

Date: 29 July 2020
Our ref: Case: 10570, Consultation: 322689
Your ref: EN010087



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BY EMAIL ONLY

Dear Frances Fernandes

RE: Application by Norfolk Boreas Limited for an Order Granting Development Consent for the Norfolk Boreas Offshore Wind Farm

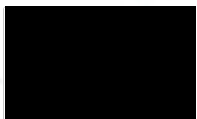
The following constitutes Natural England's statutory response at Deadline 13 of the Norfolk Boreas Examination:

- Natural England's response to the Rule 17 Request for Information.

Please note, the questions posed in the Rule 17 Request for Information cover all of the issues Natural England had intended providing an update on following the Secretary of State's decision on Norfolk Vanguard Offshore Wind Farm and letter on Hornsea Project Three. Therefore our responses to these questions should be used to provide Natural England's most recent position.

For any queries relating to the content of this letter please contact me using the details provided below.

Yours sincerely



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THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010

NORFOLK BOREAS OFFSHORE WIND FARM

Planning Inspectorate Reference: EN010087

Deadline 13

Natural England's response to the Examining Authority's Rule 17 Letter

29th July 2020

Our Ref: NE.NB.D13.02.Rule17

	Respondent:	Deadline for Response:	Question:	Natural England response:
General				
R17.1.1	Natural England, RSPB	D13	In the light of the SoS decision letters for Norfolk Vanguard and Hornsea THREE published on 1 July 2020, can NE and the RSPB give their current positions for the Proposed Development.	There is no change in our current position in light of the Secretary of State (SoS) decision letters for Norfolk Vanguard and Hornsea Project Three published on 1 July 2020. However, we are still in the process of considering the information in the SoS decision letters and may update our position further in due course. We will provide a further update at Deadline 14 and we are engaging with the Applicant between deadlines.
Level of Precaution				
R17.1.2	Applicant, Natural England, RSPB	D13	To provide the latest considerations on the level of precaution applied to the significance of impacts on seabird populations, and how headroom could be taken into consideration when assessing AEOI.	<p>Our position on precaution (individual components of precaution and the accumulation of these) remains as that set out in our previous responses. Please see REP4-039, REP4-040, REP4-043, our response to ExA second round question 2.8.4.4 in REP5-077 and our response to ExA third round question 3.8.4.1 in REP7-049.</p> <p>In summary, there is variability and/or uncertainty in most of the aspects of the assessments, including:</p> <ul style="list-style-type: none"> • Assessments are based on 2 years of

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				<p>survey data and the distribution of birds in the marine environment appears to be highly variable between days, seasons, years and even time of day. It is likely that for example, 24 days of surveys over 2 years - approximately 3.3% of the total number of 720 days - do not fully capture the full extent of variation in density/abundance of seabirds that can be present within the survey areas during the 2 year period, including low as well as high counts, let alone over the 30-year period of the lifespan of the project. It is therefore appropriate for assessments to present and consider values from both lower and upper 95% confidence limits.</p> <ul style="list-style-type: none"> • Empirical evidence is scarce or lacking in many areas of the assessments, including around empirical avoidance rates of birds at offshore sites (just one study from Thanet offshore wind farm) and mortality rates from displacement. <p>Therefore, in order to reflect such potential variability and uncertainty in assessments, it is appropriate to apply precaution and</p>

	Respondent:	Deadline for Response:	Question:	Natural England response:
				<p>hence Natural England’s advice to take a range based-approach to assessments. We note that in both the Hornsea Project Three and Norfolk Vanguard decisions, the SoS was satisfied that outputs using Natural England’s preferred parameters were suitably precautionary to use as a basis of his impact assessments.</p> <p>However, we note that the potential limitations in recording of site-specific data on seabird flight heights and the inevitable reliance on generic (Johnston et al. 2014) flight height data may have the potential to lead to underestimates of potential collisions and hence assessments may be lacking in precaution in this aspect.</p> <p>Our position regarding headroom remains as that set out in our previous responses (REP6-049, REP7-048 and our response to the Applicant’s response to ExA question 3.2.1.2 in REP9-042). In summary, we again acknowledge the work that the Norfolk Boreas Applicant and their consultants have done to consider potential headroom in the in-combination/cumulative collision risk figures by assessing the ‘as built’ rather than the worst case scenario (WCS). Natural England recognises that</p>

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				<p>headroom is a significant issue, however it is a highly complex one, and it is important to note that there is not yet an agreed way forward at present. The Applicant's approach has also not been subjected to judicial scrutiny. There are issues/uncertainties associated with the Applicant's proposed approach, and issues with the approach developed by MacArthur Green for The Crown Estate (TCE), and hence Natural England's advice that it is not used. Until these issues are addressed and an industry wide approach is agreed we recommend that the default 'standard' approach is appropriate. We do not disagree that there is likely to be some headroom; however the exact extent of any potential headroom is not agreed. We note that the HRA for Norfolk Vanguard refers to 'headroom' in the context of the Flamborough and Filey Coast (FFC) SPA kittiwake, but does not specify the evidence that supports this view, or seek to quantify the extent of 'headroom' that is available.</p> <p>If this is conducted simply on a project-by-project basis this has significant risks of inconsistency of approach across applications. Therefore, we consider that</p>

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				<p>this issue needs to be addressed strategically on behalf of the whole sector, including developing consensus on an approach. However we do recognise that this is not possible in timescale for the Norfolk Boreas examination, and therefore we continue to recommend that 'consented' values are used.</p> <p>With regard to the revised collision predictions the Applicant has calculated for the Hornsea Project One 'as built' layout, Natural England notes the queries we have raised in REP6-049 regarding uncertainties over whether the correct density data has been used and concerns regarding use of only Option 1 figures and concerns highlighted regarding site-specific flight heights used in the CRM of Hornsea projects. Whilst these matters are outstanding it would not be safe to assume that Hornsea Project One provides the headroom calculated.</p>
Cumulative Effects				
R17.1.3	Natural England, RSPB	D13	NE and the RSPB to provide their latest conclusions on significant cumulative displacement impacts for red-throated	With regard to cumulative red-throated diver (RTD) displacement, we note that the 'like for like' cumulative RTD assessment

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			diver, guillemot and razorbill.	<p>undertaken by the Applicant in REP2-035 using the SeaMAST dataset did not include Hornsea Project Three and Hornsea Project Four as the SeaMAST data did not yield density estimates for these projects. Therefore, the cumulative assessment for RTD is not subject to consideration of the most appropriate figures to include for Hornsea Project Three or to the uncertainty associated with the Hornsea Project Four figures coming from the PEIR for the project. As a result our advice remains that a significant adverse impact (i.e. moderate adverse or above) cannot be ruled out for cumulative displacement for RTD irrespective of inclusion of Hornsea Project Three or Hornsea Project Four.</p> <p>With regard to cumulative guillemot and razorbill displacement, we are still in the process of considering the information in the SoS's 'minded to approve' letter and draft HRA regarding Hornsea Project Three and hence the most appropriate figures to include for this project in the cumulative assessments.</p> <p>We note that as the Thanet Extension was not consented the contributions of this project to the cumulative displacement</p>

	Respondent:	Deadline for Response:	Question:	Natural England response:
				<p>totals for these species should be removed from the totals. However, whilst the appropriate figures to include for the Hornsea Project Three contribution to these totals are not yet established, we note that these will most likely be greater than those from Thanet Extension. Therefore, as we previously concluded in REP4-040 that a significant adverse impact (i.e. moderate adverse or above) could not be ruled out for cumulative displacement for guillemot and razorbill irrespective of whether Hornsea Project Three was included or not and given the above, we consider that as the cumulative totals will most likely increase with the inclusion of Hornsea Project Three and removal of Thanet Extension from those considered at REP4-040, it follows that our advice will most likely remain the same; i.e. that a significant adverse impact cannot be ruled out for cumulative displacement of guillemot and razorbill when Boreas is considered cumulatively with other plans and projects at the EIA scale.</p>
R17.1.4	Natural England, RSPB	D13	NE and the RSPB to provide their latest conclusions on significant cumulative collision impacts for herring gull, lesser black-backed gull, kittiwake and great	We are still in the process of considering the information in the SoS 'minded to approve' letter and draft HRA regarding Hornsea Project Three and hence the most

	Respondent:	Deadline for Response:	Question:	Natural England response:
			black-backed gull.	<p>appropriate figures to include for this project in the cumulative assessments.</p> <p>We note that as the Thanet Extension was not consented the contributions of this project to the cumulative displacement totals for these species should be removed from the totals. However, whilst the appropriate figures to include for the Hornsea Project Three contribution to these totals are not yet agreed, we note that these will most likely be greater than those from Thanet Extension. We previously concluded in REP7-047 (which included updated figures for Vanguard and Boreas based on the revised WCS for these projects of 14.7MW turbines with a 30m draught height) that a significant adverse impact (i.e. moderate adverse or above) could not be ruled out for cumulative collisions for kittiwake and great black-backed gull irrespective of whether Hornsea Project Three was included or not. Therefore given the above, we consider that as the cumulative totals will most likely increase with the inclusion of Hornsea Project Three and removal of Thanet Extension from those considered at REP7-047, it follows that our advice will most likely remain the same; i.e. that a</p>

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				<p>significant adverse impact cannot be ruled out for cumulative collision of kittiwake and great black-backed gull when Boreas is considered cumulatively with other plans and projects at the EIA scale. We also again note, that our advice that a significant adverse impact cannot be ruled of for cumulative collisions of great black-backed gull at EIA scale has been made since East Anglia Three and further predicted collisions of this species will have been added to the cumulative total presented at this project examination since from a further 5 projects located in English waters (Hornsea Project Three, Norfolk Vanguard, Norfolk Boreas, East Anglia One North and East Anglia Two).</p> <p>With regard to lesser black-backed gull and herring gull cumulative collisions, we previously concluded in REP7-047 no significant (i.e. minor adverse) impact from cumulative collisions if Hornsea Project Three was excluded from the totals. As we are still in the process of considering the information in the SoS 'minded to approve' letter and draft HRA regarding Hornsea Project Three and hence the most appropriate figures to include for this project in the cumulative assessments, we</p>

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				currently are not in a position to provide a definitive update on our advice on our conclusions for these two species when Hornsea Project Three is included in the cumulative totals. Initial consideration of the collision predictions from Hornsea Project Three based on the data submitted during the examination phase of the project and based on our preferred input parameters (as presented in our Deadline 7 response during the Hornsea Project Three examination ¹) suggests that the predicted collision totals for these species are not of a scale to significantly increase the likelihood of significant effects (lesser black-backed gull: 17, range: 4-44; herring gull: 9, range 1-23). However, we reserve the right to update this advice following our full consideration of the Hornsea Project Three SoS letter.
R17.1.5	Natural England, RSPB	D13	NE and the RSPB to provide their latest conclusions on combined effects of collision and displacement for cumulative projects for gannet.	We are still in the process of considering the information in the SoS 'minded to approve' letter and draft HRA regarding Hornsea Project Three and hence the most

¹ Natural England (2019) Hornsea Project Three Offshore Wind Farm, Written Submission for Deadline 7: Annex E – Offshore Ornithology Comments for Deadline 7, including information requested by ExA question F2.26. Available from: <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010080/EN010080-001892-Natural%20England%20-%20Annex%20E%20-%20Ornithology%20Response.pdf>

	Respondent:	Deadline for Response:	Question:	Natural England response:
				<p>appropriate figures to include for this project in the cumulative assessments.</p> <p>We note that as the Thanet Extension was not consented the contributions of this project to the cumulative displacement totals for these species should be removed from the totals. However, whilst the appropriate figures to include for the Hornsea Project Three contribution to these totals are not yet agreed, we note that these will most likely be greater than those from Thanet Extension. We previously concluded in REP4-040 that a significant adverse impact (i.e. moderate adverse or above) could not be ruled out for cumulative collision plus displacement combined for gannet irrespective of whether Hornsea Project Three was included or not. Therefore given the above, we consider that as the cumulative totals will most likely increase with the inclusion of Hornsea Project Three and removal of Thanet Extension from those considered at REP4-040, it follows that our advice will most likely remain the same; i.e. that a significant adverse impact cannot be ruled out for cumulative collision plus displacement combined of gannet when Boreas is considered cumulatively with</p>

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				other plans and projects at the EIA scale.
Alde-Ore Estuary SPA				
R17.1.6	Natural England	D13	NE to provide its latest conclusions on no AEOI for lesser black-backed gull population from in-combination collision effects.	Our advice at REP7-047 included updated collision predictions for both Norfolk Vanguard and Norfolk Boreas based on the revised WCSs for both these projects (based on 14.7MW turbines with 30m draught height, as submitted by Vanguard post examination ² and the WCS the SoS decision is based on; and as submitted by Boreas during the examination in REP5-059). Additionally, no lesser black-backed gull (LBBG) collisions were apportioned to the Alde-Ore Estuary SPA from Hornsea Project Three or Hornsea Project Four (which we have agreed with). Therefore, as no further information has been submitted by the Applicant on this matter, the in-combination predicted collision total remains at 54 LBBGs from this SPA using Natural England's preferred apportionment rates for Vanguard and Boreas (or 53 using the Applicant's preferred rates). No further updates have been undertaken to the Alde-

² Norfolk Vanguard Limited (2020) Norfolk Vanguard Offshore Wind Farm: Additional Mitigation – Appendix 1: Updated Collision Risk Modelling. Available from: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010079/EN010079-004215-ExA;%20Mit;%2011.D10.2.App1%20Additional%20Mitigation%20Appendix%201%20Updated%20Collision%20Risk%20Modelling.pdf>

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				<p>Ore Estuary SPA LBBG PVA and so the outputs and consideration of these remain as that set out in our Deadline 7 response (REP7-047).</p> <p>The Norfolk Boreas project contributes 2 (range 0.4-5) birds to this total. This contribution is an estimation which is underpinned by a number of assumptions, several of which have considerable uncertainty associated with them. Accordingly, Natural England advises that a range-based approach is taken to considering impacts.</p> <p>As set out in REP7-047, the Conservation Objective for the LBBG population of the Alde-Ore Estuary SPA is to restore the size of the breeding population to a level which is above 14,074 whilst avoiding deterioration from its current level as indicated by the latest mean peak count or equivalent. Whilst Natural England does not consider an adverse effect on integrity (AEoI) of the LBBG feature of the Alde-Ore Estuary SPA from collision mortality from the Norfolk Boreas project alone, the project does make a contribution (mean predicted value of 2 collisions) to the overall in-combination total of 54 collisions</p>

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				<p>(i.e. 4% contribution).</p> <p>As noted in REP4-040 and REP7-047, there is no evidence to suggest that the future population trend for the colony will be significantly different from the current trend, which is most likely to be stable, in which case there is a risk that the population could decline due to predicted mortality levels. Furthermore, given that the population is likely to be hindered from restoration to target levels even when more optimistic assumptions about the population trend of the colony are made, Natural England again also considers that it is not possible to rule out AEOI from in-combination collision mortality even if the population starts to show modest growth. Therefore, our advice remains that as this feature has a restore conservation objective, and because there are indications that the population might even decline from current levels, we continue to advise that we cannot rule out AEOI of Alde-Ore Estuary SPA through impacts to LBBG, in-combination with other plans and/or projects (see REP9-045) and the Norfolk Boreas project does make a contribution to this in-combination impact.</p>

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Flamborough and Filey Coast SPA				
R17.1.7	Natural England	D13	NE to provide its latest conclusions on no AEoI for razorbill and guillemot populations from in-combination displacement effects.	We are still in the process of considering the information in the SoS's 'minded to approve' letter and draft HRA regarding Hornsea Project Three and hence the most appropriate figures to include for this project in the in-combination displacement assessments for FFC SPA guillemot and razorbill. Therefore, we are currently not in a position to provide a definitive update on our advice on these matters.
R17.1.8	Natural England	D13	NE to provide its latest conclusions on no AEoI for kittiwake, populations from in-combination collision effects.	<p>We are still in the process of considering the information in the SoS's 'minded to approve' letter and draft HRA regarding Hornsea Project Three and hence the most appropriate figures to include for this project in the in-combination assessments. There is some uncertainty on which figures the SoS has used within their Hornsea Project Three considerations. Until we have these figures clarified Natural England cannot comment further. Therefore, we are not in a position to provide a definitive update to our position.</p> <p>We note that as the Thanet Extension was not consented the contributions of this project to the in-combination collision total</p>

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				<p>for FFC SPA kittiwake should be removed from the total. However, whilst the appropriate figure to include for the Hornsea Project Three contribution to the total are not yet agreed, we note that this will most likely be greater than that from Thanet Extension.</p> <p>The Norfolk Boreas project contributes 14 (range 4-28) birds to the in-combination total. Regarding the scale of the contribution of Norfolk Boreas to the in-combination collision total, Boreas contributes 14 kittiwakes to an in-combination total of 361 birds (i.e. 3.9%) when Thanet Extension is removed and excluding Hornsea Project Three and Four given the current scale of uncertainty regarding the most appropriate figure to include for Hornsea Project Three and the inevitable uncertainty with the Hornsea Project Four figure. This contribution from Norfolk Boreas is an estimation which is underpinned by a number of assumptions, several of which have considerable uncertainty associated with them. Accordingly, Natural England advises that a range-based approach is taken to considering impacts.</p>

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				<p>We previously advised in REP9-045 and REP9-049 (which considered the updated figures for Norfolk Vanguard and Norfolk Boreas based on the revised WCS for these projects of 14.7MW turbines with a 30m draught height) that we cannot rule out AEOI of the FFC SPA through impacts to the kittiwake feature in-combination with other plans and/or projects. Therefore given the above, we consider that as the in-combination total will most likely increase with the inclusion of Hornsea Project Three and removal of Thanet Extension from that considered at Deadline 9 (REP9-045 and REP9-049), it follows that our advice will remain the same; i.e. that we cannot be certain that there will be no AEOI of the FFC SPA through impacts to the kittiwake feature in-combination with other plans and/or projects.</p> <p>We highlight that the in-combination total of collision mortality across consented plans/projects had already exceeded levels which were considered to be of an AEOI to kittiwake at FFC SPA – we have concluded that an AEOI cannot be ruled out since the Hornsea Project Two examination. Therefore, any additional mortality arising from these proposals would be considered</p>

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				<p>adverse. We note that further predicted collisions of this feature of the SPA will have been added to the in-combination total presented at the Hornsea Project Two examination since from a further 5 projects located in English waters (Hornsea Project Three, Norfolk Vanguard, Norfolk Boreas, East Anglia One North and East Anglia Two) – the Norfolk Boreas project does make a meaningful added contribution (3.9%) to this in-combination impact.</p> <p>Additionally, we note that FFC SPA kittiwakes have a relatively large foraging range and this makes it particularly prone to in-combination effects ‘stacking up’, as birds will be fairly widely distributed in the breeding season. This means birds from the FFC SPA colony will be interacting with a substantial proportion of the southern North Sea offshore wind farms in the breeding season, and with the majority of North Sea projects in the non-breeding periods. Hence there is an associated risk that in ruling out AEOI on the basis that individual projects have a minor contribution to the in-combination collision total, that total, which has already reached a level where adverse effects could arise, will only increase. Furthermore, as that in-</p>

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				combination total continues to increase with additional offshore wind farm projects consented in the North Sea, the percentage contribution of individual projects to that increasing total will tend to decrease, which could lead to further decisions being made on the basis of individual projects having minor contributions. This risks the impacts on the SPA becoming an example of 'death by a thousand cuts'.
R17.1.9	Natural England	D13	NE to provide its latest conclusions on no AEOI for gannet populations from in-combination displacement and collision effects.	We are still in the process of considering the information in the SoS's 'minded to approve' letter and draft HRA regarding Hornsea Project Three and hence the most appropriate figures to include for this project in the in-combination collision plus displacement assessments for FFC SPA gannet. Therefore, we are currently not in a position to provide a definitive update on our advice on these matters.
R17.1.10	Natural England	D13	NE to provide its latest conclusions on no AEOI for the assemblage at Flamborough and Filey Coast SPA on the basis of displacement or collision impacts for the project in-combination.	We are still in the process of considering the information in the SoS's 'minded to approve' letter and draft HRA regarding Hornsea Project Three and hence the most appropriate figures to include for this project in the in-combination displacement or collision assessments for the assemblage feature of the FFC SPA. Therefore, we are

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				currently not in a position to provide a definitive update on our advice on these matters.
Compensatory Measures				
R17.1.13	Natural England	D13	What compensatory measures does NE consider suitable to deliver for lesser black-backed gull?	Please see Natural England's letter submitted to the SoS on 27 th April 2020 in relation to Norfolk Vanguard and Natural England's role and remit in relation to compensation ³ (as provided to Vattenfall on 19 th December 2019) and our advice in relation to the proposed compensation measures suggested by Norfolk Boreas provided at Deadline 9 (REP9-047).
R17.1.15	Natural England	D13	What compensatory measures does NE consider suitable to deliver for kittiwake?	Please see Natural England's letter submitted to the SoS on 27 th April 2020 in relation to Norfolk Vanguard and Natural England's role and remit in relation to compensation ⁴ (as provided to Vattenfall on 19 th December 2019) and our advice in relation to the proposed compensation

³ Natural England (2020) Norfolk Vanguard – Applicant's submission to Secretary of State Consultation Request for further information. Available from: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010079/EN010079-004262-Natural%20England%20-%20Comments%20on%20Responses.pdf>

⁴ Natural England (2020) Norfolk Vanguard – Applicant's submission to Secretary of State Consultation Request for further information. Available from: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010079/EN010079-004262-Natural%20England%20-%20Comments%20on%20Responses.pdf>

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				measures suggested by Norfolk Boreas provided at Deadline 9 (REP9-047).
R17.1.17	Applicant, Natural England	D13	Updates The Applicant and NE to detail any further updates on agreement to or requirements for compensatory measures.	There have been no further discussions in this regard as Natural England is currently considering the outcomes of the Hornsea Project Three and Norfolk Vanguard decisions.
Haisborough Hammond and Winterton SAC				
R17.1.18	Natural England	D13	Cable Protection: NE to clarify the statement in the SoCG [REP10-038, p13] that while it does not agree to no AEoI, it acknowledges that mitigation would significantly reduce the risk of an AEoI. Can NE, therefore, confirm whether or not there is no AEoI after agreed mitigation?	Natural England advises that an AEoI cannot be ruled out due to the uncertainties / scientific doubt in the proposed measures to avoid, reduce and mitigate the impacts to an acceptable level and achieve the desired outcomes.
R17.1.19	Natural England	D13	Is NE content with the detail in the In Principle Monitoring Plan on pre- and post-construction surveys? If not, what additional details does it consider needs adding?	Natural England notes that the Applicant has adopted all of the points we raised on the IPMP and therefore has no further comments.
R17.1.22	Natural England	D13	Sandbank features: NE to detail any remaining concerns that the Applicant's measures for promoting recovery of sandbanks [REP10-038, p83]	Please see Natural England's advice provided at Deadline 9 in relation to impacts from the placement of cable protection and comments in the risks and

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			would change the sediment composition of the seabed. If it does have concerns, what additional measures does NE consider would be necessary?	issues log provided at Deadline 12 in relation to disposal of Sandwave levelling sediment.
R17.1.24	Natural England, Applicant	D13	<p>a) NE expresses concern in [REP9-039, p4] that there is no evidence presented that a 30-year temporary cable protection would have no impact on site conservation objectives. Does NE still have these concerns? b) If so, how would the Applicant address these?</p> <p>c) What evidence can the Applicant present about the likely effects of cable protection being in place for 30 years?</p>	<p>a) Yes these concerns remain unchanged.</p> <p>b) Natural England acknowledges that the Applicant has addressed this concern as much as possible by reducing the total amount of cable protection. However, this reduction does not remove the issue and therefore it is our advice that an AEoI cannot be ruled out</p> <p>c) The issue is that this industry is in its infancy and therefore parallels can only be drawn from other industry where monitoring is limited and we have not seen the outputs. Thus the evidence available is limited. If the Applicant could provide examples of cable protection that has been deployed for lengths of time, then decommissioned, with monitoring before and after then we would review and provide further comment. However, we are not aware of any evidence of sufficient quality. Therefore Natural England's advice remains unchanged that a precautionary approach should be taken.</p>
R17.1.25	Natural	D13	In the light of the SoS decision on Norfolk	Our advice remains unchanged to that

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	England, Marine Management Office		Vanguard, what is NE's and MMO's final conclusion regarding the appropriateness of both the SIP and CSIMP for undertaking appropriate assessment and addressing uncertainties related to cable laying?	already submitted at Deadline 4 (REP4-041) and Deadline 9 (REP9-039).
	South North Sea SAC			
R17.1.28	NE, MMO	D13	If NE and MMO still consider that it is not appropriate to equate the use of the SIP process to its use in the SNS SAC, in relation to the disturbance of marine mammals, what do they consider to be an appropriate process?	<p>As advised in our Relevant Representations, Natural England remain content with the use of a Site Integrity Plan (SIP) to manage disturbance impacts from underwater noise on the Southern North Sea (SNS) SAC. However, we note that we are still awaiting the regulators group to provide a mechanism for the control of in-combination noise impacts.</p> <p>For clarity, Natural England would note that we have not questioned the appropriateness of a SIP for the SNS SAC, however, we have questioned the use of a SIP in the Haisborough, Hammond and Winterton SAC.</p>