

FAO Gareth Leigh
Head of Energy Infrastructure Planning
Department for Business Energy and Industrial
Strategy
Level 3, Orchard 2
1 Victoria Street
London
SW1H 0ET
By email only:
NorfolkBoreas@planninginspectorate.gov.uk

Vattenfall Windpower Ltd
Norfolk Boreas Ltd
5th Floor
70 St Mary Axe
London
EC3A 8BE
Tel: 0800 019 3517
info@norfolkboreas.co.uk

25 June 2021

Norfolk Boreas Request for Further Information

Dear Mr Leigh,

Planning Act 2008 and the Infrastructure Planning (Examination Procedure) Rules 2010

Application by Norfolk Boreas Limited for development consent for Norfolk Boreas Wind Farm (Norfolk Boreas) Response to request for information dated 28 April 2021 Norfolk Boreas Limited ("the Applicant")

We refer to your letter dated 28 April 2021 which seeks further information in relation to the application seeking development consent for the Norfolk Boreas Offshore Wind Farm.

This following documents are enclosed with the Applicant's submission:

1. Applicant's Response to the Request for Further Information
2. 3.3 Note on Requirements and Conditions in the Development Consent Order (Version 6)
3. 8.24 In Principle Habitats Regulations Derogation Provision of Evidence Appendix 2 Alde-Ore Estuary SPA In Principle Compensation
4. 8.25 In Principle Habitats Regulations Derogation, Provision of Evidence Appendix 3 Haisborough, Hammond and Winterton SAC In Principle Compensation
8.26 In Principle Habitats Regulations Derogation Provision of Evidence Appendix 1 Flamborough and Filey Coast SPA In Principle Compensation
5. Onshore Project Substation Masterplan

The Applicant has taken significant steps to mitigate impacts in order to avoid adverse effect on integrity of European sites. However, following the close of the examination, and without prejudice to the Applicant's firm position that there is no adverse effect on integrity of any European site as a result of the project, the Applicant has continued to proactively develop the in-principle compensation plans in the event that the Secretary of State considers that it is necessary to secure these.

Significant levels of engagement have been undertaken with relevant statutory consultees to inform the content of the in-principle plans, which now contain considerable detail on the compensation options available, the compensation measures which the Applicant recommends

developing further, the feasibility of the recommended compensation measures including how they would be delivered and timescales for their delivery, as well as the costs associated with their delivery and any ongoing monitoring and management proposals.

Agreement in principle has been reached with relevant statutory consultees on the most appropriate compensation measures to be taken forward (if any) for the Flamborough and Filey Coast Special Protection Area and the Alde-Ore Estuary Special Protection Area. Whilst it has not been possible to reach a clear consensus on the most appropriate compensation measure to be taken forward (if any) in relation to the Haisborough, Hammond and Winterton Special Area of Conservation (HHW SAC), the Applicant has recommended two compensation options to be developed further, one of which is to remove anthropogenic material from the seabed including marine debris and/or redundant infrastructure. BT and Helix Well Ops Ltd have confirmed in principle support to the Applicant for removing their out of service infrastructure. Letters demonstrating this are provided in the Applicant's detailed response.

Within the letter from BT it is also confirmed that the Applicant is seeking agreement with BT and associated consortia to cut the final out of service telecommunications cable in the HHW SAC. This would allow the Applicant to further reduce the amount of cable protection required. This agreement is at a very advanced stage and the Applicant expects it to be signed imminently. In addition, the Applicant is increasingly confident of the very low likelihood that cable protection will, in fact, be required at all within the HHW SAC (apart from at cable crossings). Further evidence in relation to this, from prospective export cable suppliers, has been submitted in the Applicant's detailed response.

Given that it will not be known whether cable protection is required until the point that the export cable has been installed, the Applicant considers it to be wholly disproportionate to require compensation to be delivered in advance of cable installation. To do so, would require the Applicant to deliver, in advance, compensation which may then never be required. This would unnecessarily delay the delivery of the project in the face of the urgent need for deployment of renewable energy to meet the Government's ambitions for net zero and 40GW by 2030, and unnecessarily (and potentially significantly) increase the costs of the project's delivery and therefore ultimately the cost of energy for consumers.

In addition, should it be concluded that compensation is required for the HHW SAC, certain mitigation currently secured in the DCO should no longer be required. In particular, and as agreed with Natural England, it would not be reasonable to require the Applicant to decommission cable protection in the HHW SAC having also required compensation for its permanent impact, nor would it be necessary to secure a Site Integrity Plan.

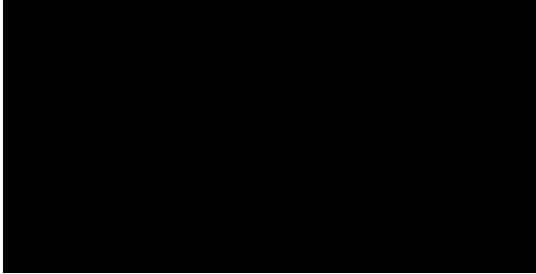
Whilst the Applicant has developed the in-principle plans in considerable detail, the Applicant is firmly of the view that compensation measures should not be required in this particular case. Following significant steps taken to mitigate impacts in order to avoid adverse effects on integrity, any remaining impacts are extremely small and can properly be regarded as de minimis. Notwithstanding this, the Applicant will continue to develop the in-principle plans proactively, in consultation with statutory consultees, pending the determination of the Application.

The Applicant is committed to minimising impacts as a result of the project and has also included significant mitigation to minimise cumulative impacts. Nonetheless to ensure that the Applicant's commitment to minimise cumulative landscape and visual impacts at the onshore project substation is secured, the Applicant also proposes a new requirement to require that the onshore project substations for both Norfolk Vanguard and Norfolk Boreas are developed in accordance with an overarching masterplan. As well as zoning information, the masterplan contains clear

principles to ensure that development of both onshore project substations is co-ordinated and considered holistically.

We trust the enclosed documents deal fully with your request for further information. If however, any further clarification is required, please do not hesitate to contact us.

Yours faithfully



Jake Laws

For and on behalf of

Norfolk Boreas Limited

