

Date: 26 May 2023
Our ref: 10570 10430: 435548
Your ref: Norfolk Projects Offshore Wind Farms BIMP



Hornbeam House
Crewe Business
Park Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY

Dear Sir/Madam

**Norfolk Projects Offshore Wind Farms Benthic Implementation and Monitoring Plan (BIMP).
Norfolk Vanguard and Norfolk Boreas offshore wind farms (collectively known as The Norfolk
Projects)**

Thank you for consulting Natural England on 04 May 2023 on the proposed Norfolk Boreas/Vanguard Offshore windfarm benthic compensation measures included with Benthic Implementation and Monitoring Plan (BIMP) and associated documents.

In providing this response we have reviewed the following documents:

- Benthic Implementation and Monitoring Plan
(Document Reference: PB5640.009.0006)
- Annex 2 Benthic Compensation Consultation Report
(Document Reference: PB5640.009.0007)
- Annex 3 Marine Debris Search Area Identification Desk Study
(Document Reference PB5640.008.0075)

Natural England provides no comment on the Funding statement (Document Reference: PB5640.009.0062) and Annex 4 Further Information to Support Education, Awareness and Facilities to Limit Further Marine Debris (Document Reference: PB5640.009.0006).

Summary

As indicated by the Consultation Report, Natural England believes that the BIMP has adopted an appropriate approach to deliver what is required by the Development Consent Order (DCO), whilst managing down environmental impacts in doing so. However, Natural England's (and the other SNCBs) advice on Marine Debris removal and Marine Awareness Campaign's being insufficient to compensate for the predicted lasting habitat change/loss from the placement of cable protection remains unchanged from that submitted to the Secretary of State for Hornsea Project Three (HP3) ([21 January 2022](#)).

Subsequent, to provision of Natural England's statutory advice to the Secretary of State for HP3, the results of the Hornsea Project Three Benthic Compensation, Marine Debris Removal Campaign has affirmed our position on the inadequacy of debris removal as a compensation measure; the results of which are included within the recently circulated 'Summary Report' (March 2023).

With the HP3 results demonstrating that there is a high probability that there will be insufficient marine

debris to meet the Norfolk Projects DCO requirements, we welcome Vattenfall's approach to thoroughly considering potential adaptive management measures. We advise that, whilst we recognise that adaptive management which includes the removal of marine debris in another sites reflects the Norfolk Projects DCO requirements, it is our view that this will also be ineffective in meeting the compensation requirements based on debris removal campaigns in other Southern North Sea Marine Protected Areas (MPAs).

We also recognise that the options for delivering project level compensation are currently constrained by factors outside of Vattenfall's control and therefore exploring strategic compensation is the next logical step. But again, strategic options are not yet readily available and are unlikely to have any certainty on deliverables before Autumn 2023, which does not align with the projects' final investment decision (FID).

In acknowledgement of overriding public interest in the rapid progression of green energy as set out in the British energy security strategy (BESS) and the unique set of circumstances the Norfolk project find themselves in; Natural England suggests that compensation measures with ecological merit proposed within the Norfolk Vanguard and Boreas examinations are revisited.

Main Comments

1) Hornsea Project Three Benthic Compensation, Marine Debris Removal Campaign Summary Report

Recently, Ørsted have helpfully shared the Hornsea Project Three Benthic Compensation, Marine Debris Removal Campaign Summary report with the Steering Group for that project. Within the report it is highlighted that;

- 31 items of debris were removed in total from two locations in The Wash and North Norfolk Coast and North Norfolk (WNNC SAC) Sandbanks and Saturn Reef (NNSSR SAC)
- This equated to 3.7 items per 100ha in WNNC SAC and 2.1 Items per 100ha in NNSSR SAC
- Most of the items found within WNNC SAC were related to static fishing activities, but within NNSSR SAC there was a higher proportion of debris associated with more mobile fishing and shipping
- No correlation between sediment type and debris was found
- The area of seabed 'recovery' post debris removal was measured to be 18.6m² in WNNC SAC and 95.3m² in NNSSR SAC. This is 0.07% and 0.02% respectively of predicted area of habitat loss/change.
- Despite considerable desk based work and geophysical survey prior to deployment - adaptive management was triggered for both designated sites as insufficient debris was located in the original areas of searches.
- In total, the Area of Search (AoS) within WNNC SAC was 450ha some 150X greater than the predicted area of impact. And the AoS for NNSSR SAC was 118ha which is 25X greater than the predicted area of impact.

From the report findings we agree with Ørsted that there was a high effort to effectiveness ratio. We have estimated that the effort is likely to also outweigh the environmental benefit of debris removal due to the CO₂ footprint from the campaign. We also agree with Ørsted that there is support for a higher ratio than 1:1 for benthic compensation. We would therefore welcome lessons learnt from the Hornsea Project Three debris removal campaign being reflected in any decision making relating to the Norfolk Projects BIMP.

2) Consultation report

For clarity, Natural England has sought to engage with the benthic steering group for the Norfolk Projects as usefully as we could to manage down any potential environmental impacts from a debris removal campaign. Because we could not endorse wider steering group discussions relating to the DCO compensation requirements, we attended those meetings focused on the draft BIMP.

3) Adaptive management

With the HP3 results demonstrating that there is a high probability that there will be insufficient marine debris to meet the Norfolk Projects DCO requirements and strategic compensation options (including the Marine Recovery Fund) not yet being readily available; we have encouraged the Developer to discuss with DEFRA the potential to revisit project level compensation options.

For clarity, Natural England advised during the Norfolk Boreas and Norfolk Vanguard examination that there are project level compensation measures for the Norfolk projects which we believe still have ecological merit, but contrary to the 'Consultation Report' we are not endorsing one particular measure.

Please find attached the link to Natural England's most recent advice provided for Boreas and Vanguard during examinations on the potential compensation measures:

[EN010087-002852-EN010087 351731 Norfolk Boreas Annex 1 Natrual England advice on HHW SAC in principle compensation measures final.pdf \(planninginspectorate.gov.uk\)](#)
[Page 5 onwards is the most relevant]

The same advice is also provided for Vanguard at:

[EN010079-004446-EN010079 374820 Norfolk Vanguard Annex 1 NE advice on HHW SAC in principle compensation measures.pdf \(planninginspectorate.gov.uk\)](#)

Yours sincerely

Zara Ziauddin
Marine Lead Adviser - Major Casework
East Midlands Team
Southern North Sea
Natural England

Telephone: [REDACTED]

Email: [REDACTED]