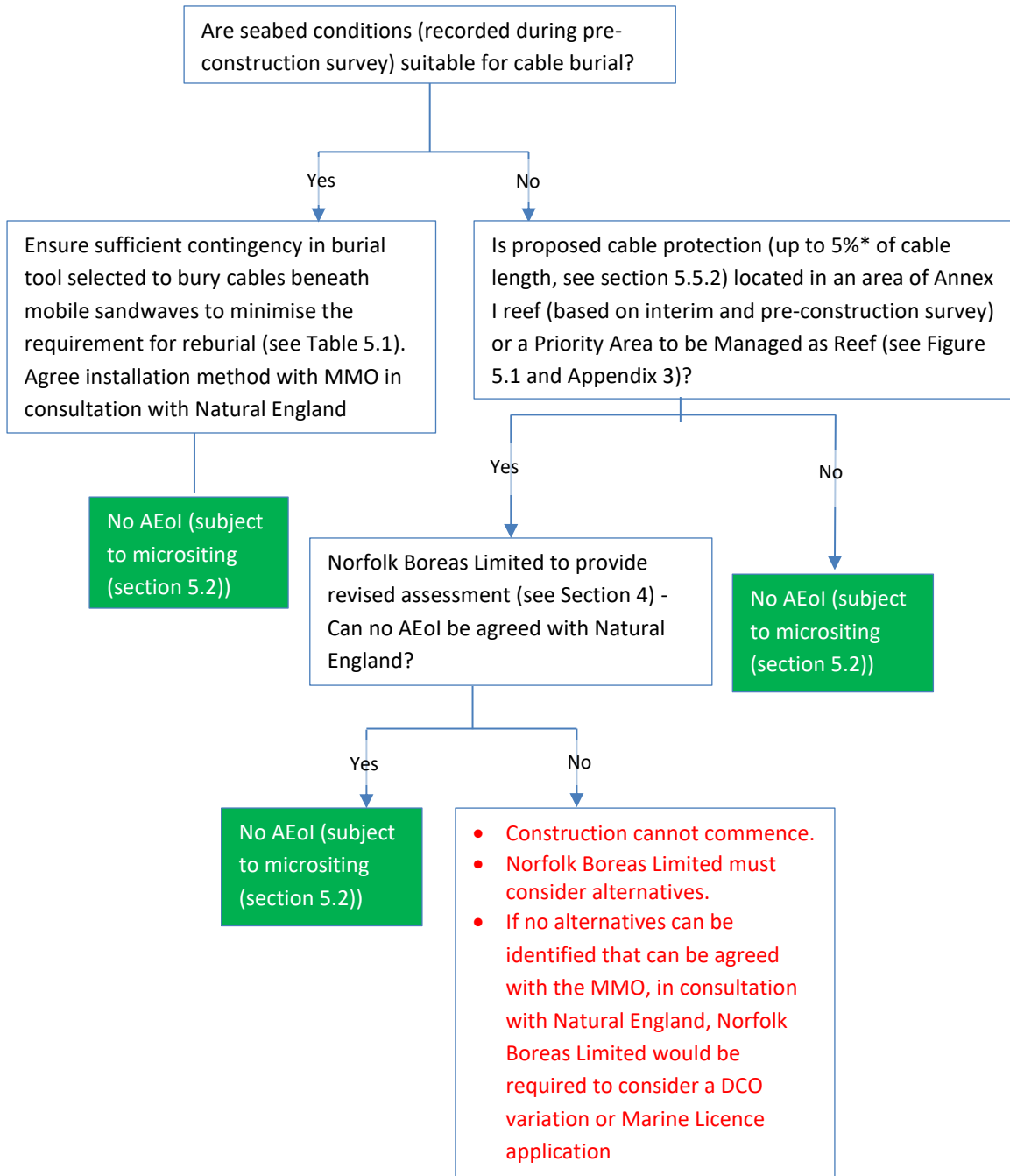
110. In order to ensure that material is deposited at the most appropriate locations to fulfil the criteria above Norfolk Boreas Limited will make the commitment that, should sandwave levelling be required and permitted, material will be disposed of using a fall pipe (also referred to as a down pipe) employed by the dredging vessel.

5.5 Cable protection

111. Norfolk Boreas Limited is committed to minimising cable protection and has already made significant reductions through embedded mitigation, in particular the commitment to use HVDC cables, requiring two cable pairs as opposed to six

individual cables and therefore reducing the total number of crossings and the potential length of cable which may be unburied (section 5.1.1).

112. Norfolk Boreas Limited is committed to using only essential cable protection (i.e. where required for cable/pipeline crossings (see section 5.5.1) and should burial not be possible for sections of the cable length (see section 5.5.2)), in order to minimise effects on the HHW SAC.
113. Section 5.4.14 of ES Chapter 5 provides a description of the types of cable protection that may be deployed at Norfolk Boreas, however, only essential cable protection up to the maximum values referred to in section 5.5.3 will be used. This will be determined based on the results of the pre-construction survey and any crossings agreements. Plate 5.3 outlines the decision process when identifying a requirement for cable protection. Prior to installation the need, type, sources, quantity (up to the maximum values presented below), distribution and installation method must be agreed with the MMO in consultation with Natural England. As shown in Plate 5.3, if it is not possible to reach a conclusion of no AEoI, construction cannot commence and the onus would be on Norfolk Boreas Limited to consider alternative solutions, in consultation with Natural England and the MMO. If a solution cannot be agreed, Norfolk Boreas Limited would need to consider a DCO variation or a Marine Licence application. For example, this could include: minor amendments to the redline boundary in discrete areas where the cable route interacted with reef to provide space for micrositing; or a variation to the Transmission DML Condition 9(1)(m) to allow a finding of AEoI should the project satisfy the HRA Assessment of Alternatives, Imperative Reasons of Overriding Public Interest (IROPI) and Compensatory Measures tests.



* It should be noted that a figure of 10% was used in the ES and Information to support HRA (document 5.3 of the Application) however this figure was reduced to 5% see section 3 for further detail

Plate 5.3 Cable protection decision process

5.5.1 Cable and Pipeline Crossings

114. A precautionary estimate of five existing cables and one pipeline within the HHW SAC which each Norfolk Boreas export cable would need to cross has been included in the calculation of the total area and volume of cable protection assessed in the ES and Information to Support HRA report (document 5.3). The estimated maximum width and length of cable protection for crossings would be 10m and 100m, respectively. The maximum height of crossings is 0.9m.

115. Every effort has been made by the Applicant to reduce the number of crossings by removing disused cables where agreement can be reached with the cable owners. Out of Service Cable Recovery Agreements have been finalised with BT Subsea who own a number of out of service cables within the HHW SAC. This has reduced the number of cable crossings from six to four per cable. This has reduced the maximum area occupied by cable protection associated with cable crossings from 12,000m² to 8,000m².
116. Following the interim and pre-construction survey and identification of preferred cable routes, Norfolk Boreas Limited would identify potential crossing requirements and consult with the owner/operators of the cable or pipeline.
117. Consultation would be undertaken with Natural England and the MMO at the earliest opportunity to allow both parties to provide advice on the proposed location, extent, type and quantity of cable protection associated with crossings.
118. Should additional unregistered cables/pipelines be identified during the pre-construction surveys, Natural England and the MMO will be consulted at the earliest opportunity. If an additional crossing can be accommodated using cable protection that is within the maximum values presented in section 5.5.3, no consent variation would be required. However, the proposed location, extent, type and quantity of cable protection associated with crossing the unregistered cable/pipeline would be agreed with the MMO in consultation with Natural England, should it not be possible to remove a section of the unregistered cable/pipeline.

5.5.2 Potential Unburied Cable Due to Ground Conditions

119. As discussed previously, Norfolk Boreas Limited is committed to burying cables where substrate conditions allow and therefore minimising cable protection. In addition, in response to requests from Natural England during the Norfolk Vanguard Examination, an Interim Cable Burial Study (Appendix 2 Interim Cable Burial Study) was commissioned (Norfolk Vanguard Limited, 2019) which identified that at least 95% of the offshore export cable length within the HHW SAC is likely to be able to be buried. As a result, Norfolk Boreas Limited have committed to 95% cable burial within the SAC and as such the length of potential cable protection required for unburied cable has been reduced to 5% of the Norfolk Boreas offshore export cable length within the HHW SAC. This is in addition to cable protection for cable/pipeline crossings (see sections 5.5.1 and 5.5.3). Only essential cable protection within the 5% will be used where burial is not possible due to encountering hard substrates (e.g. hard clay and sedimentary rocks) within the top 1-2m of the seabed.
120. As discussed in section 5.3, the circumstances within which cable burial would be deemed not possible and the approach (e.g. number of burial attempts) if these

circumstances are encountered would be agreed with the MMO in consultation with Natural England, prior to construction.

121. Prior to installation, the location, extent, type and quantity of any cable protection must be agreed with the MMO in consultation with Natural England.

5.5.3 Total area and Volume of Cable Protection in the SAC

122. The total area and volume of cable protection in the SAC for unburied cables and cable/pipeline crossings will not exceed 28,000m² and 17,200m³ based on the parameters described above.

5.5.4 Further mitigation in relation to cable protection

5.5.4.1 No cable protection in priority areas to be managed as reef

123. Due to further mitigation measures and information provided in Appendix 3, the location for such cable protection is not likely to overlap with areas to be managed as *S. spinulosa* reef. Therefore, Norfolk Boreas Limited has made a commitment to install no cable protection in the priority areas to be managed as reef within the HHW SAC (These areas are shown in darker purple in Figure 5.1, unless otherwise agreed with the MMO in consultation with Natural England. This commitment means that as the top priority areas to be managed as *S. spinulosa* reef are avoided, the cable protection cannot hinder the achievement of the conservation objective to restore (or subsequently maintain) the *S. spinulosa* Annex I reef to a favourable condition (Natural England & JNCC, 2018). Therefore, this ensures that any small scale permanent loss of habitat within the SAC would be inconsequential to the conservation objectives of Annex I reef.

5.5.4.2 Decommissioning of Cable Protection

124. Following a review of the supply chain, Norfolk Boreas Limited has made a further commitment to decommission cable protection at the end of the Norfolk Boreas project life where it is associated with unburied cables due to ground conditions (where required for crossings this will be left *in situ*). It will therefore be the Applicant's responsibility to demonstrate in the final SIP that the chosen form of cable protection can successfully be decommissioned. The evidence to demonstrate this will be presented to the MMO for approval in consultation with Natural England as early as possible, but at a minimum within the detailed SIP.
125. Further detail on the methods for decommissioning is provided in Appendix 3 of the Additional information for the HHW SAC position paper (document reference ExA.AS-2.D6.V1).
126. This commitment ensures that there will be no permanent habitat loss as a result of cable protection and further contributes to the ability to conclude no AEoI of the

HHW SAC. This is outlined further in Appendix 4 of the Additional information for the HHW SAC position paper (ExA.AS-2.D6.V1). Following further consultation with Natural England the commitment has been made within the DCO (Condition 3(1)(g) of the Transmission DMLs (Schedule 11 and 12 of the DCO) to not employ rock or gravel dumping within the HHW SAC. This is to ensure that the type of cable protection chosen is suitable for decommissioning.

5.5.5 Maintenance

127. During the life of the project, there should be no need for scheduled repair or replacement of the subsea cables. However periodic inspection would be required and if necessary, reactive repairs and reburial would be undertaken. This is considered further below.

5.5.6 Cable repairs

128. While it is not possible to determine the number and location of unscheduled repair works that may be required during the life of the project, a precautionary estimate of one export cable repair every 10 years on average within the SAC is included in the Information to Support HRA.
129. It will be critical that repairs can be instigated rapidly upon identifying a failure, therefore a protocol for undertaking repairs would be agreed with the MMO in consultation with Natural England, prior to construction.
130. Upon identifying a requirement to undertake a repair in the HHW SAC, the repair would be instigated in accordance with agreed protocol and the MMO and Natural England would be notified.
131. The protocol for any subsequent repairs would then be reviewed (if necessary) and agreed with the MMO and Natural England.
132. It is acknowledged that *S. spinulosa* reef can be expected to recover following cable installation and therefore has potential to be affected during maintenance if a repair is required at the location of a reef.
133. The repair protocol outlined above, would include consideration of circumstances where *S. spinulosa* reef may be present at the repair location. The protocol would be agreed with the MMO in consultation with Natural England in advance of construction.

5.5.7 Cable reburial

134. As discussed in section 5.3, the aim of the installation strategy for cables in the SAC would be to bury cables below the mobile sandwaves where substrate conditions

allow, to avoid or minimise the requirement for routine re-burial of cables during the operational phase.

135. The Information to Support HRA report (document reference 5.3) considers a worst case scenario that cables could become exposed due to moving sandwaves, if sandwave levelling/pre-sweeping were not adopted during the installation phase. During the life of the project, periodic surveys would be required to ensure the cables remain buried and if they do become exposed, re-burial works would be undertaken.
136. Reburial of up to 4km per cable within the SAC at approximately 5 year intervals has been estimated as a worst case scenario and assessed in the Information to Support HRA report based on a worst case scenario that no pre-sweeping is undertaken during cable installation. Should pre-sweeping be permitted the requirement for reburial would be greatly reduced, if not removed.
137. It will be critical that reburial can be instigated rapidly upon identifying exposed cable, therefore the protocol for undertaking reburial would be agreed with the MMO in consultation with Natural England, prior to construction.
138. Upon identifying a requirement to undertake reburial in the HHW SAC, the MMO and Natural England would be notified. The protocol for any subsequent reburial would then be discussed and agreed with the MMO and Natural England.
139. In order to limit the amount of cable protection located within the SAC as far as possible, Norfolk Boreas Limited have made the commitment to attempt to rebury any cables which become exposed within the SAC during operation prior to the installation of any cable protection. Furthermore, following discussion with the MMO and Natural England, Norfolk Boreas Limited have amended the dDCO and the Outline Operation and Maintenance Plan (document reference 8.11) to make it clear that “Placement of cable protection in new areas” during operation would be subject to a separate Marine Licence which would need to be applied for.
140. Should sandwave mobility be such that the cables have become unburied, it is unlikely that *S. spinulosa* reef would have formed in this location. However, as discussed above, reburial works would be agreed with the MMO in consultation with Natural England and this would include consideration of any *S. spinulosa* reef at the reburial location.

5.5.8 Cable protection during operation

141. If cable protection were to be required in new areas during the operation and maintenance phase of the project, this would be subject to an additional Marine Licence.

5.6 Overview of Mitigation Commitments in the HHW SAC

Table 5.2 Overview of Mitigation Commitments in the HHW SAC

Pre-consent Mitigation Commitments	Status	Final Mitigation solution following detailed design	Agreed with MMO in consultation with Natural England
Use of HVDC export cable solution to reduce the no. of cable trenches from six to two	Not subject to change	N/A	✓
Pre-construction survey to be undertaken within 12 months of commencing works	Survey methodology to be agreed with MMO in consultation with Natural England	To be confirmed	To be confirmed
Seabed preparation – potential use of pre-sweeping to minimise reburial	To be confirmed based on the pre-construction survey data, any relevant available evidence from other projects and agreed with the MMO in consultation with Natural England	To be confirmed	To be confirmed
Sediment disposal - up to 500,000m ³ of sediment arising from the SAC may be deposited within the SAC	The volume (up to this maximum) will be a factor of whether/or to what extent pre-sweeping is used (see above) and this will be agreed with the MMO in consultation with Natural England. The location and method for disposal will be agreed with the MMO in consultation with Natural England as shown below.	To be confirmed	To be confirmed
Sediment disposal – location(s) to be agreed with MMO in consultation with Natural England	To be confirmed based on the pre-construction survey data and detailed design and agreed with the MMO in consultation with Natural England.	To be confirmed	To be confirmed
Sediment disposal - method to be agreed with MMO in consultation with Natural England	To be confirmed based on the pre-construction survey data, any relevant available evidence from other projects and agreed with the MMO in consultation with Natural England	To be confirmed	To be confirmed
Cable installation – at least 95% of the cable length in the SAC will be buried to at least 1m. Any areas of unburied cable will be discussed with Natural England and the MMO (see also Cable Protection below)	To be confirmed based on the pre-construction survey data and detailed design and agreed with the MMO in consultation with Natural England	To be confirmed	To be confirmed
Cable installation – micrositing and cable route to be agreed with the MMO in consultation with Natural England	To be confirmed based on the pre-construction survey data and detailed design and agreed with the MMO in consultation with Natural England	To be confirmed	To be confirmed
Cable installation method to be agreed	To be confirmed based on the pre-construction survey data and	To be confirmed	To be confirmed

Pre-consent Mitigation Commitments	Status	Final Mitigation solution following detailed design	Agreed with MMO in consultation with Natural England
with the MMO in consultation with Natural England	detailed design and agreed with the MMO in consultation with Natural England		
Cable protection – up to 5%* of the cable length within the SAC may require cable protection	To be confirmed based on the pre-construction survey data and detailed design and agreed with the MMO in consultation with Natural England.	To be confirmed	To be confirmed
The total area and volume of cable protection in the SAC will not exceed 28,000m ² and 17,200m ³ , respectively	Only essential cable protection up to these maximum values will be used and prior to installation the location, extent, type and quantity must be agreed with the MMO in consultation with Natural England. This will be determined based on the results of the pre-construction survey and any crossings agreements.	To be confirmed	To be confirmed
Cable repairs – approximately one cable repair every 10 years within the SAC has been assessed but any repairs would be agreed with the MMO in consultation with Natural England	The methodology for undertaking repairs would be agreed with the MMO in consultation with Natural England, prior to construction. Upon identifying a requirement to undertake a repairs in the HHW SAC, the MMO and Natural England would be notified, and the methodology for undertaking repairs would be agreed. The approach for any subsequent repairs would then be discussed and agreed with the MMO and Natural England.	To be confirmed	To be confirmed
Cable reburial - approximately 10km per cable within the SAC at approximately 5 year intervals has been assessed but any reburial would be agreed with the MMO in consultation with Natural England	The methodology for undertaking reburial would be agreed with the MMO in consultation with Natural England, prior to construction to allow a rapid response during the maintenance phase if reburial is required. Upon identifying a requirement to undertake reburial in the HHW SAC, the MMO and Natural England would be notified. The approach for any subsequent reburial would then be discussed and agreed with the MMO and Natural England.	To be confirmed	To be confirmed
Additional Mitigation proposed during the Norfolk Boreas Examination			
A series of additional measures relating to the sediment disposal methodology	As a result of concerns raised by Natural England in their Relevant Representation (RR-099) Norfolk Boreas Limited has committed to: <ul style="list-style-type: none"> disposing of any dredged sediment close to the seabed using a fall pipe from the dredging vessel, disposing of sediment within a linear strip close to the cable route; and 	Confirmed	To be confirmed

Pre-consent Mitigation Commitments	Status	Final Mitigation solution following detailed design	Agreed with MMO in consultation with Natural England
	<ul style="list-style-type: none"> disposing of material updrift of the cable route to allow infill of any dredged areas as soon as possible following cable installation 		
Cable Reburial- If cable becomes exposed at any point during operation, reburial will be attempted before any cable protection is considered.	As a result of concerns raised by Natural England and the MMO in their Relevant Representations (RR-099 and RR-069). Norfolk Boreas limited have committed to attempting to rebury any exposed cable rather than adding cable protection. If after unsuccessful attempts to rebury the cable, cable protection is required this would only be installed following the attainment of a separate marine licence. As part of this licence the additional cable protection would be subject to agreement with the MMO in consultation with Natural England.	Confirmed	To be confirmed
Installation vessels – no jack up vessels will be used during construction within the HHW SAC.	Norfolk Boreas Limited have made this commitment in response to advice provided by Natural England in their Relevant Representation (RR-099). This commitment was made as a result of comments made in both Natural England's (RR-099) and The MMO's (RR-69) Relevant Representation.	Confirmed	To be confirmed
Interim <i>S.spinulosa</i> reef survey to commence in 2020	Survey methodology to be agreed with MMO in consultation with Natural England	To be confirmed	To be confirmed
Commitment not to install any cable protection in the priority areas to be managed as <i>S.spinulosa</i> reef (shown as dark Purple in Figure 4.1) identified by Natural England within the HHW SAC, unless otherwise agreed with the MMO in consultation with Natural England.	<p>This commitment was made at Deadline 5 during the Norfolk Boreas examination.</p> <p>The effectiveness of this proposed mitigation to mitigate effects on the HHW SAC designated features has been assessed in the Assessment of Additional Mitigation in the Haisborough, Hammond and Winterton Special Area of Conservation (Version 3) submitted at Deadline 10 of the Norfolk Boreas Examination (document reference ExA.AS-1.D10.V3) and the outcome of the original HRA (document 5.3) remains unchanged; no AEoI of the designated features of the HHW SAC.</p>	Confirmed	To be confirmed
Cable protection – commitment to decommission cable protection at the end of the project life where it is	This commitment was made at Deadline 6 during the Norfolk Boreas Examination. Further detail on the methods for decommissioning is provided in Appendix 2 of the Additional information for the HHW	Confirmed	To be confirmed

Pre-consent Mitigation Commitments	Status	Final Mitigation solution following detailed design	Agreed with MMO in consultation with Natural England
<p>associated with unburied cables due to ground conditions (where required for crossings this will be left <i>in situ</i>). To ensure that cable protection is suitable for decommissioning the commitment has been made to not employ rock or gravel dumping within the HHW SAC.</p>	<p>SAC position paper submitted at Deadline 6 of the Norfolk Boreas Examination (REP6-018 in the Norfolk Boreas Examination Library). The commitment to not employ rock or gravel dumping within the HHW SAC was made at Deadline 10 and is secured within the HHW SAC Control documents (document reference 8.20) and the draft DCO, submitted at Deadline 10.</p> <p>This commitment ensures that there will be no permanent habitat loss as a result of cable protection and further contributes to the ability to conclude no AEoI of the HHW SAC. This is discussed further in the Assessment of Additional Mitigation in the Haisborough, Hammond and Winterton Special Area of Conservation (Version 3) submitted at Deadline 10 of the Norfolk Boreas Examination (document reference ExA.AS-1.D10.V3).</p>		

6 MONITORING

142. Following the assessment of potential effects and identification of mitigation measures, consideration will be given to the requirement for monitoring within the HHW SAC.
143. The details of monitoring in the HHW SAC will be agreed with the MMO in consultation with Natural England prior to construction. Table 6.1 provides an overview of the likely monitoring within the HHW SAC.

Table 6.1 In Principle Monitoring within the HHW SAC

Potential Effect	Receptor/s	Phase	Headline reason/s for monitoring	Monitoring Proposal	Details
Changes in seabed topography, including scour processes	Sandbanks	Pre-construction	<ul style="list-style-type: none"> Engineering and design purposes Input in to benthic and other related ecological surveys and monitoring requirements as agreed with the MMO in consultation with SNCBs 	A single survey within the cable corridor survey areas using full sea floor coverage swath-bathymetric undertaken to IHO S44ed5 Order 1a standard and side-scan surveys of the area(s) within the Order limits in the SAC in which it is proposed to carry out construction works, including a 500m buffer area around the site of each works. (The "site of each works" being the area within the Order limits which is actually taken forwards to construction noting that it is possible that certain areas within the Order limits may not be developed).	Scope of surveys and programmes and methodologies for the purposes of monitoring shall be submitted to the MMO for written approval at least 4 months prior to the commencement of any survey works.
		Post-construction	<ul style="list-style-type: none"> Structural integrity / engineering (scour) Cable burial Monitoring of recovery at the location of works 	A single survey within the agreed cable corridor survey areas using full sea floor coverage swath-bathymetric surveys undertaken to IHO S44ed5 Order 1a standard and side scan sonar surveys around the footprint of the cable installation works to assess any changes in seabed topography. For this purpose the undertaker will, prior to the first such survey, submit a desk based assessment	
Effects on <i>S. spinulosa</i> reef	<i>S. spinulosa</i> reef	Interim period between application and consent	Determine the location and extent of any <i>S. spinulosa</i> reef within areas of the Order limits in the SAC in which it is proposed to carry out construction works to inform initial cable route selection.	<ul style="list-style-type: none"> A single geophysical (sidescan or Multi-Beam Echo Sounder) survey of those areas of the SAC within which it is proposed that seabed works will be carried out at a resolution sufficient to identify potential <i>S. spinulosa</i> reef; and In areas where potential <i>S. spinulosa</i> reef is identified from the review of the geophysical data, further survey e.g. drop down video will be deployed to confirm presence, extent and elevation. 	Survey methodologies shall be agreed with the MMO in consultation with Natural England.
		Pre-Construction (Norfolk Vanguard)*	Determine the location and extent of any <i>S. spinulosa</i> reef within areas of the Order limits in the SAC in which it is proposed to carry out construction works to inform the appropriate mitigation if found.	<ul style="list-style-type: none"> A single geophysical (sidescan or Multi-Beam Echo Sounder) survey of those areas of the SAC within which it is proposed that seabed works for Norfolk Vanguard will be carried out at a resolution sufficient to identify potential <i>S. spinulosa</i> reef; and In areas where potential <i>S. spinulosa</i> reef is identified from the review of the geophysical data, further survey e.g. drop down video will be deployed to confirm presence, extent and elevation. 	<ul style="list-style-type: none"> Survey programmes and methodologies for the purposes of monitoring shall be submitted to the MMO by Norfolk Vanguard Limited for written approval in accordance with the timeframes set out in the Norfolk Vanguard DMLs Surveys may occur up to 12 months prior to the proposed Norfolk Vanguard construction works
		Pre-construction (Norfolk Boreas)	Determine the location and extent of any <i>S. spinulosa</i> reef within areas of the Order limits in the SAC in which it is proposed to carry out construction works to inform the appropriate mitigation if found.	<ul style="list-style-type: none"> For each project, a single geophysical (sidescan or Multi-Beam Echo Sounder) survey of those areas of the SAC within which it is proposed that seabed works will be carried out at a resolution sufficient to identify potential <i>S. spinulosa</i> reef; and In areas where potential <i>S. spinulosa</i> reef is identified from the review of the geophysical data, further survey e.g. drop down video will be deployed to confirm presence, extent and elevation. 	<ul style="list-style-type: none"> Survey programmes and methodologies for the purposes of monitoring shall be submitted to the MMO in accordance with the timeframes set out in the DMLs Surveys may occur up to 12 months prior to the proposed construction works for both projects.
		Post-construction	The requirement for post-construction monitoring will be dependent on the findings of the pre-construction surveys.	<ul style="list-style-type: none"> Where no <i>S. spinulosa</i> reef is identified by the pre-construction geophysical survey of the proposed works (and associated buffers), no further post-construction surveys will be undertaken; Where <i>S. spinulosa</i> reef is identified during the pre-construction survey and cannot be entirely avoided through micrositing, a single post-construction survey, specifically targeting those reefs identified in the baseline survey will be undertaken as a check on their condition using the same methodology set out for pre-construction monitoring. 	<ul style="list-style-type: none"> If required, survey programmes and methodologies for the purposes of monitoring shall be submitted to the MMO for written approval in accordance with the timeframes set out in the DMLs. The duration over which monitoring of recovery is required would be agreed with the MMO following review of the post-construction survey data.

* This survey would only proceed should Norfolk Vanguard progress to its pre-construction phase

7 SUMMARY

144. The offshore cable corridor for Norfolk Boreas and Norfolk Vanguard have been identified using a combined strategic approach in order to minimise impacts. Therefore, it is appropriate that both projects aim to provide confidence that a conclusion of no AEoI can be made.
145. The final Norfolk Boreas SIP will be used to assess any effects on the Annex I Sandbank and Reef features of the HHW SAC based on the pre-construction surveys and detailed design of the project. This process will also identify any mitigation and monitoring requirements to ensure the MMO is satisfied, in consultation with Natural England, that there is 'no adverse effect beyond reasonable scientific doubt' on the HHW SAC.
146. The following engineering work streams and offshore surveys have been identified to inform the development of the final SIP:
- Review of available information from other offshore wind and cabling projects (including extensive review of experience from the Norfolk Vanguard Project);
 - Pre-construction survey(s);
 - Geophysical survey within the offshore cable corridor in the HHW SAC;
 - Targeted *S.spinulosa* reef surveys within the offshore cable corridor in the HHW SAC (through the interim and pre-construction surveys);
 - Geotechnical assessment of the seabed within the offshore cable corridor in the HHW SAC;
 - A Cable Burial Risk Assessment;
 - A Burial tool capability study;
 - A Sandwave characterisation study;
 - Cable installation strategy.
147. These will be developed and undertaken in consultation with the MMO and Natural England. The results of these studies will inform the review of effects on the integrity of the SAC (section 4) and the identification of mitigation measures (section 5) in the final HHW SAC SIP.

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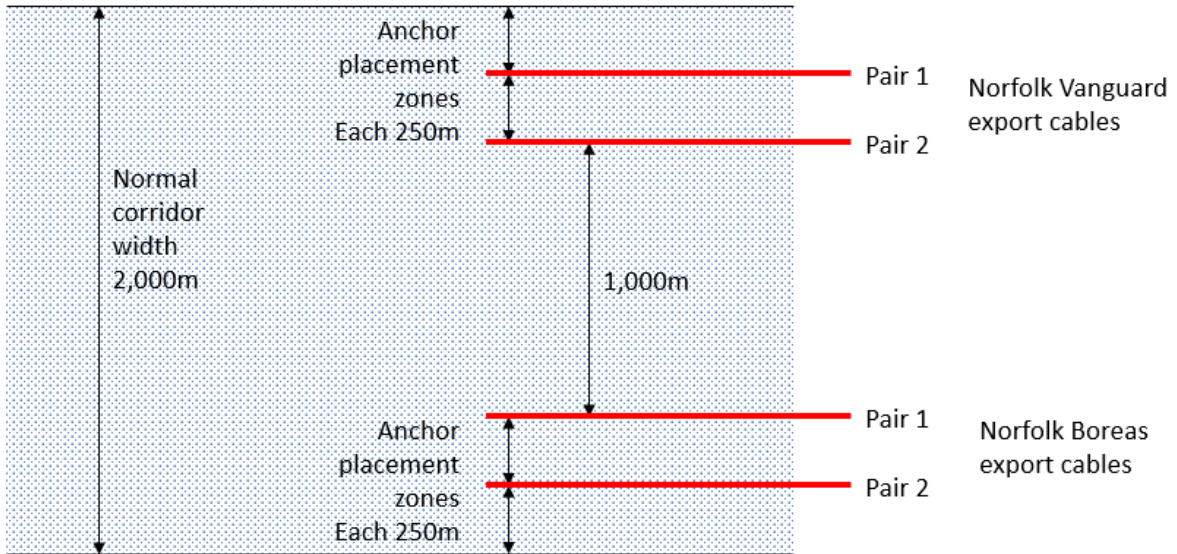
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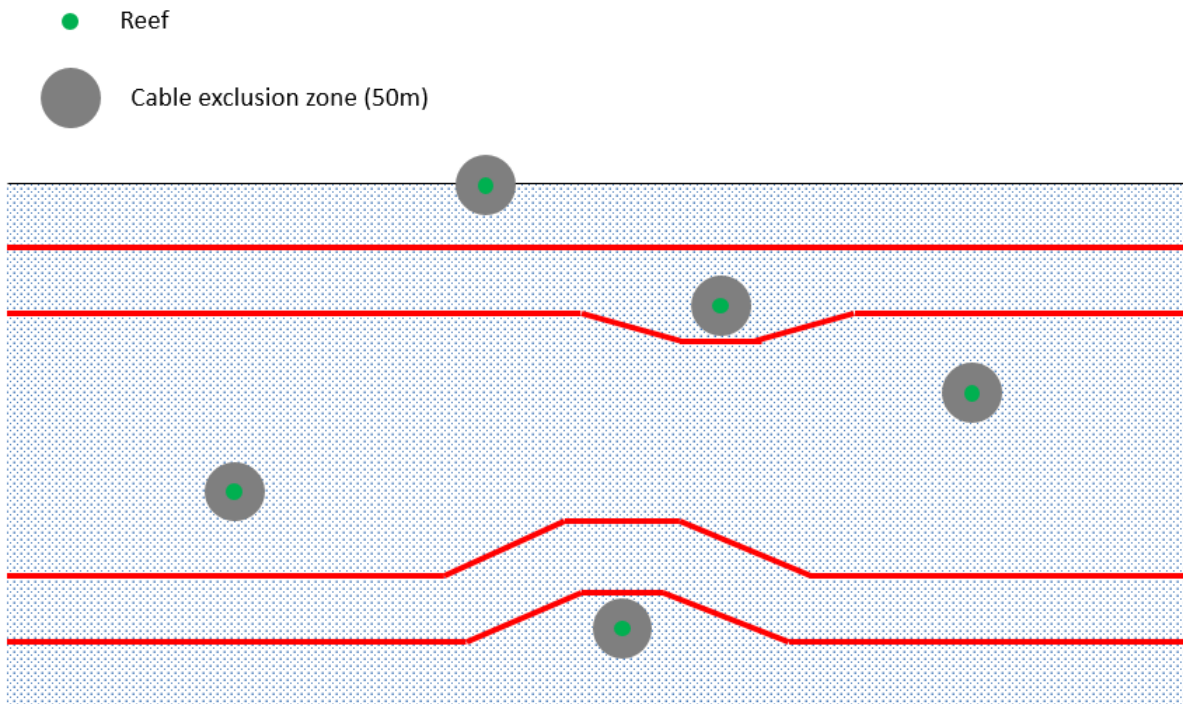
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APPENDIX 1 INDICATIVE MICROSITING OPTIONS

'Normal' placement of cables within the corridor, no constraints

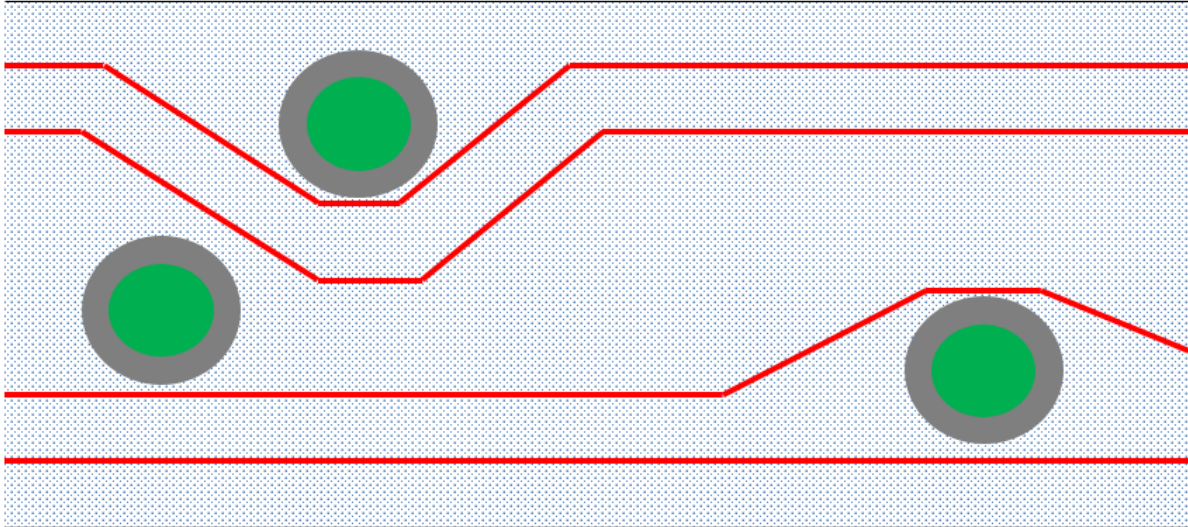


Placement of cables with small areas of reef



Placement of cables with larger areas of reef

- Reef
- Cable exclusion zone (50m)



APPENDIX 2 INTERIM CABLE BURIAL STUDY

NORFOLK VANGUARD & NORFOLK BOREAS

PRELIMINARY MPA BURIAL STUDY

2210_NVOWF_Preliminary_Burial_Study_004_190501

REVISION	DATE	ISSUE DETAILS	PREPARED	CHECKED	APPROVED
001	15/03/2019	Draft issue	MW	SW	MW
002	29/03/2019	Draft Final Issue	MW	SW	MW
003	03/04/2019	Final Issue	MW	AR	MW
004	01/05/2019	Updated Final Issue	RD	MW	MW

REVISION	SECTION	PAGES	BRIEF DESCRIPTION OF CHANGES	AUTHORS OF CHANGE
002	2.3.1	9	Details of survey equipment expanded	MW
	2.4	14	Clarified lack of impact of water depths	
	2.5	14	Changed “rock outcrops” to “boulders”	
	2.5	15	Changed “safety clearances” to “separation clearances”	
	2.6	16	Inserted reference to flow volumes	
	2.6.1.1	18	Removed incorrect references to lack of 2m swords for Atlas	
003	-	-	No changes	N/A
004	All	All	Edits for clarification	RD

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ABBREVIATIONS

BMH	Beach Manhole
BSB	Below Seabed
DTS	Desk Top Study
GPS	Global Positioning System
HHW SAC	Haisborough, Hammond & Winterton SAC
LP	Landing Point
OWF	Offshore Wind Farm
RPL	Route Position List
SAC	Special Area of Conservation

1.0 INTRODUCTION

Vattenfall Wind Power are developing the Norfolk Vanguard and Norfolk Boreas offshore windfarms (OWFs). The Norfolk Vanguard development area is located more than 47km from the Norfolk Coast in the North Sea and will meet the electricity demand of around 1.3 million UK households. Norfolk Vanguard has a sister project of the same size called Norfolk Boreas, this project trails one year behind Vanguard in its development.

Both these windfarms will require export cables to carry the power generated back to shore. The export cable corridor runs generally west from the Norfolk Vanguard East, Norfolk Vanguard West and Norfolk Boreas turbine arrays to the landfall near Happisburgh. The export corridor is common for all the windfarm turbine array areas until they diverge to service each array at the eastern end of the corridor. The export cable corridor crosses the Haisborough, Hammond and Winterton Special Area of Conservation (HHW SAC) which has been primarily designated to protect biogenic reefs and sandbanks.

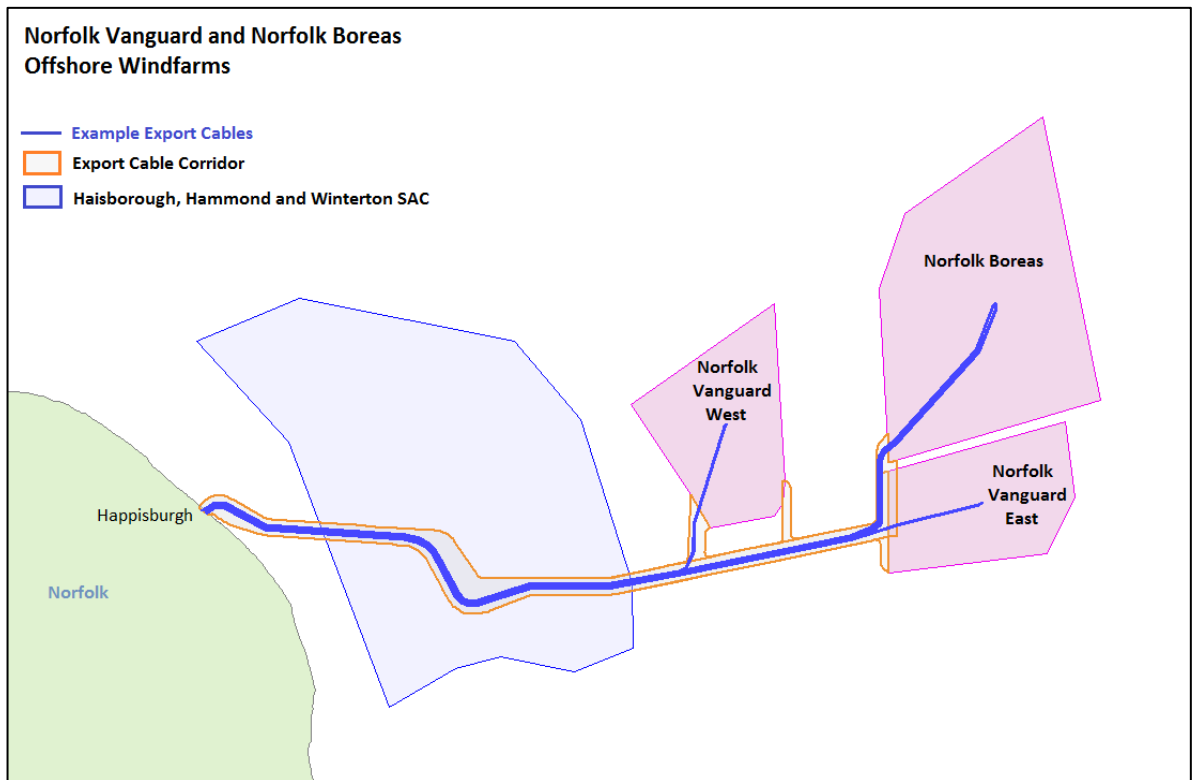


Figure 1: Norfolk Vanguard and Norfolk Boreas Site Overview

Target burial for the export cables is 1.5m below seabed (BSB). Where the burial achieved is <1m additional surface protection such as rock dump or mattresses may be needed. Within the HHW SAC this additional protection may introduce an additional permitting burden to the project. This study aims to analyse the expected burial along the export cable routes within the SAC and highlight areas where additional protection may be needed.

2.0 SITE DESCRIPTION

2.1 Haisborough, Hammond & Winterton SAC

The Haisborough, Hammond & Winterton SAC is designated for two key protected features:

- Reefs
- Sandbanks which are slightly covered by seawater all the time

The reefs are the product of *Sabellaria spinulosa* tube-building ross worms. These tubes are made up of coarse sand and shell fragments cemented together with mucus and can rise between 5-10cm above the surrounding seafloor in the SAC [1]. They can serve as a stable substrate for the development of diverse epifaunal communities and occur in the troughs between sandbanks.

The large sandbanks in the SAC are generally parallel to the coastline with crests that lie just below the sea surface (Figure 2). They are geologically recent; the oldest banks are Hewitt Ridge and Smiths Knoll at around 7,000 years old and the newest are Newarp Banks and North and Middle Cross Sands which date to around 1,500 years ago. Bank age generally increases with distance from shore. The crests of the banks are low-diversity and mainly host amphipods and cat worms that rapidly burrow into the shifting sediment. More diverse assemblages occur in the flanks and troughs of the banks which are more stable and also tend to have a higher gravel fraction in the seabed sediment.

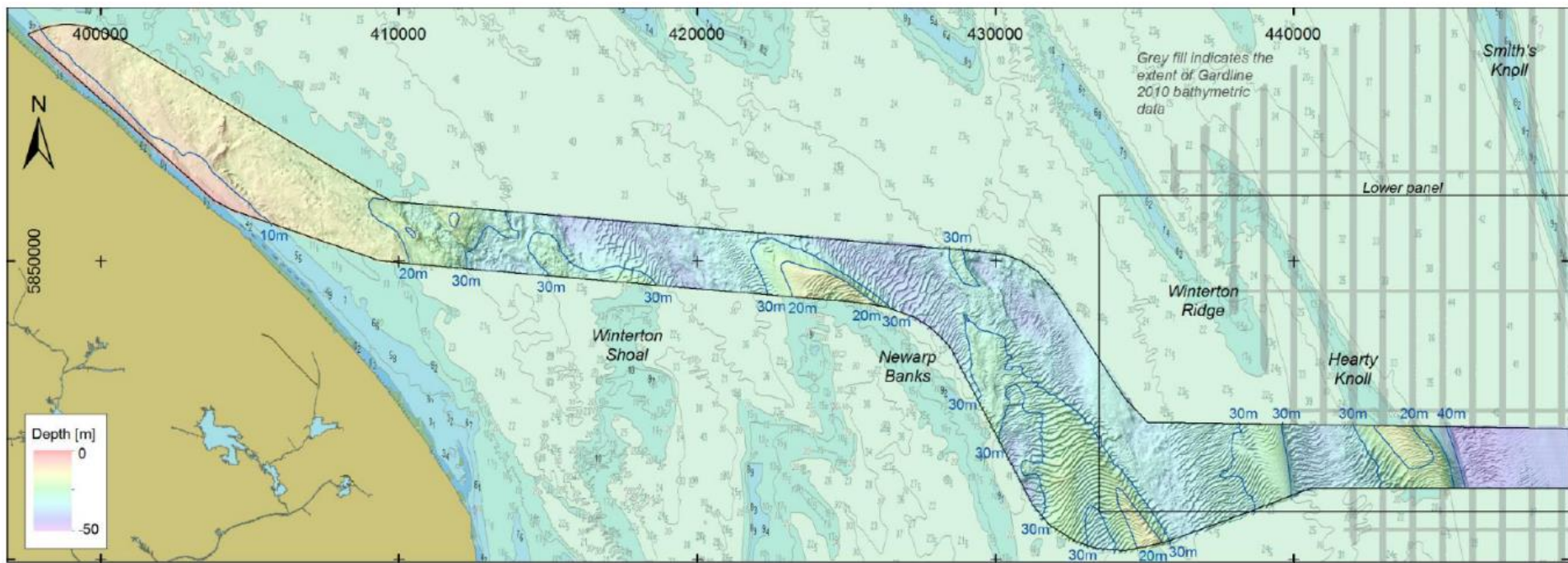


Figure 2: Sandbanks in the project area [2]

2.2 HVDC Export Cable Routes

Vattenfall have decided to use HVDC cables for the export links for Norfolk Vanguard and Norfolk Boreas. The routes used as the basis for this report are therefore the HVDC export routes previously developed by Global Marine Group [3]. Within the HHW SAC there are four distinct cable routes (ie. two per project), each with a planned length around 41.2km. Total cable length within the SAC is 164.866km.

2.3 Data Analysis

2.3.1 Data Sources

The results of two marine surveys have been supplied by Vattenfall, which cover the windfarms and export cable route:

- › A geophysical, geotechnical and environmental survey carried out by Fugro Survey B.V. in 2016 with 100% coverage of the export cable routes outside of the OWF areas. This has total coverage of the area within the HHW SAC using single and multibeam echosounders, sub-bottom profiler, magnetometer, sidescan sonar and ultra-high resolution sonar sensors. Co-located cores and cone penetration tests (CPTs) were taken at points along the route, of which seven are within the HHW SAC. The environmental survey was conducted with video and grab samples to classify the biotopes along the area of interest.
- › A geophysical survey undertaken by Gardline in 2010 with around 30% coverage of the OWF areas and beyond. This has only a minor overlap with the export cable route within the HHW SAC.

2.4 Seabed within the SAC

Of the survey swath captured by Fugro in 2016, 115.5km² lies within the HHW SAC. The breakdown of surficial sediments can be seen below:

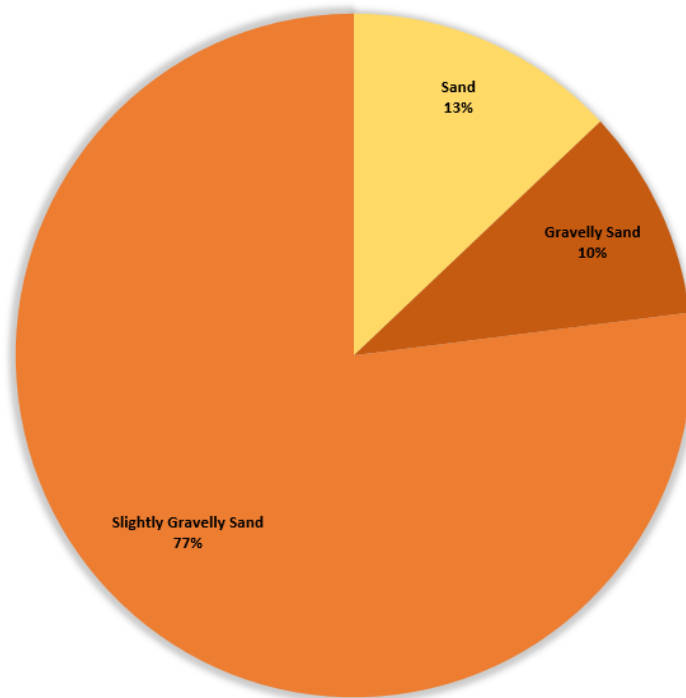


Figure 3: Surface Sediment Breakdown

The surface sediments are dominated by sand with a non-existent to minor gravel fraction. The Fugro survey results show the most common sediment type is slightly gravelly sand, with gravel fraction from 1-5%. Compared to the surveyed area as a whole, the HVDC export cable routes cross a slightly higher proportion of Sand and a lower proportion of Gravelly Sand (Figure 4). This will tend to improve the amount of burial that can be achieved.

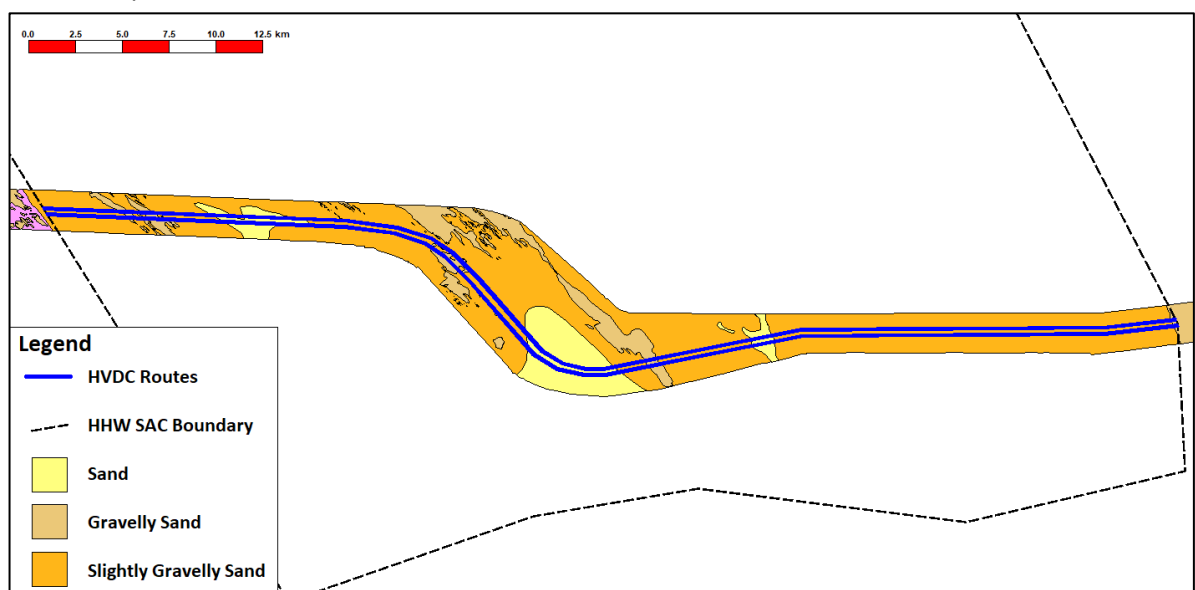


Figure 4: HHW SAC Surface Sediment

As part of the geotechnical scope of the 2016 survey, Fugro performed sixteen CPTs and vibrocores within the SAC boundaries. The findings are summarised in Table 1 below, in numerical order from east to west. Sample locations are featured on the charts in Appendix 3.2.

CPT/ VIBROCORE	MAPPED SEDIMENT	RESULTS
118	Slightly Gravelly Sand	0.00 – 0.27m: extremely low strength olive grey sandy CLAY with traces of coarse sand-sized to medium gravel-sized shells and shell fragments and traces of organic matter
		0.27 – 6.82m: very loose to loose olive grey silty fine SAND, with extremely closely spaced widely spaced thin laminae to medium beds of grey clay and with traces of coarse sand-sized to fine gravel-sized shell fragments
		<i>from 0.65m:</i> with medium gravel-sized pockets of very dark grey clay, with traces of medium gravel-sized pockets of black staining (possibly organic) and with traces of coarse sand-sized shell fragments <i>from 1.05m to 1.25m:</i> with extremely closely spaced thin laminae of black staining (possibly organic)
119	Slightly Gravelly Sand	0.00 – 0.14m: extremely low strength black sandy CLAY, with traces of fine gravel-sized shell fragments
		0.14 – 3.82m: medium dense dark grey slightly gravelly very silty fine to medium SAND, with closely spaced thin to medium beds of black sandy clay, with traces of coarse sand-sized to fine gravel-sized shell fragments and with traces of fine gravel-sized to medium gravel-sized pockets of dark grey clay. Gravel is subangular to subrounded fine to medium of various lithologies
		3.82 – 6.72m: low strength to very high strength dark grey sandy CLAY, with extremely closely to widely spaced thin laminae to medium beds of slightly clayey fine sand
120	Slightly Gravelly Sand	0.00 – 0.40m: very loose to loose light olive brown medium SAND, with traces of coarse sand-sized to medium gravel-sized shells and shell fragments
		0.40 – 5.09m: dense to very dense light olive brown slightly silty fine to coarse SAND, with traces of coarse sand-sized to medium gravel-sized shells and shell fragments
		<i>at 1.55m:</i> with a very thin bed of black organic clay
		<i>from 2.53m to 2.73m:</i> with a medium bed of clay
		<i>from 2.65m:</i> with very closely spaced to widely spaced thin laminae to thin beds and coarse gravel-sized pockets of black silty material (possibly organic)
5.09 – 6.69m: medium strength dark grey slightly sandy CLAY		
<i>at 5.92m:</i> with a medium bed of sand		

121	Slightly Gravelly Sand	<p>0.00 – 5.75m: very loose becoming dense to very dense light olive brown slightly silty fine to medium SAND, with traces of coarse sand-sized shell fragments</p> <p><i>from 0.55m:</i> with traces of fine to coarse gravel-sized pockets of black staining (possibly organic)</p> <p><i>from 3.65:</i> slightly gravelly. Gravel is angular to subrounded fine to coarse of various lithologies from 5.45 m - with very closely spaced thick laminae to very thin beds of coarse sand and few coarse sand-sized to medium gravel-sized shell fragments at 5.70 m - end of VC121</p> <p>5.75 – 6.70m: high strength to very high strength CLAY, with medium spaced thin beds of medium dense sand</p>
122	Slightly Gravelly Sand	<p>0.00 – 4.09m: dense to very dense light olive brown slightly silty slightly gravelly medium SAND, with traces of coarse sand-sized to medium gravel-sized shell fragments. Gravel is subangular to subrounded fine to medium of various lithologies</p> <p><i>from 0.90m to 2.40m:</i> with traces of fine to medium subrounded to subangular gravel of mixed lithologies</p> <p>4.09 – 6.56m: low strength to extremely high strength dark grey gravelly sandy CLAY, with very closely spaced and medium to coarse gravel-sized pockets of dark grey sand</p>
123	Slightly Gravelly Sand	<p>0.00 – 6.70m: very dense light olive brown slightly silty fine to medium SAND, with traces of coarse sand-sized to medium gravel-sized shell fragments</p>
124 124A	Gravelly Sand	<p>0.00 – 0.34m: loose to medium dense olive grey slightly silty fine to medium SAND, with traces of coarse sand-sized to fine gravel-sized shell fragments</p> <p>0.34 – 6.63m: very dense greenish grey silty fine to medium SAND, with coarse sand-sized to medium gravel-sized shells and shell fragments. Gravel is subrounded fine to coarse of various lithologies</p> <p><i>from 0.34m to 2.20m:</i> slightly gravelly silty. Gravel is subrounded fine to coarse of various lithologies</p> <p><i>at 0.45m:</i> with siliceous concretions with iron oxide coating</p> <p><i>at 0.60m:</i> with a thick laminae of dark brown staining</p> <p><i>at 3.25m:</i> with a rounded coarse gravel</p> <p><i>at 5.05m:</i> with an angular coarse gravel</p>

Table 1: Geotechnical Samples

The seabed within the SAC is not flat or static. The 2016 Fugro survey identified scattered *Sabellaria* reef areas which are thought to coincide with the areas of Gravelly Sand. As well as the sandbanks for which it was designated, which can rise over 25m above the surrounding seabed, there are also smaller bedforms across large areas (Figure 5). These can clearly be seen in a depth profile along the centre of the HVDC routes through the SAC (Figure 6). Sandwave heights vary but typical peak-to-trough values in this area are in the range 2-7m. For this reason, a reference seabed level (RSBL) has been established in previous GMG reports [3]. This is taken as the level below which sediment migration is negligible and therefore the cables will remain at their target burial

depth despite the migration of sandwaves. The key geotechnical parameters are therefore those within 1.5m depth of the RSBL, not the actual seabed level at the time of the survey.

Table 2 summarises the geotechnical parameters along the cable routes within the HHW SAC, based on the 2016 Fugro survey results. Where clays are present within the target burial depth shear strengths are generally 50kPa or less. Maximum relative densities of sands to this depth vary from 10% at sample 118 to over 120% at 124. There is a trend of increasing relative density as the export cable routes approach shore as well as with depth into the seabed, which is most relevant for sections in which pre-sweeping operations will be carried out to lower the height of the sandwaves.

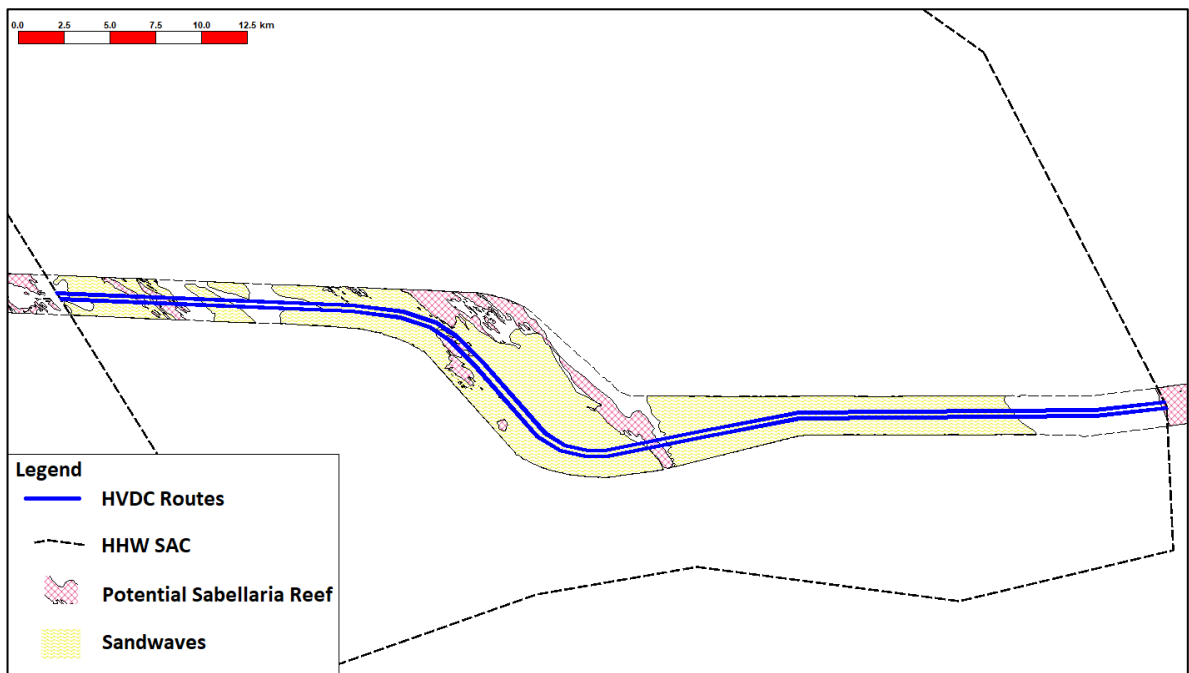


Figure 5: Natural Seabed Features in HHW SAC

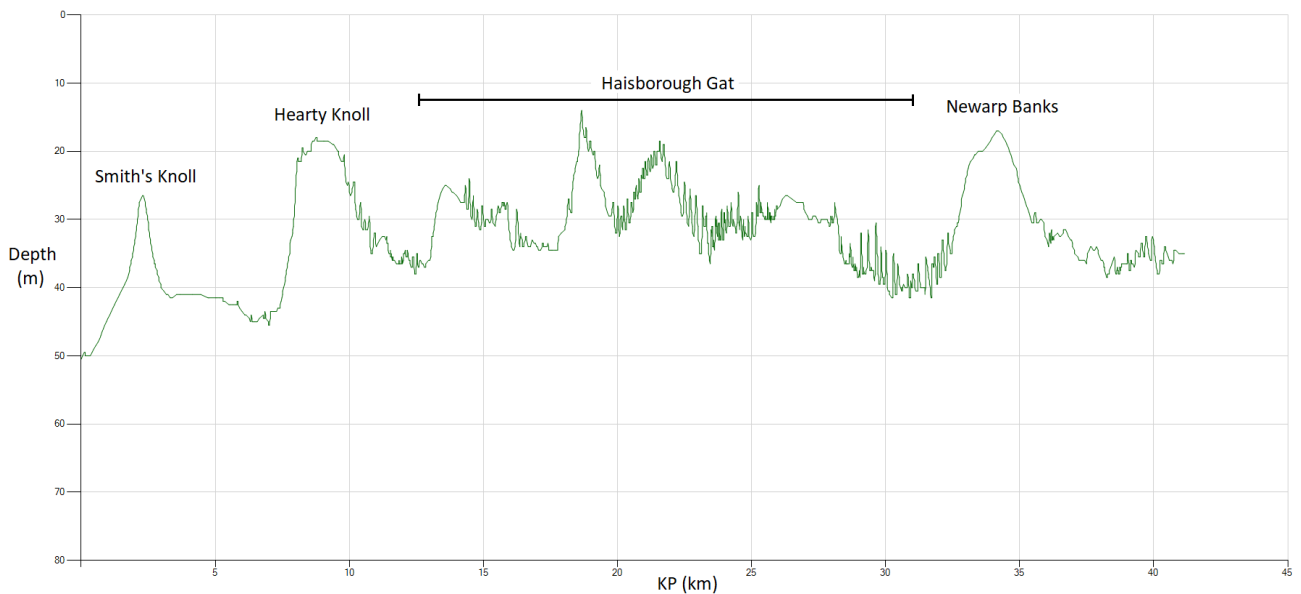


Figure 6: Depth Profile within HHW SAC

CPT/ VIBROCORE	HEIGHT ABOVE RSBL	MAX. CLAY SHEAR STRENGTH WITHIN BURIAL DEPTH	MAX. SAND RELATIVE DENSITY WITHIN BURIAL DEPTH
118	0	10kPa	10%
119	0	50kPa	55%
120	0	N/A	90%
121	0	N/A	90%
122	2-2.5	N/A	105%
123	0	N/A	105%
124, 124A	0.5-1	N/A	>120%

Table 2: Relevant Geotechnical Parameters

Water depths within the SAC vary from 12.5-51m. This means that the site is not particularly draft limited and is accessible by many potential installation vessels able to support a range of burial tool options.

2.5 Micro-routeing Potential

As described in the 2017 GMG Installation Study, micro-routeing of the cables is a potential solution to avoid areas where burial may be reduced below target, such as areas with boulders or other debris. There are a total of 352 sidescan sonar contacts of various types identified by the 2016 survey within the HHW SAC. The nature of these contacts is detailed in Table 3.

TYPE	NUMBER
Boulder	1
Debris or Suspected Debris	145
Possible <i>Spinulosa</i> Patch	191
High Backscatter Area	1
Wreck	14

Table 3: Sonar Contacts

The majority of these objects are sufficiently scattered that the cable routes are expected to be able to avoid them, depending on the separation clearances chosen.

Although Sabellaria reef does not represent a significant physical obstacle to cable burial, it is understood that avoiding areas of reef will be a key objective for detailed design of the final cable routes within the SAC. The extent of these areas is not known at this stage; the Fugro survey data indicates areas of 'potential reef' (Figure 5), but this mapping is not definitive. Moreover, the distribution of Sabellaria reef changes over time in response to the movement of sandbanks and other factors. To address this situation, it would be advisable to carry out an additional survey (or surveys) closer to the time of cable installation, to inform the final micro-routeing of the cables.

Should the total avoidance of reef be impossible, the affected areas of reef are expected to reinstate themselves after the initial disturbance [3]. This is evidenced by the HHW SAC Selection

Assessment document which notes that no reef disturbance is seen over buried cables in the area and that the sandbanks themselves move and displace the reefs on a continual basis [4].

2.6 Burial Tools Assessed

Many different cable burial tools are available on the market that could potentially be used for the Norfolk Vanguard project. Most fall into one or more of three major categories; jetting, ploughing or cutting.

In jet burial, water jets at high pressure are used to fluidise the seabed or excavate a clear trench into which the cable sinks. All jetting solutions considered by this report are the fluidising kind. The burial capability depends on the number, configuration and type of jetting nozzles and the water pressure and flow volumes that can be achieved. Jet trenchers are particularly effective in non-cohesive sediments such as sands, in which the water jets penetrate between the grains and force them apart.

A cable plough operates by using a share pulled through the seabed by the installation vessel. This lifts a typically V-shaped wedge of sediment. The cable is fed through the plough and laid at the bottom of the trench and the sediment wedge falls back, covering the cable. Ploughs are suitable for a wide range of seabeds but excel in cohesive sediments such as clays.

Chain cutters function using a toothed chain that rotates, cutting into the seabed. The cable is then laid into the excavated trench. Chain cutters are most used in strong cohesive seabeds such as those made of rock or consolidated clays. They are less useful in non-cohesive soils such as sand, which tend to immediately backfill behind the cutter and can jam or rapidly blunt the teeth. Cutters may be assisted with jets in a hybrid mode to improve their performance in this scenario.

NAME	MODE OF OPERATION	SUITABILITY
SMD Atlas ROV	Jetting	N
SMD Q1000 ROV (Jetting)	Jetting	Y
SMD Q1400 ROV (Jetting)	Jetting	Y
SMD Q1400 ROV (Cutting)	Chain Cutter	N
Power Cable Plough	Jetting & Plough Share	Y
Pre-Lay Plough	Plough Share	N

Table 4: Burial Tools

2.6.1 Expected Burial Performance

2.6.1.1 SMD Atlas ROV



Figure 7: Atlas ROV

CHARACTERISTIC	1.5m SWORDS
Sword Depth	1.5m
Sword Width	0.1m
Trench Width	0.44m
Nozzle Spacing	0.25m
Number of Downward Facing Nozzles	14 (2 x 7)
Downward Jet Pressure	4.0 bar
Downward Jet Diameter	17.47mm
Number of Rearward Facing Nozzles	6 (2 x 3)
Rearward Jet Pressure	4.0 bar
Rearward Jet Diameter	17.47mm

Table 5: Atlas ROV

The performance of the Atlas trencher has been analysed assuming the use of 1.5m jetting swords. The use of 2m swords is unlikely to change the results which are largely dictated by the jet pressure and flow volumes achievable.

Several passes would likely be required of each cable, with progress rates of 100-200m per hour for sand relative densities up to 100%. Clay strengths of 50kPa would result in slow progress in the region of 100m per hour. Closer to shore where sand densities can exceed 100% progress rates are likely to be extremely low and the target burial may not be achieved even after several passes. The Atlas ROV is therefore not judged to be a suitable tool for the installation of the export cables.

2.6.1.2 SMD Q1000 ROV (Jetting)



Figure 8: Q1000 ROV

CHARACTERISTIC	2.0m SWORDS
Sword Depth	2.0m
Sword Width	0.1m
Trench Width	0.44m
Nozzle Spacing	0.13m
Number of Downward/Inward Facing Nozzles	40 (2 x 20)
Downward/Inward Jet Pressure	14.7 bar
Downward/Inward Jet Diameter	12.00mm
Number of Rearward Facing Nozzles	6 (2 x 3)
Rearward Jet Pressure	14.7 bar
Rearward Jet Diameter	50.00mm

Table 6: Q1000 ROV

The Q1000 ROV can be equipped with 1m, 2m or 3m swords. The 2m swords are expected to be most suitable to achieve the 1.5m burial depth of the Norfolk Vanguard export cables. The progress rate in 50kPa clays for the Q1000 trencher with 2m jetting swords is expected to be around 100m per hour. Progress rates in 90% sand are expected to average around 280m per hour. For over-consolidated sands in the 100-120% relative density range progress rates are unknown but may be around 100m per hour.

Data on the success of burial to 1.5m by the Q1000 ROV is limited. To remedy this an analysis was carried out of a project carrying out remedial burial on power cables to a target trench depth of 2m in the eastern North Sea. In this case around 10% of the cable was not buried to target, with up to 4% being to <1m. This project was carried out at relatively high burial speeds (300m per hour) and was impeded by debris. None of the areas in which trenching was attempted achieved burial of <1m, although some required a second burial pass. The seabed type is similar but quantified soil strengths are unknown. Therefore 5% has been adopted as a reasonable conservative estimate of the length of the Norfolk Vanguard export cables that could require remedial protection in the HHW SAC.

2.6.1.3 SMD Q1400 ROV (Jetting)



Figure 9: Q1400 ROV

CHARACTERISTIC	2.0m SWORDS
Sword Depth	2.0m
Sword Width	115mm
Trench Width	0.6-1.1m (Product diameter 0.4-0.9m)
Nozzle Spacing	100mm
Number of Downward/Inward Facing Nozzles	X20 Downward + x20 Inward
Downward/Inward Jet Pressure	10 to 15 bar
Downward/Inward Jet Diameter	12-17mm dependant on soils
Number of Rearward Facing Nozzles	1 at each base of the sword
Rearward Jet Pressure (Eductor)	10 - 15 bar
Rearward Jet Diameter	40mm backwash nozzle

Table 7: Q1400 ROV

The Q1400 ROV can be equipped with 2m or 3m swords. Similar to the Q1000 ROV, the 2m swords are expected to be most suitable to achieve the 1.5m burial depth of the Norfolk Vanguard export cables.

In dense sands the Q1400 is expected to easily bury to 1.5m at a rate of 250m/hr. Assuming a 400mm separation between jetting swords, the progress rate in 50kPa clays for the Q1400 trencher is expected to be around 200m per hour. Full burial is expected to be achieved except where very local effects (e.g. a subsurface boulder under the cable) prevent cable burial.

2.6.1.4 SMD Q1400 ROV (Cutting)

Due to the lack of strong cohesive sediments (clays) reported inside the HHW SAC survey corridor the Q1400 chain cutter is not anticipated to be a suitable burial tool. If stiffer clays are found during a later survey the chain cutter with associated jets may be considered.

2.6.1.5 Power Cable Plough

There are several large power cable ploughs available that would be suitable for the installation of the Norfolk Vanguard export cables. Two of these, the SMD HD3 plough and IHC Sea Stallion are summarised below.



Figure 10: IHC Sea Stallion Plough

CHARACTERISTIC	HD3	SEA STALLION
Maximum Trench Depth	3m	3.3m
Maximum Tow Force	150Te	150Te
Cable Outer Diameter	30-300mm	30-300mm
Cable MBR	5m	5m
Steering	±12°	±10°
Width	6.5m	6.0m
Jet Pressure	6 bar	10 bar

Table 8: Power Cable Ploughs

The cable plough would need to be deployed with a jetting pack to become a viable option in the dense sands of the HHW SAC. The water jets fluidise the sand immediately ahead of the plough share, significantly easing the progress of the share through the seabed as it no longer relies solely on mechanical cutting. The burial achieved is heavily reliant on ploughing speeds as above a certain

speed there may not be enough time for the jet action to take effect before the plough share encounters that portion of the seabed.

The clays found within the target trench depth inside the HHW SAC are not expected to be an obstacle to a power cable plough, which are estimated to be capable of penetrating soils with strengths up to 350kPa. The consolidated sands are expected to slow burial. Progress rates depend on the vessel and winch capability but a vessel capable of exerting a tow force of 100 tonnes or more could expect to achieve speeds of just over 90m per hour.

2.6.1.6 Osbit Scion 240 Pre-Lay Plough

GMG's pre-lay plough is designed to clear boulders and cut a trench up to 1.7m into the seabed, into which the cable is laid. The trench can then be backfilled to the required depth. Although effective, this process is optimised for performance in stiff clays. In the mobile sand seabed of the HHW SAC there is a risk that the trench would simply backfill before the cable came to be laid. The resulting backfill would however be less dense than the currently existing seabed at depth and so could allow an ROV such as the Atlas or Q1400 to more easily achieve the target cable burial across the site. For the Q1400 or Q1000 this is likely to be unnecessary whereas for the Atlas this procedure would likely be essential to achieve the burial depth.

Progress in the dense sands closer to shore within the SAC is likely to be very slow. This burial solution is not expected to be economic compared to the others explored in this report.

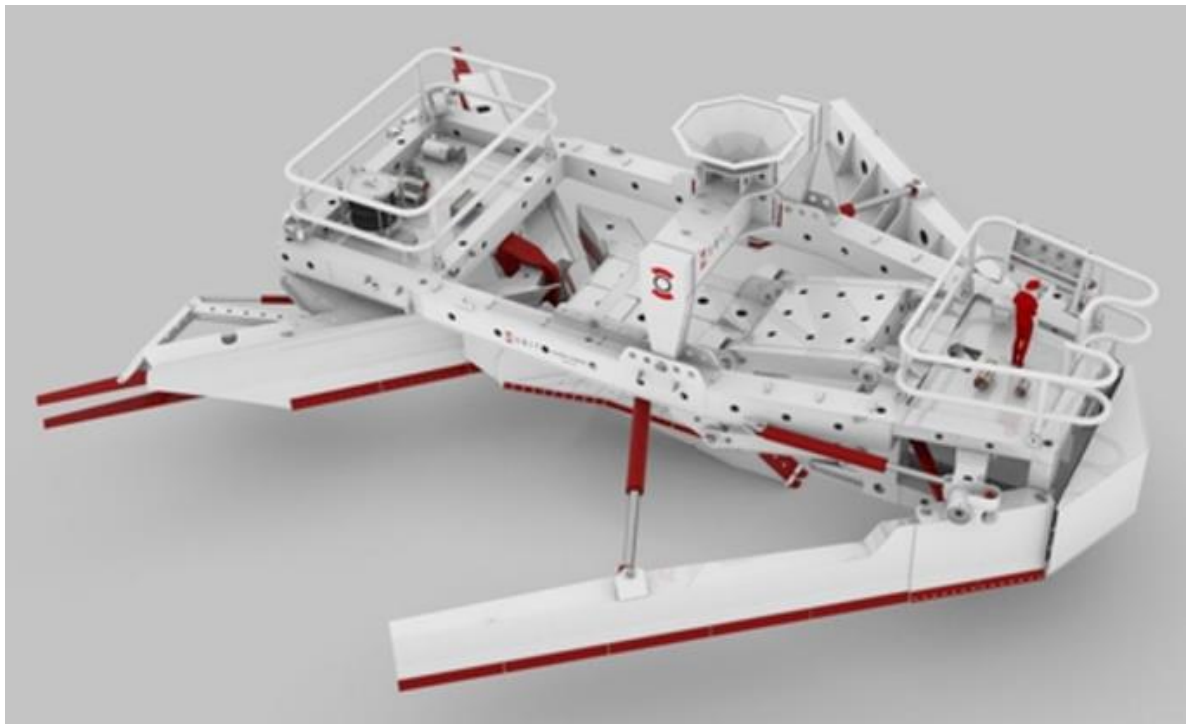


Figure 11: GMG Pre-Lay Plough Design

2.7 Expected Remedial Protection

Table 9 summarises the approximate anticipated length of cable that would remain buried to less than 1m below RSBL under each of the installation scenarios. These are believed to be conservative estimates. This is based on the survey data available which requires interpolation between the

existing sites of geotechnical testing by cores and CPTs and actual conditions may vary between points. Further geotechnical survey and route engineering are likely to improve the estimates.

The geotechnical point locations on Chart 1 in Appendix 3.2 have been colour coded to indicate the level of risk of not achieving the target burial at that point. This assessment is based on the clay stiffness, relative density of sands and depth of pre-sweeping required at that point. Position 124 and 124A which are the closest inshore have the highest risk, whilst 118 and 119 which are the furthest offshore have the lowest based on the sediment types found.

In addition to the risk of reduced burial due to the seabed sediments there is a risk of reduced burial due to boulders or man-made debris lying under the cable during installation. An attempt to qualify this risk over the cable corridor inside the HHW SAC is displayed on Chart 2 in Appendix 3.2. The qualification system is based on the data available showing surface debris and known infrastructure. It is indicative only. Areas assessed as Low risk have no surface debris and so the risk of encountering subsurface objects is lowest. Areas assessed as Medium risk have scattered surface debris and so there is an increased risk of buried objects occurring under the cable route and reducing burial. Finally, areas assessed as High risk are the location of either a significant surveyed debris field, a known wreck location which could be expected to be surrounded by such a field, or are in close proximity to the Bacton to Zebrugge gas pipeline or the UK-Netherlands 14 fibre optic cable. In these areas there is a significant risk, rising to a near-certainty at the pipeline and fibre optic cable locations, that the export cables will not be able to be buried to 1.5m BSB. Out of service cables have not affected the risk classification as it has been assumed that they will be cleared prior to burial operations commencing. By area, Low risk zones cover 53% of the cable corridor, whilst Medium and High risk zones cover 38% and 9% respectively. This has been accounted for in the estimated remedial lengths in Table 9 under the assumptions that final route engineering of the export cables will seek to minimise the crossing length of areas where encountering debris is likely; not all areas where the risk is high or medium will in fact host debris on the exact line of the cable route; and that the pipeline and cable crossings identified will be unavoidable and prevent burial to the target depth of 1.5m over a short section, requiring remedial works.

The estimated remedial protection lengths in Table 9 are therefore a combination of the expected performance of the burial too in the seabed types along the route, based on Global Marine's extensive experience with such tools and an empirical model of performance based on back analysis of these or similar tools where the data are available, and the expected influence of objects and infrastructure expected to be present along the route.

NAME	REMEDIAL PROTECTION LENGTH
SMD Atlas ROV	133.36km (81%)
SMD Q1000 ROV (Jetting)	8.25km (5%)
SMD Q1400 ROV (Jetting)	8.25km (5%)
Power Cable Plough	8.25km (5%)
Pre-Lay Plough (with Atlas post-lay trenching)	11.5km (7%)

Table 9: Remedial Protection Lengths

3.0 APPENDICES

3.1 Supporting Documents

#	NAME	SOURCE
1	Haisborough, Hammond and Winterton SAC http://jncc.defra.gov.uk/page-6534	Joint Nature Conservation Committee
2	GE050-R1 Vol.3 Route Survey_Vattenfall Norfolk Vanguard	Fugro Survey B.V.
3	2210_NVOWF_Installation_Study_002_170925	Global Marine Group
4	Special Area of Conservation (SAC): Haisborough, Hammond and Winterton. SAC Selection Assessment Version 6.0	Joint Nature Conservation Committee

3.2 Charts

CHART	DESCRIPTION	REVISION
1	Overview chart	1
2	Debris risk chart	0

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APPENDIX 3 LIKELY CABLE PROTECTION LOCATIONS

Date	Issue No.	Remarks / Reason for Issue	Author	Checked	Approved
06/11/2019	01D	First draft for Norfolk Boreas Limited review	DT	JL/BT/GK	JL
19/11/2019	02D	Second draft for Norfolk Boreas Limited review	DT	VR	JL
04/03/2020	03D	Final for submission at Deadline 6	DT	VR	JL

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1 BACKGROUND

1.1 Aim of this study

1. The aim of this study is to address some of the comments made by Natural England within their Relevant Representation to the Norfolk Boreas examination (RR-099¹). To achieve this, the study builds on the findings of the Interim cable burial report (provided in Appendix 2 of the HHW SIP) to provide evidence to address Natural England's concerns.
2. The Interim Cable burial report concluded that it may not be possible to bury up to a maximum of 5% of the export cables within the Haisborough, Hammond and Winterton SAC. This study illustrates the areas (referred to as 'zones' in this study) where this 5% is likely to be located.
3. The study also demonstrates that using currently available information and worst case scenario calculations, the extent to which cable protection may interact with features and biotopes found within the SAC will be very small in scale.
4. It is important to note when considering the information presented in this study that cable burial will still be possible throughout much of the identified zones.

1.2 Natural England's Relevant Representation

5. Natural England's Relevant Representation (RR-099) for the Norfolk Boreas project contains Appendix 2.5 which is Natural England's generic position on cable protection. Natural England state in Appendix 2.5 that for Norfolk Boreas, further assessment is required, and the following specific comments were made (the below are selected extracts, the full document is available on the Planning Inspectorate's website¹):

"The Environmental Statement (ES) currently includes an estimate of 8km cable protection within the SAC and 20km within the whole export cable route². [This] is insufficient to adequately assess the impacts. Unless proven otherwise cable protection within the SAC should be assumed to lead to permanent loss of SAC habitat, and accordingly we advise that its use is not permitted within the SAC unless a method can be found that does not lead to habitat loss.

In order for a meaningful assessment to be made the following information is likely to be needed:

¹ <https://infrastructure.planninginspectorate.gov.uk/projects/eastern/norfolk-boreas/?ipcsection=relreps&relrep=37262>

² Norfolk Boreas Limited have since reduced these figures to 4km within the HHW SAC and 16km overall

- *A justification as to why the length given is a realistic amount of cable protection based on previous experience and available information about the ground type along the route.*
 - ***An estimate of the maximum footprint of cable protection to be used in each benthic habitat type – this can be done by feature, subfeature or biotope according to the information available. Licence conditions will be put in place to limit the amount of cable protection to the maximum amount per habitat type rather than along the cable route.***
 - *An assessment of the impact of cable protection on each feature/ sub feature, biotope in terms of habitat loss, habitat change, increase in suspended sediment/ siltation, interruption to physical transport processes.*
6. In response to these comments Norfolk Boreas Limited have undertaken an additional study to provide reassurance that cable protection is only likely to be placed in areas which would not affect the integrity of the Haisborough Hammond and Winterton SAC. The results of this study are provided in this Appendix (3) of the Norfolk Boreas Haisborough Hammond and Winterton SAC Site integrity Plan.
7. Norfolk Boreas Limited do not believe that licence conditions should be put in place to limit the maximum amount of cable protection per habitat. The overall limit secured within the draft DCO (document reference 3.1), has been assessed within the Information to support Habitats Regulations Assessment which concluded no Adverse Effect on Integrity (see section 4 of the main Outline Norfolk Boreas Haisborough Hammond and Winterton (HHW) Special Area of Conservation (SAC) Site Integrity Plan (SIP)).
8. Natural England comment in their Relevant Representation that:
- “It is noted that the Applicant’s use of the Site Integrity Plan (SIP) defers this assessment until post consent. Therefore it is unclear how the regulators will address this point”.*
9. In response to this comment it is important to note that Norfolk Boreas Limited maintain that a worst case scenario has been presented and assessed in the Information to support HRA (document 5.3 of the Application, APP-201). However, Norfolk Boreas Limited recognise that further assessment would be required and the appropriate time to undertake this type of study, would be once the detailed design of the project and the results of interim and pre-construction surveys (as required under condition 13(2)(a) of the transmission DMLs (Schedules 11 and 12 of the DCO)) are available. Thus, the study provided here is indicative and would be required to

be updated once additional information is known, as per the requirements of the final HHW SIP.

1.3 Assumptions and data used

10. In order to undertake this study, the following assumptions have been made:

1.3.1 *S.spinulosa* reef

11. Norfolk Boreas Limited employed Envision Mapping Limited to undertake a mapping exercise to predict the current location and extent of *S.spinulosa* reef within the Norfolk Boreas offshore cable corridor (Appendix 7.2 of the Information to support HRA, document reference 5.3.7.2 of the Application). Natural England have questioned some of the methods used in that study and both Natural England and the MMO (Relevant Representation RR-099 and RR-069 of the Norfolk Boreas Examination) advocate maps produced by Natural England and JNCC which show “Areas to be managed as *Sabellaria* reef” and therefore it is these maps that are used in this study.

12. Of the areas to be managed as *S.spinulosa* reef Natural England have selected two within the Norfolk Boreas cable corridor as “top priority sites” for management of reef due to the good evidence base and likelihood for reef to recover. (see Appendix 2.2 paragraph, 1.4.2 and 1.4.7 of Natural England’s Relevant Representation (RR-099).

1.3.2 Justification of why the length of cable protection used for sub optimally buried cables is realistic

13. The interim cable burial report provided in Appendix 2 of the main HHW SIP concludes that cable burial is likely to be possible in the vast majority of locations. However, as a result of that study it was calculated conservatively that for, up to 5% of the length of export cable within the SAC, it may not be possible to undertake full burial. It should be noted that the 5% is a worst case figure, based on currently available cable burial techniques, and therefore, this figure may be reduced as more efficient cable burial techniques become available.

14. 5% of the Norfolk Boreas export cables within the HHW SAC equates to 4km of cable. If cable burial is not possible, cable protection would be required to ensure the integrity of the cables and ensure the safety of other marine users.

1.3.3 Areas where cable protection is more likely to be required

15. As part of the interim cable burial assessment (Appendix 2 of this document), zones where cable burial was predicted to be more difficult were identified.

16. The up to 4km of cable which may not be buried would therefore be situated within these zones. It should be noted that the zones do not identify locations where cable burial will be impossible, only areas where cable burial could be more difficult.

2 METHODOLOGY

17. A series of maps have been produced to show the zones where cable protection is more likely to be required and the overlap with the following:
 - Areas to be managed as *S.spinulosa* reef (provided by Natural England);
 - Biotopes identified from the surveys of the Norfolk Boreas offshore cable corridor;
 - Areas to be managed as sandbanks which are slightly covered by water at all times (provided by Natural England).
18. Calculations were made using the maximum realistic length of cable that is likely to be required to cross these zones multiplied by 5m which is the maximum width of the cable protection. Where these overlapped with the features and biotopes listed above the maximum realistic area of overlap (or footprint) was calculated.
19. As shown in Table 3.1 of the HHW SIP main report, a maximum of up to 20,000m² of cable protection could be required to be placed within the HHW SAC as a result of failure to bury cables (based on the Interim Cable Burial Report (Appendix 2) and 5m width of cable protection). The total amount of cable protection that could be installed by Norfolk Boreas within the SAC is secured through Condition 3 (1) (f) of the Transmission DMLs (Schedules 11 and 12) of the draft Norfolk Boreas DCO (Document reference 3.1). The total secured within the DCO also allows for cable protection as a result of cable crossings (see Table 3.1 of the HHW SIP main report for further detail).
20. Therefore, calculations of the maximum area of overlap of cable protection and feature or biotope, are either based on an area of 20,000m², or, if it is clear from the maps that 20,000m² would be an overestimate, a more precise calculation has been used based on the maximum realistic length of cable protection within that biotope. Therefore, it important to recognise that the calculated worst case scenarios for each biotope should not be aggregated, and the total cable protection would not exceed 20,000m², throughout the entire HHW SAC.
21. The same methods have then been used to calculate the cumulative areas of overlap with the Norfolk Vanguard project, thus providing cumulative areas of effect.
22. It is important to note that cable burial will still be possible throughout much of the identified zones

3 RESULTS

23. The results of the mapping exercise are presented in the following sections. When interpreting the maps it is important to consider the following:
- Cable burial is still likely to be possible in much of each of the zones the indicative cable routes transect;
 - Some of the zones where cable protection could be required may be avoided altogether; and
 - The maps show the longest realistic route (indicative cable route) through each zone. This is to ensure that a worst case scenario is considered. In reality, a shorter route could be taken.

3.1 Cable protection required at crossings

24. There are two linear features that have been identified where cable protection will be required. These are the Bacton-Zeebrugge gas pipeline and the Tampnet telecommunications cable connecting Lowestoft with Norway (Figure 1). Cable protection will be required to protect the Norfolk Boreas cables as they cross these assets (see section 5.5.1 of the main HHW SIP document for further explanation on cable crossings). As there is already introduced hard substrate due to the presence of the cable and the pipeline, additional hard substrate in the form of cable protection for the Norfolk Boreas cables would not affect Annex I features at these locations.
25. It can be seen in Figure 1 that the only locations where cable protection could be required which overlap with the areas to be managed as *S.spinulosa* reef are at the cable and pipeline crossings described above. There is no overlap between any of the zones and areas to be managed as *S.spinulosa* reef.

3.2 Potential areas of cable protection due to inability to bury

26. Excluding the locations where cable crossings would be required (section 3.1), the work completed to support the Interim cable burial assessment (Appendix 2) identified four main zones where cable burial will be more difficult and therefore cable protection may be required. These are labelled A to D in all Figures below.
27. Three other areas where cable burial may not be possible were identified however these were due to the presence of wrecks. These would be avoided by the project due to Archaeological Exclusion Zones (see Chapter 17 offshore Archaeology and Cultural Heritage of the ES, APP-230) and therefore no cable protection would be placed in these areas.
28. The maximum realistic length of cable required to cross each zone (shown in Figure 1) is provided in Table 3.1.

Table 3.1 Maximum length of cable required to cross each zone

Location	Maximum length of export cables required to cross each zone (m) (for two export cables)
A	3,374
B	2,392
C	2,782
D	1,336
Note the maximum area of cable protection would not exceed 20,000m ² in the SAC	

29. It should be noted that the lengths presented in Table 3.1 are the maximum realistic length of cable required to cross each zone. Much of this would be buried however it may not be possible to bury all cable within each zone. As stated in section 2, a maximum of 20,000m² of cable protection due to unburied cable could be placed within the HHW SAC and this would come from within the four zones.

3.3 Maximum possible footprint of cable protection in each feature or biotope

3.3.1 Areas to be managed as *Sabellaria* reef

30. As shown in Figure 1, no zones where cable protection could be required as a result of unburied cables overlap with the areas to be managed as *S.spinulosa* reef. Therefore, based on current evidence it is highly likely that Norfolk Boreas Limited would be able to avoid placing cable protection, required as a result of failure to bury cable, within the areas to be managed as *S.spinulosa* reef.

3.3.2 Biotopes

31. The area of each biotope was derived from a survey of the Norfolk Boreas offshore cable corridor which was undertaken in Autumn 2016. The survey report is contained in appendix 7.3 of the Information to support Habitats Regulations Assessment (document reference 5.3.7.3, APP-208) of the Norfolk Boreas application. The resultant biotope maps only include the offshore cable corridor and not the wider SAC. Therefore, the areas occupied by each biotope have been calculated from the overlap of that biotope with the SAC. In reality the area of each biotope within the SAC would be far greater and therefore the percentage figures quoted below would be much lower.
32. Figure 2 shows that there is potential for cable protection to be placed within biotope “Potential SS.SBR.PoR.SspiMx” (*Sabellaria spinulosa* on stable circalittoral mixed sediment) within zone B. The length of indicative cable route overlapping with this biotope is 961m per cable. Cable protection would be up to 5m in width and therefore the maximum potential footprint of cable protection within Potential SS.SBR.PoR.SspiMx biotope would be 9,610m². This equates to 0.09% of the identified area of Potential SS.SBR.PoR.SspiMx within the overlap between the Norfolk Boreas offshore cable corridor and the SAC. As agreed with Natural England through the Evidence Plan Process (see the Consultation Report document reference

5.1 of the application, APP-027 for further detail) the biotope SS.SBR.PoR.SspiMx does not necessarily support *S.spinulosa* reef, however it can be used as an indication that reef could potentially develop under the right conditions.

33. Figure 2 shows that overlap with biotope SS.SCS.CCS (Circalittoral coarse sediment) could occur within zone A. The maximum length of cable required for the two export cables to cross zone A would be 3,374m and therefore the maximum possible footprint of cable protection which could be installed in location A would be 16,870m². This would equate to 0.15% of the area occupied by the SS.SCS.CCS biotope within the section of the offshore cable corridor that is located within the SAC.
34. Figure 2 shows that overlap with biotope SS.SSa.CFiSa (Circalittoral fine sand) could occur within zones B, C and D. Due to the fact that this biotope is present within the three zones B, C and D the maximum footprint of cable protection that could be located across these zones would be 20,000m². This would equate to 0.02% of the area occupied by the SS.SSa.CFiSa biotope within the section of the offshore cable corridor that is located within the SAC.

3.3.3 Areas to be managed as sandbanks which are slightly covered by seawater at all times

35. Figure 3 shows that, although it would be possible at all of the zones to ensure that cable protection is placed outside of the confirmed Annex I sandbank features (shown in yellow), the worst case scenario would be that up to the full 20,000m² may be placed in “potential Annex I sand bank” and this would equate to 0.003% of the total area of sandbanks within the SAC³.

3.3.4 Summary of maximum footprints of cable protection within features and biotopes

36. Table 3.2 provides a summary of the maximum footprint of cable protection that could be placed within each biotope and feature within the HHW SAC and the percentage area of each biotope and feature that would be affected by the cable protection.

³ <http://natura2000.eea.europa.eu/Natura2000/SDF.aspx?site=UK0030369>

Table 3.2 Summary of the maximum worst case footprints of cable protection which could be placed within each features and biotopes of the HHW SAC for the Norfolk Boreas project alone.

Feature or biotope	Potential footprint of cable protection (m ²)	Known area of Feature/biotope within the SAC (m ²)	% of feature or biotope occupied by cable protection
Areas to be managed as <i>S.spinulosa</i> reef	No overlap	Unknown	0%
Potential SS.SBR.PoR.SspiMx	9,610	11,235,914*	0.09%
Potential SS.SCS.CCS.MedLumVen	No overlap	884,023*	0%
SS.SCS.CCS	16,870	13,046,137*	0.15%
SS.SSa.CFiSa	20,000	83,884,219*	0.02%
Areas to be managed as Annex I Sandbank	20,000	669,000,000**	0.003%

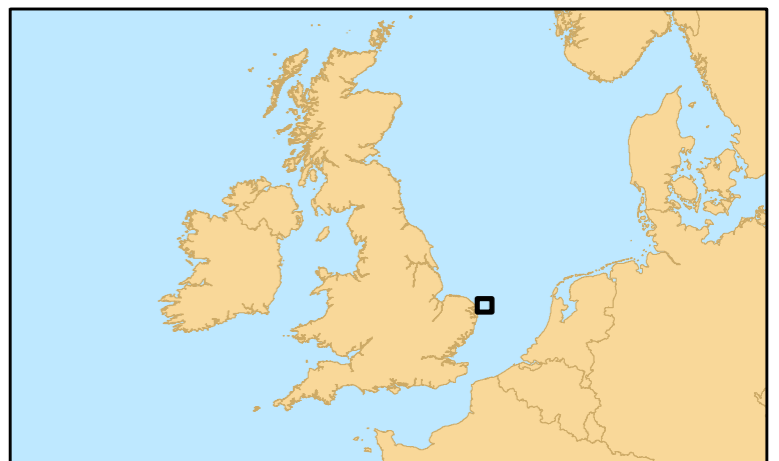
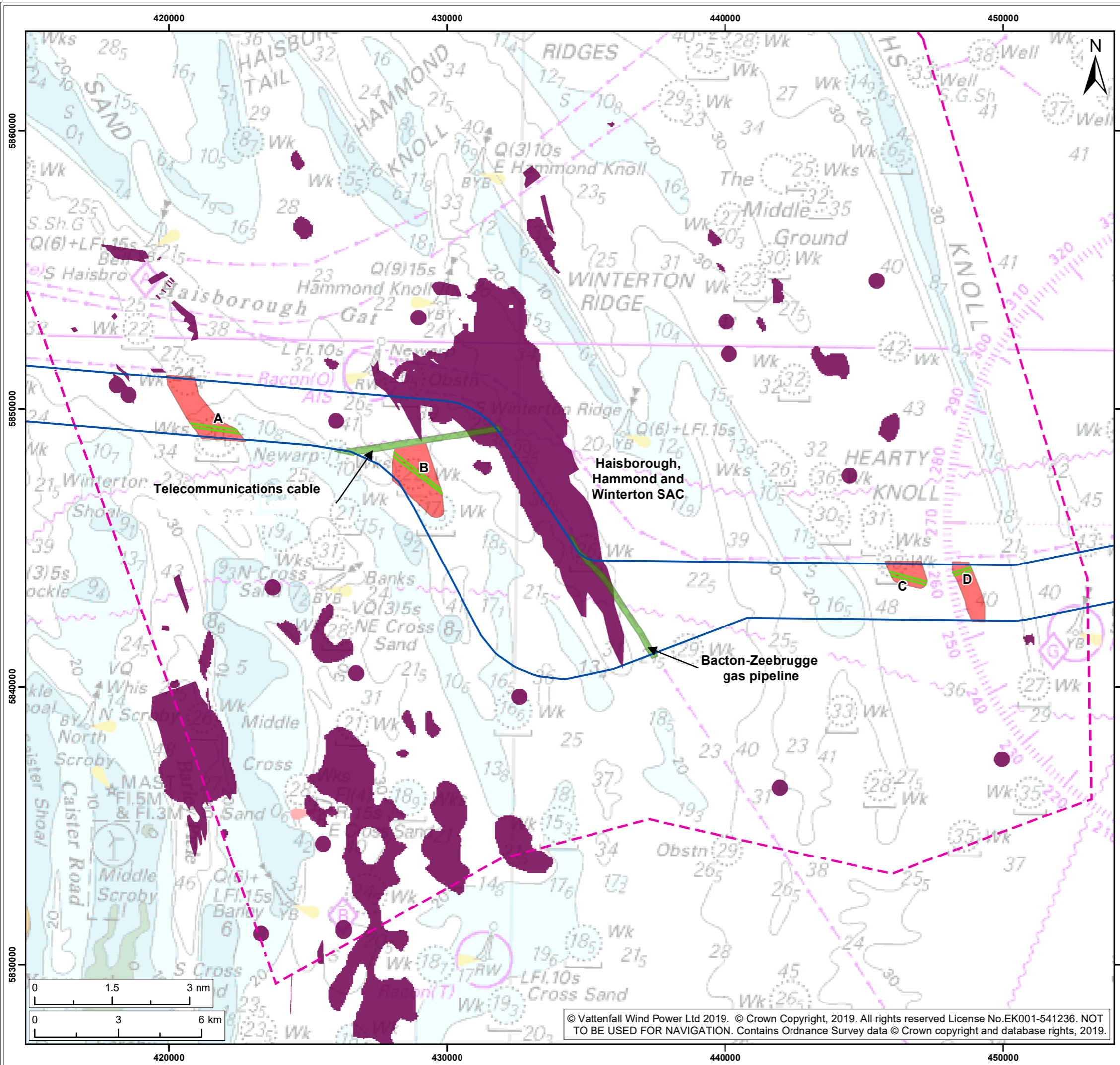
* Known area within the section of the cable corridor that overlaps with the SAC.

**Known area within the full SAC

37. As set out above, these figures should not be aggregated. Cable burial will still be possible throughout much of the identified zones, however, the worst case scenarios for each biotope are presented in Table 3.2. As concluded in Appendix 2, it may not be possible to bury up to 5% of the export cable within the SAC. This would equate to a maximum total area of 20,000m² of cable protection throughout the entire HHW SAC.

3.4 Assessment of the impact of cable protection on each feature/ sub feature, biotope

38. Natural England request that “*further assessment*” is carried out to assess the impacts to each biotope (see the third bullet point in section 1). However, the conclusions of considering the maximum footprint in each habitat, show that these are well within the worst case scenarios assessed with the EIA and the Information to Support HRA report (document 5.3) and therefore no further assessment is considered necessary.



- Legend:
- Offshore cable corridor
 - Zones where cable protection could be required
 - Cable protection required due to crossing infrastructure
 - Special Area of Conservation (SAC)¹
 - Area to be managed as *S. spinulosa* reef (Natural England)²
 - Indicative cable route

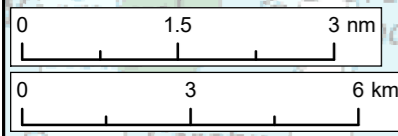
¹ JNCC, 2019.
² Natural England/MALSF, 2013/2011

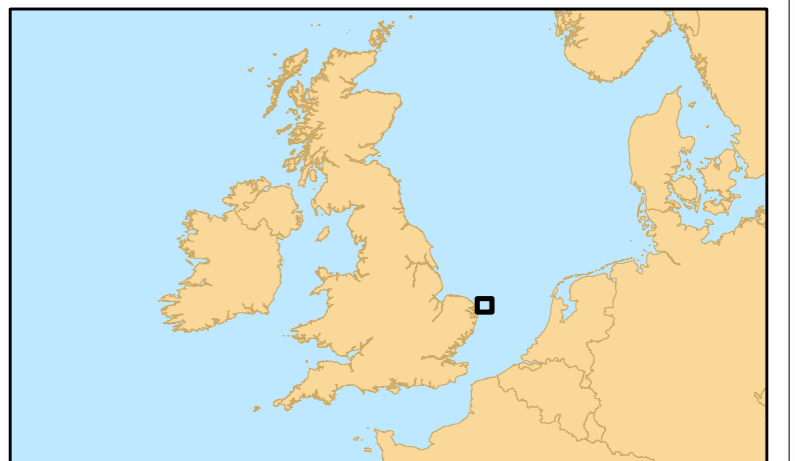
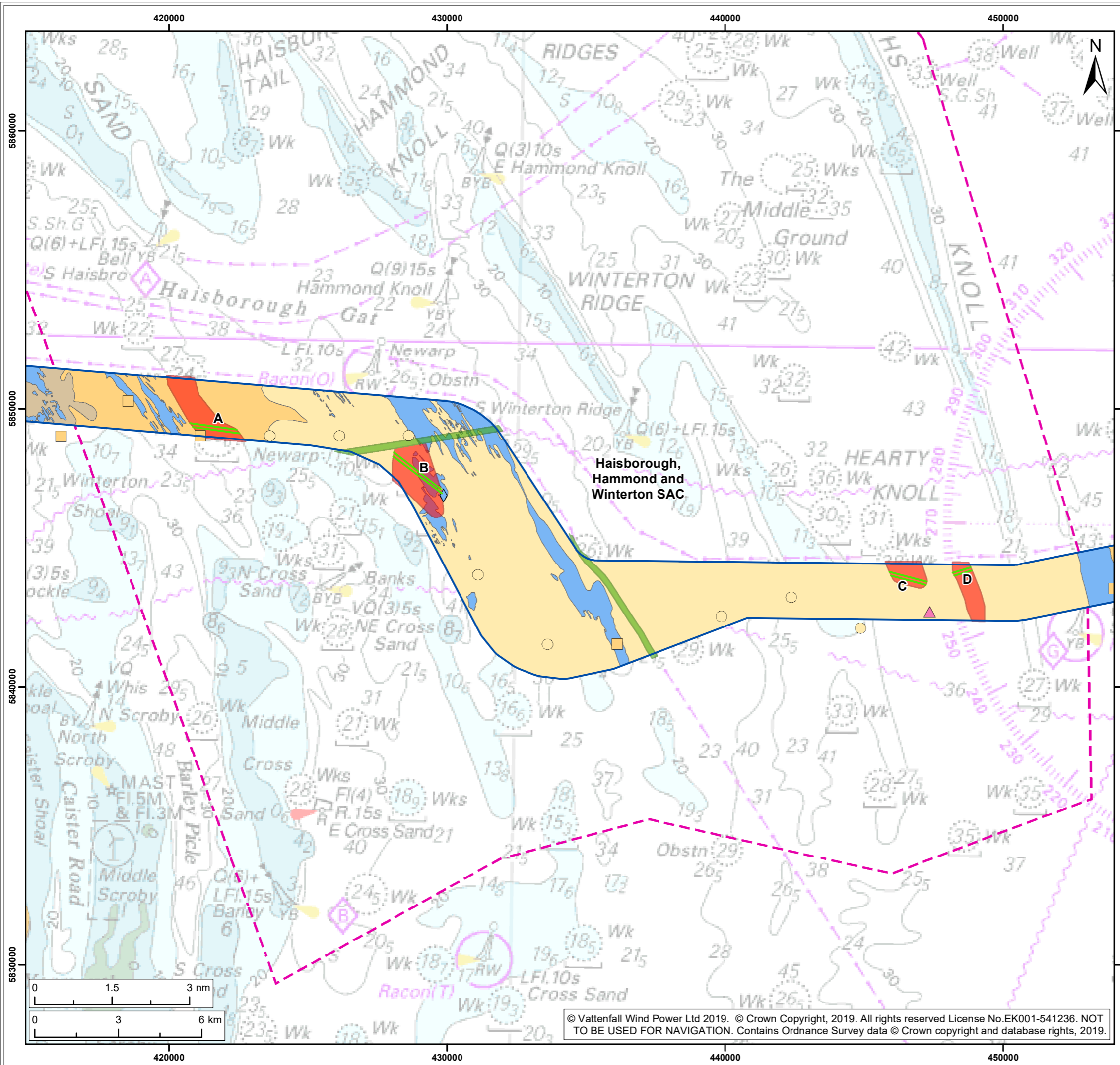
Project: Norfolk Boreas	Report: Appendix 3 of the Outline HHW SAC CSIMP
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Title:
Indicative cable protection locations and Area
to be managed as Sabellaria reef

Figure: 1	Drawing No: PB5640-008-007-003				
Revision:	Date:	Drawn:	Checked:	Size:	Scale:
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01	05/11/2019	JT	DT	A3	1:135,000

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





Legend:

- Offshore cable corridor
- Zones where cable protection could be required
- Cable protection required due to crossing infrastructure
- Special Area of Conservation (SAC)¹

Norfolk Vanguard and Offshore cable corridor biotope interpretation²

- SS.SCS.CCS
- SS.SSa.CFiSa
- Potential SS.SCS.CCS.MedLumVen
- Potential SS.SBR.PoR.SspiMx

Biotope²

- SS.SCS.CCS
- SS.SSa.CFiSa
- ▲ SS.SMu.CSaMu
- ◆ SS.SBR.PoR.SspiMx

— Indicative cable route

¹ JNCC, 2019.
² Fugro, 2016.

Project: Norfolk Boreas	Report: Appendix 3 of the Outline HHW SAC CSIMP
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Title:
Indicative cable protection locations and Biotopes

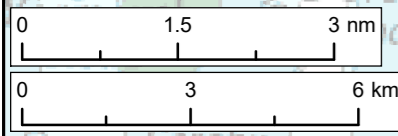
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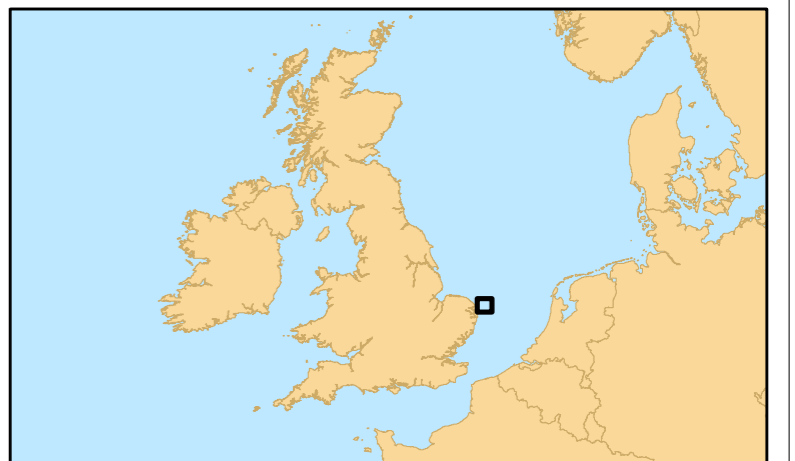
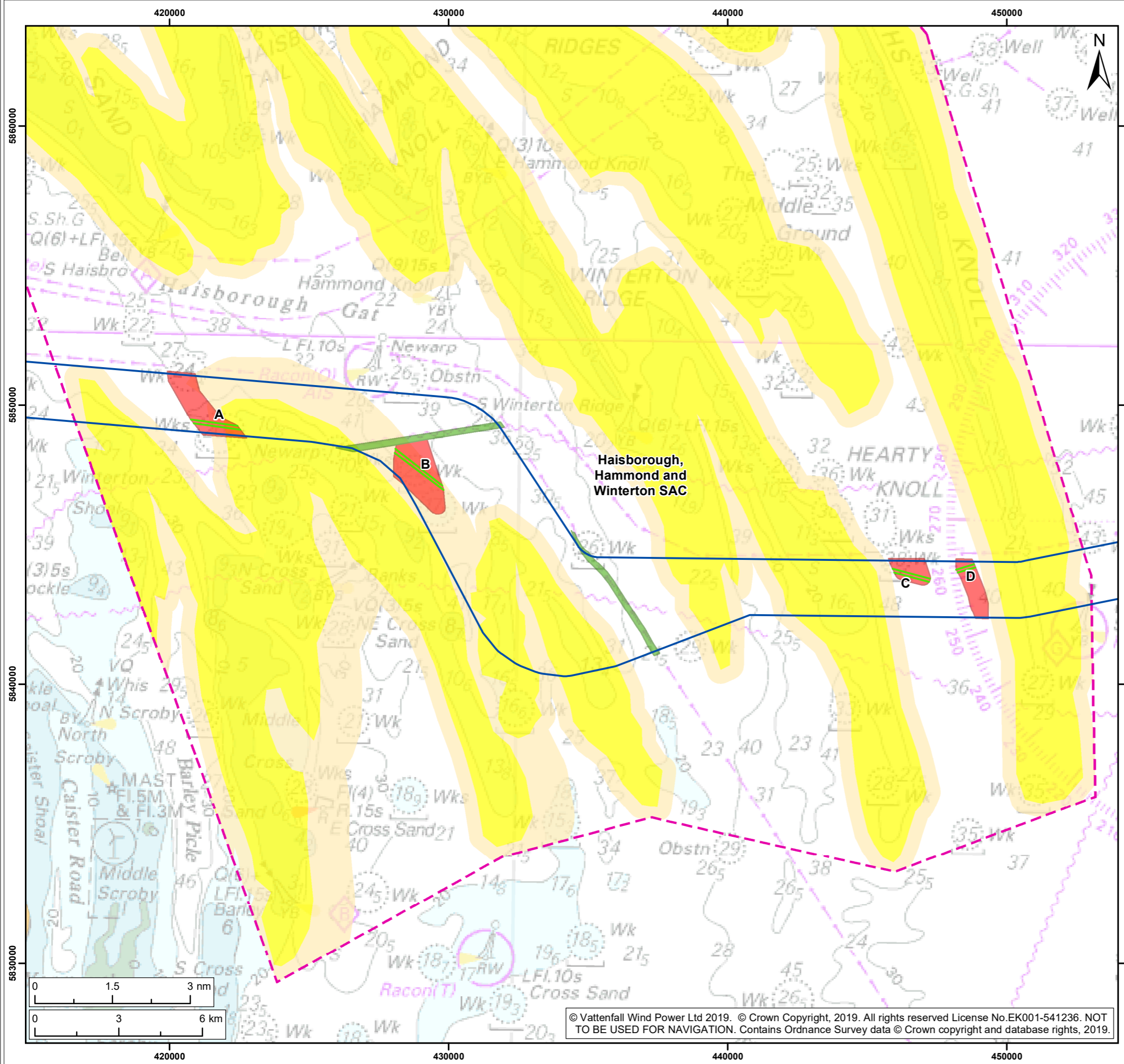
Co-ordinate system: ETRS 1989 UTM Zone 31N EPSG: 25831

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Legend:

- Offshore cable corridor
- Zones where cable protection could be required
- Cable protection required due to crossing infrastructure
- Special Area of Conservation (SAC)¹
- Indicative cable route

Areas to be managed as sandbanks which are slightly covered by seawater at all times²

- Annex 1 Sandbank
- Potential Annex 1 Sandbank

¹ JNCC, 2019.
² JNCC, 2016.

Project: Norfolk Boreas	Report: Appendix 3 of the Outline HHW SAC CSIMP
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Title:
 Indicative cable protection locations and areas to be managed as sandbanks which are slightly covered by seawater at all times.

Figure: 3	Drawing No: PB5640-008-007-005				
Revision:	Date:	Drawn:	Checked:	Size:	Scale:
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01	05/11/2019	JT	DT	A3	1:135,000

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

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3.5 Cumulative affects

39. Figures 4 to 6 below show the zones within which cable protection could be required for both Norfolk Boreas and Norfolk Vanguard projects. Using the maximum cable lengths and a cable protection width of 5m, the areas of potential overlap with the features and biotopes have been calculated and are shown in Table 3.3.

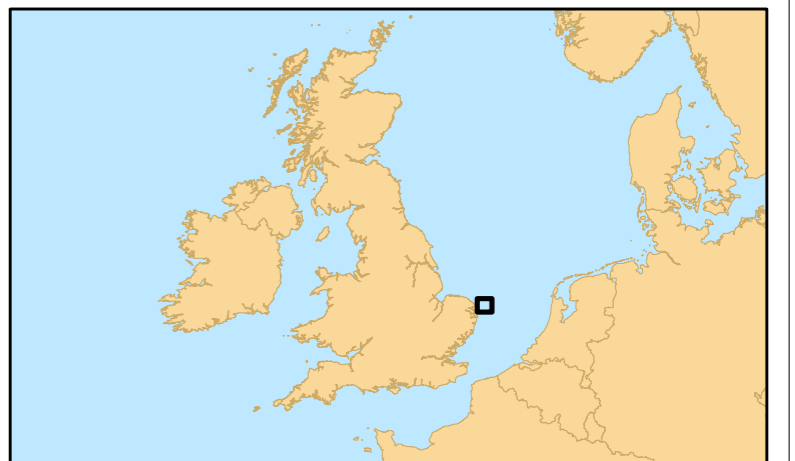
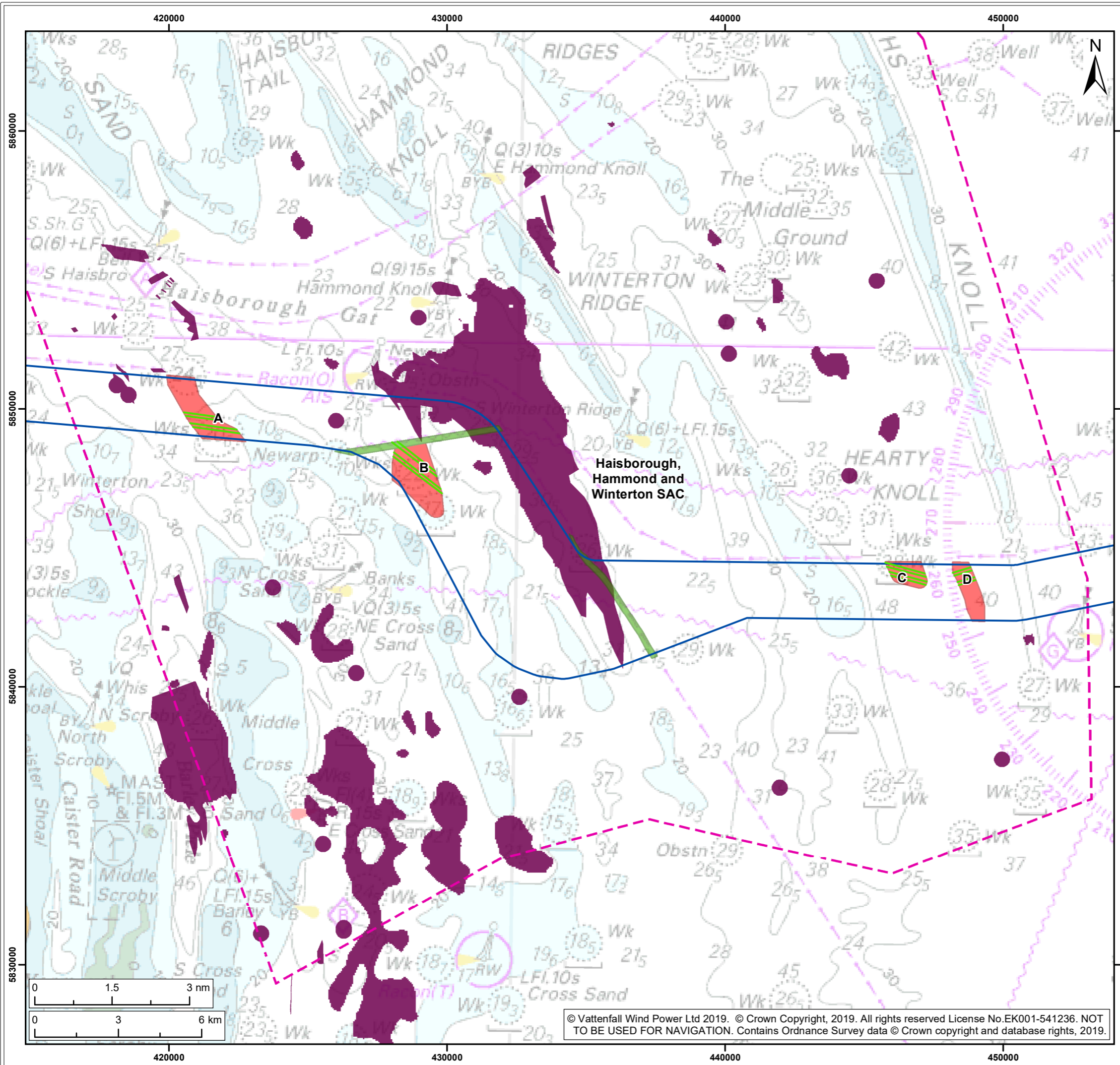
Table 3.3 Summary of the maximum worst case footprints of cable protection which could be placed within features and biotopes of the HHW SAC for Norfolk Boreas and Norfolk Vanguard.

Feature of biotope	Potential footprint of Norfolk Boreas cable protection location (m ²)	Potential footprint of Norfolk Vanguard cable protection location (m ²)	Known area of Feature/biotope within the SAC (m ²)	% of feature or biotope occupied by the combined cable protection
Areas to be managed as <i>S.spinulosa</i> reef	No overlap	No overlap	Unknown	0%
Potential SS.SBR.PoR.SspiMx	9,610	5,653	11,235,914*	0.14%
Potential SS.SCS.CCS.MedLumVen	No overlap	No overlap	884,023*	0%
SS.SCS.CCS	16,870	12,090	13,046,137*	0.22%
SS.SSa.CFiSa	20,000	20,000	83,884,219*	0.05%
Areas to be managed as Annex I Sandbank	20,000	20,000	669,000,000*	0.006%

* Known area within the section of the cable corridor that overlaps with the SAC.

**Known area within the full SAC

40. As noted above, these figures should not be aggregated. Cable burial will still be possible throughout much of the identified zones, however, the worst case scenarios for each biotope are presented in Table 3.3. As concluded in Appendix 2, it may not be possible to bury up to 5% of the export cable within the SAC. This would equate to a maximum total area of 20,000m² of cable protection throughout the entire HHW SAC.



- Legend:
- Offshore cable corridor
 - Zones where cable protection could be required
 - Cable protection required due to crossing infrastructure
 - Special Area of Conservation (SAC)¹
 - Area to be managed as *S. spinulosa* reef (Natural England)²
 - Indicative cable route

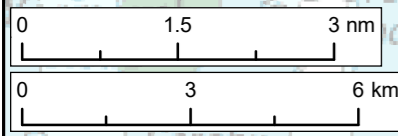
¹ JNCC, 2019.
² Natural England/MALSF, 2013/2011

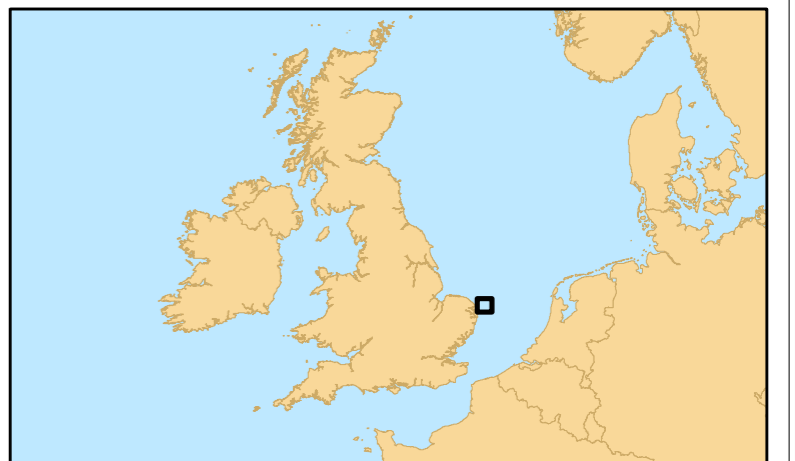
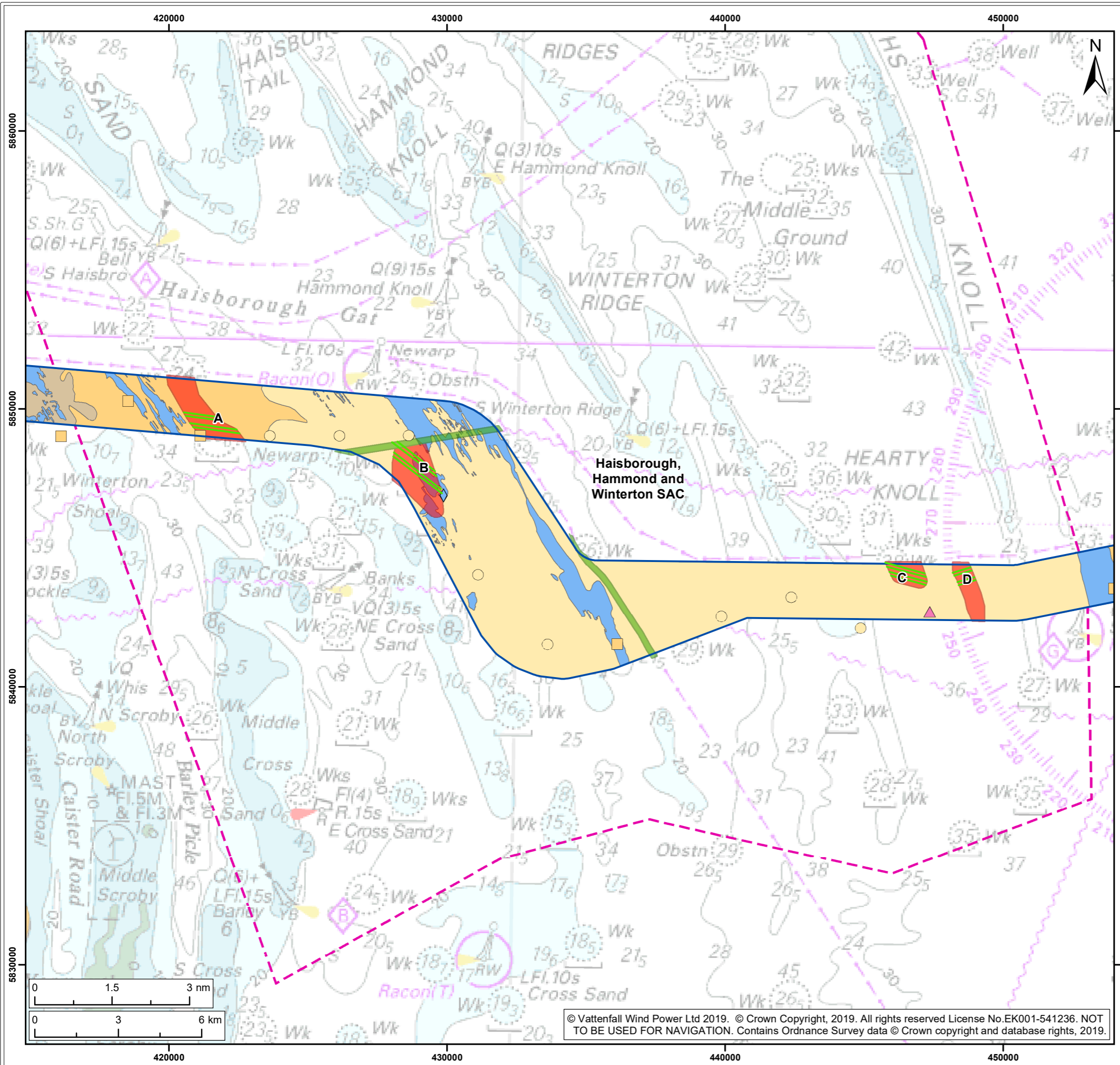
Project:	Report:
Norfolk Boreas	Appendix 3 of the Outline HHW SAC CSIMP

Title:
 Cumulative impacts with Norfolk Boreas - Sabellaria Reef

Figure:	4	Drawing No:	PB5640-008-007-006			
Revision:	Date:	Drawn:	Checked:	Size:	Scale:	
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01	05/11/2019	JT	DT	A3	1:135,000	

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





Legend:

- Offshore cable corridor
- Zones where cable protection could be required
- Cable protection required due to crossing infrastructure
- Special Area of Conservation (SAC)¹

Norfolk Vanguard and Offshore cable corridor biotope interpretation²

- SS.SCS.CCS
- SS.SSa.CFiSa
- Potential SS.SCS.CCS.MedLumVen
- Potential SS.SBR.PoR.SspiMx

Biotope²

- SS.SCS.CCS
- SS.SSa.CFiSa
- SS.SMu.CSaMu
- SS.SBR.PoR.SspiMx

Indicative cable route

¹ JNCC, 2019.
² Fugro, 2016.

Project: Norfolk Boreas	Report: Appendix 3 of the Outline HHW SAC CSIMP
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Title:
Cumulative impacts with Norfolk Boreas - Biotopes

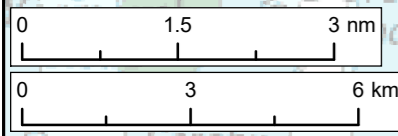
Figure: 5	Drawing No: PB5640-008-007-007				
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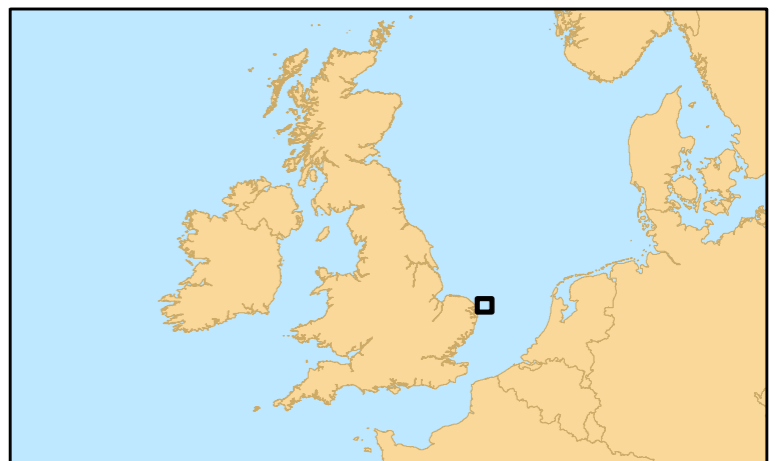
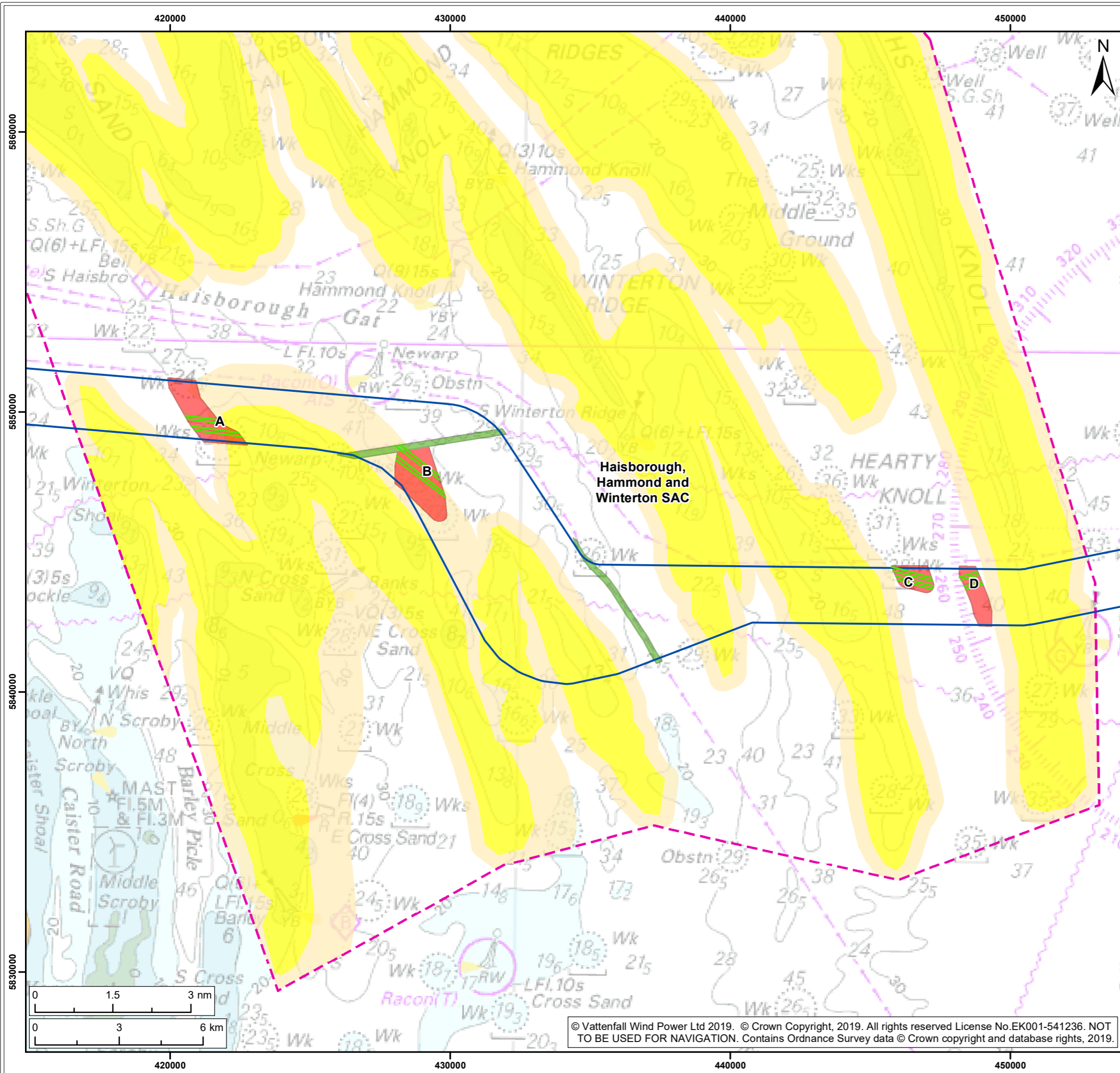
Co-ordinate system: ETRS 1989 UTM Zone 31N EPSG: 25831

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Legend:

- Offshore cable corridor
- Zones where cable protection could be required
- Cable protection required due to crossing infrastructure
- Special Area of Conservation (SAC)¹
- Indicative cable route

Areas to be managed as sandbanks which are slightly covered by seawater at all times²

- Annex 1 Sandbank Area
- Potential Annex 1 Sandbank

¹ JNCC, 2019.
² JNCC, 2016.

Project: Norfolk Boreas	Report: Appendix 3 of the Outline HHW SAC CSIMP
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Title:
 Cumulative impacts with Sandbanks

Figure: 6	Drawing No: PB5640-008-007-008				
Revision:	Date:	Drawn:	Checked:	Size:	Scale:
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4 CONCLUSION

41. This study illustrates that, based on current available evidence, it is unlikely that there would be a requirement to install cable protection to protect unburied cables within the areas that Natural England and the JNCC have defined as “areas to be managed as *S.spinulosa* reef”.
42. There is potential for cable protection to be placed within areas of the following biotopes: SS.SBR.PoR.SspiMx” (*Sabellaria spinulosa* on stable circalittoral mixed sediment); biotope SS.SSa.CFiSa (Circalittoral fine sand) and SS.SCS.CCS (Circalittoral coarse sediment), however the area covered by that cable protection would be very small, equating to no more than 0.15% of the known area of each biotope existing within that part of the offshore cable corridor that crosses the HHW SAC.
43. There is potential for cable protection to be placed within “Areas to be managed as sandbanks which are slightly covered by sea water all the time”. However, this would cover a small area, approximately 0.003% of the known area and potential area of that feature within the SAC and would therefore not affect the form and function of the sandbank features.
44. The cumulative areas of overlap with Norfolk Vanguard cable protection also shows there would be no overlap with the areas to be managed as *S.spinulosa* reef, the maximum overlap with identified biotopes would be 0.22% and the combined overlap with areas to be managed as Annex I sandbanks would be 0.006%. This has been assessed within the Information to Support HRA (document reference 5.3 of the application, APP-201) which concluded there would be no adverse effect on integrity.
45. In summary this study demonstrates that:
 - Cable protection placed due to an inability to bury cables is likely to avoid areas to be managed as *S.spinulosa* reef;
 - Cable protection may be placed in areas to be managed as Annex I Sandbanks, however, this would be a very small percentage of that feature and it may be possible to avoid that feature altogether; and
 - Cable protection may be placed within areas occupied by four different biotopes, however this would be a very small percentage of the areas occupied by those biotopes within the SAC and it may be possible to avoid some of these biotopes altogether.