

## THE PLANNING ACT 2008

## THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES $2010\,$

Natural England's Risk and Issues Log - Deadine 1 Submission.

For:

The construction and operation of the Sheringham Shoal Extension and Dudgeon Extension Offshore Wind Farms located approximately 16km and 27km respectively from the Norfolk Coast in the Southern North Sea.

Planning Inspectorate Reference EN010109

20th February 2023

Natural England has created this Risk and Issues Log to track progress through the SEP and DEP examination process.
The Risks and Issues Log will be submitted at each deadline and mark issues with a colour from our RAG scale depending on the level of significance of the issue. It should be noted that the colour scale is different from that used in the Statement of Common Ground provided by The Applicant.

The Risk and Issues Log is split into multiple tabs in line with the Appendices of our Relevant Representations submission.

- B Offshore Ornithology C- Ornithology Compensation
- D Marine Mammals
- E Marine Processes F All Other Marine Matters
- G Cromer MCZ
- H Seascape and Landscape Visual Impact Assessment (SLVIA)
- I Onshore Ecology

The Risk and Issues Log will be submitted alongside our written response at each deadline. This will reflect our position following a review of documents that we have considered in forming our position at

Any issues added to the log during Examination (not included in Relevant Reps) are highlighted in Red in column C and then coded according to RAG status. [New Text is in red]

Risks and Issues have been presented on a document by document basis for all Annexes except Annexes G (Cromer MCZ) and H (SLVIA) which have been presented as a hybrid of broad themes, which may stretch across several documents, and a document by document basis depending on the point(s) being addressed. For all tabs except tabs G and H, the blue header row at the top of each section refers to the document that the comments are addressing. For Tabs G and H, the blue header row either addresses the broadscale theme that cover the comments below with relevant documents referenced within individual comments where appropriate or in the same document by document manner which has been adopted for all other tabs.

Purple	
Note for Examiners and/or competent authority. May relate to DCO/DML	
Red	
Natural England considers that unless these issues are resolved it will have to advise that (in relation to any one of them, and as appropriate) it is not possible to	
ascertain beyond reasonable scientific doubt that the project will not affect the integrity of an SAC/SPA/Ramsar and/or significantly hinder the conservation objectives	
of an MCZ and/or damage or destroy the interest features of a SSSI and/or comply fully with the Environmental Impact Assessment requirements.	
Addressing these concerns may require the following:	
new baseline or survey data; and/or	
significant revisions to baseline characterisation and/or impact modelling and/or	
significant design changes; and/or	
significant mitigation	
In addition, Natural England may use this category to highlight where there is a significant risk that an issue will not be sufficiently addressed within the Examination	
timescales. Consequently, issues that start out as Amber may progress to Red in the latter stages of the examination.	
Amber	
Natural England does not agree with the applicant's position or approach and consider that this could make a material difference to the outcome of the decision-	
making process for this project.	
Natural England considers that these matters <u>may</u> be resolved through:	
provision of additional evidence or justification to support conclusions; and/or	
revisions to impact assessment methodology and/or assessment conclusions; and/or	
minor to moderate revisions to impact modelling; and/or	
well-designed mitigation measures that are adequately secured through the draft DCO/dML and/or	
amendments to draft plans	
If these issues are not addressed or are unlikely to be resolved by the end of the Examination, then they may become a Red risk as set out above.	
Yellow	
Natural England doesn't agree with the Applicant's position or approach. We would ideally have liked this to be addressed prior to the examination but are satisfied	
that for this particular project it is unlikely to make a material difference to our advice or the outcome of the decision-making process and would not expect these	
matters to be a ongoing focus of the examination. However, we reserve the right to revise our opinion should further evidence be presented.	
It should be noted by interested parties that just because these issues/comments are not raised as significant concerns in this instance, it should not be understood or	
inferred that Natural England would be of the same view in other cases or circumstances.	
Once a Risk or Issue has been categorised as yellow, Natural England will not make further comment on the matter at subsequent deadlines, unless specifically	
requested to through ExA Questions. These rows will then be greyed out at subsequent deadlines in order to rationalise the risk and issues log.	
Green	
Natural England is in broad agreement with the Applicant's approach and has no significant outstanding concerns.	
As above, we reserve the right to revise our opinion should new evidence be presented.	
Once a Risk or Issue has been categorised as green, Natural England will not make further comment on the matter at subsequent deadlines, unless specifically	
requested to through ExA Questions. These rows will then be shaded grey at subsequent deadlines in order to rationalise the risk and issues log.	

March   Marc			RAG Status Rel						
Let the control of th		atural England's Relevant Representation		Consultation, actions, progression	RAG status Deadline 2	Consultation, actions, progression	RAG status Deadline 3	Consultation, actions, progression	RAG status Deadline 4
Let the second control of the contro	1 Cer	ertain requirements and conditions do not include a maximum number of turbines per development.							
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The control of the co	req	quirements 12 and 14 should be amalgamated into an outline landscape environmental management strategy (OLEMS).							-
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Because of the control of the contro	6 Ma	arine Licences.							-
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Service of the control of the contro	8 San	ndwich Tern Compensation Steering and the Kittiwake Compensation Steering Groups prior to submission. Natural England advises these							
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The contract of the contract o	12 Cur	urrently adopted approach to assessing displacement during construction.							1
Company   Comp	15 Infli	fluence of Highly Pathogenic Avian Influenza (HPAI) on calculated existing pressures in the environment and on data used to calculate the							
Procedure   Proc	pendix C - Offshore	Ornithology Compensation			I		<u> </u>	I I	
Descriptions of the control of the c	16 Eng	igland disagrees with the use of pontoons over islands and that the intervention at the Farne Islands SPA will deliver meaningful							
By Comment of the part of the	18 Cor	ompensatory measures for Guillemot and Razorbill are relatively undeveloped and require further detail.							
But The Control of th	19 Cur	rrently presented mitigation measures for disturbance within the Marine Mammal Mitigation Protocol (MMMP) and the Site Integrity							
Execution of control and the second spiral recognition of control recognition of the control and the control a	20 Nat	atural England does not agree with the in-combination assessment of impacts to the populations of seals within the Wash and North					L		
Section 1.	The	ie vessel code of conduct is a key mitigation measure designed to protect marine mammals at important sites. This code of conduct should							
The contract season is an extra contract and contract are contracted and contract a	dev	evelopment							-
Service Memory and all an experimental control and con	23 Fun	orther information is needed to demonstrate that an AEoI will not occur on the grey seal feature of the Humber Estuary SAC.							<u> </u>
The property of the Control of the C	24 Fun	orther information should be provided in relation to sandbanks/waves, sediment deposition, sediment transport, and suspended							
Sequence with the large for the many and produced to the root through the control and the cont	Onl	nly the Cromer Shoal Chalk Bed (CSCB) MCZ has been identified as a receptor, no other MPAs have been included. All MPAs within the ZoI							
Services and the control of the cont	to a	agree with the likely significant effect (LSE) conclusions for Inner Dowsing, Race Bank and North Ridge SAC and The Wash and North							
Overland providing content and water of an an anticomorphism devices and providing of an anticomorphism devic			1						
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New York or Can a processory recount the Commonweal Control Co	pre								+
Appeals Country and MEZ    Section of the Country o		rveys, such as those protected under Annex 1 and UK priority habitats identified under Section 41 of the NERC, 2006 Act also includes nex I stony reef as a precautionary measure. This commitment needs to be secured through condition within the DCO/DML.							
district concentration (price for Col M.C.)  13 Online of the price of	29 Nat pendix G - Cromer S	atural England seeks clarification as to status of the UK BAP 'Peat and clay exposures with piddocks' at Transect SS 21A.  Shoal MCZ							
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In order to fully discharge registery dates series accorded [1] of the MAAL, 2000, in constraining in all constrained in the MAAL (2000), in constraining in the MAAL (2000),									_
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Statistical England advisors that further clarifications and/or informations regarded to entire that the degradation of the clarification and the clarific	on-	egoing Oil and Gas impacts will result in lasting habitat change / physical disturbance which will further hinder the conservation objectives							
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splants the placement of clution and recentation of an optice bed in the model and a model sould not be lose to exclude with the company of t	of s	subcropping chalk.							<u> </u>
course soldment as, in the centre of the 1's shaped mixed soldment are on north/coult of the blank retargle.  36 In all fights of highlights north mixed to the soldment of the soldment of the project in the soldment of the soldment of the project in the soldment of the soldm	aga aga	ainst the placement of clutch and restoration of an oyster bed in the middle of a mixed sediment area. For this to be considered as							
pare reader than predictioned or unforceases.    The Turbines of 25F, in particular, are too big and too close to the coastine of the brinders of 25F, in particular, are too big and too close to the coastine of the brinders of 25F, in particular, are too big and too close to the coastine of the brinders of 25F, in particular, are too big and too close to the coastine of the brinders of 25F, in particular, are too big and too close to the coastine of the brinders of 25F, in particular, and the coastine of the brinders of 25F, in particular, and the coastine of the brinders of 25F, in particular, and the coastine of 25F, in particular, and	coa Nat	arse sediment e.g. In the centre of the 'c' shaped mixed sediment area or north/south of the blue rectangle. atural England highlights the need for the implementation of adaptive management measures should monitoring demonstrate the impacts							-
(MCAONS), Natural Engined consider that the effects of SFP and DFP on the standary purpose of the MCAONS (significant Adverse effect. The key test is the ecoglishibity of them to the statutory purpose of the MCAONS, designation already compromised by the ecitient QNMF.  By a presentation IVC, will write degrade the quality of views out to sea. Their presence, and in particular the contrast in side between the presence constitute.  Turbress located in the view of the presence of the most of the state of the	are pendix H - Seascape	e greater than predicted or unforeseen. e and Landscape Visual Impact Assessment (SLVIA) - 'Offshore' elements of the project						I.	
compromised by the existing OWFs.  38 Ps a presented in Victor 2, will further degrade the quality of views out to sea. Their presence, and in particular the contrast in size between existing and proposed turbines, will lead to a further loss of the sense of wilderness and tranquillity which is still a special quality of the NACANS. Have the apparent height of the turbines is the prime cause of significant aboves effects on the natural beauty quality of the NACANS. Have the apparent height of the turbines is the prime cause of significant aboves effects on the natural beauty quality of the NACANS. Have the apparent height of the turbines is the prime cause of significant aboves effects on the natural beauty quality of the NACANS. Have the apparent height of the turbines is the prime cause of significant aboves effects on the natural beauty quality of the NACANS. Have the apparent height of the funds on the significant above and through the causality of the NACANS. Have the apparent height of the such that the operation of the causality of the natural beauty and the provinces of the sense of the significant above and through the causality of the natural beauty and the significant of the impacts will be recited during the construction places, on the significant of the impacts will be recited during the construction places, on the significant during the construction places, on the significant places and through the significant places. Assume the significant places are significant places and the significant places are significant places. Assume the significant places are significant places are significant places. Assume the significant places are	27 (NC	ICAONB). Natural England consider that the effects of SEP and DEP on the statutory purpose of the NCAONB is a Likely Significant Adverse							
remote coastinie.  Turbines located in the southern portion of DEP under WCS2 would result in significant adverse effects on the natural beauty quality of the WCADNB. Here the apparent height of the turbines is the prime cause of significant adverse effects. Abhough the geographical enter of these effects covers a smaller area that those of the 59 receives the transportance for the coastine effected.  40 From our experience of previous NSIP examinations, it is unlikely that an agreement between Natural England and the Applicant on the igentificance of the impacts will be resided during the examination proces. We are likely to agree to differ in our views.  Appendix 1- Indexport Assessment (VENA)—Traverstrial aspects the project.  41 Natural England Agrees with the Applicant that direct adverse effects will occur during the construction phase. During the operational phase, to indicate effects will occur during the construction phase. During the operational phase, to indicate effects will occur during the construction phase. During the operational phase, to indicate effects will occur during the construction phase. During the operational phase, to indicate effects will occur during the construction phase. During the operational phase, to indicate effects will occur during the construction phase. During the operational phase, to indicate effects will occur during the construction phase. During the operational phase, to indicate effects will occur during the construction phase. During the construction phase. During the construction of the construction of the operation phase, to indicate effects will occur during the construction of the operation of	SEP	P, as presented in WCS2, will further degrade the quality of views out to sea. Their presence, and in particular the contrast in size between							-
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44 measures. In addition, further clarity and commitment is required on the level and range of pre-construction surveys that will be carried out and how these will inform future mitigation decisions and undecided crossing point methods.  Habitats Regulasions Assessment, further clarity is required as to why the decision was taken to screen out three of the qualifying features of the River Wearnows. Abc. between the initial screening assessment and the subsequent screening matrices and appropriate assessment given that a potential impact pathway exists.  As A Natural Rightand require the Outline Ecological Management Plan and the Outline Landscape Management Plan to be combined into one		atural England advises that close attention is made to the advice of the NCAONB partnership and the relevant local authorities.  al Ecology			I			I	<u> </u>
44 measures. In addition, further clarity and commitment is required on the level and range of pre-construction surveys that will be carried out and how these will inform future militagation decisions and undecided crossing point methods.  Habitats Regulations Assessment, further clarity is required as to why the decidency was taken to screen out three of the qualifying features of the River Wensum ASA between the initial screening assertment and the subsequent screening matrices and appropriate assessment given that a potential impact pathway exists.  As Natural England require the Outline Ecological Management Plan and the Outline Landscape Management Plan to be combined into one									
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the New Wenoum SAC between the Initial screening assessment and the subsequent screening matrices and appropriate assessment given that a potential impact pathway exists.  As Natural England require the Outline Ecological Management Plan and the Outline Landscape Management Plan to be combined into one									+-
	tha	at a potential impact pathway exists.							
document (Outline Landscape and Ecological Management plan (OLEMS).									-
New at Deadline 1. Natural England (NE) has included an area known as Wensum Woodlands on a list for potential notification as a Site of	No	ew at Deadline 1. Natural England (NE) has included an area known as Wensum Woodlands on a list for notential notification as a Site of							
47 Special Scientific Interest (553) consideration due to the Barbastelle bat colony it contains. Therefore Natural England advises that in order to future proof the project, there must be no damage due to construction or operation and maintenance activities that may hinder controllection future proof the project, there must be no damage due to construction or operation and maintenance activities that may hinder controllection future proof the project, there must be no damage due to construction and maintenance activities that may hinder or controllection future provides a construction of the project of the projec	47 Spe futu	recial Scientific Interest (SSSI) consideration due to the Barbastelle bat colony it contains. Therefore Natural England advises that in order to ture proof the project, there must be no damage due to construction or operation and maintenance activities that may hinder notification							
of the site. Mitigation as highlighted above should be of gold standard given the importance of the site and the presence of Barbastelles.	of t	the site. Mitigation as highlighted above should be of gold standard given the importance of the site and the presence of Barbastelles.							
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A - DCO DML

Point	Point Number(s) from	Taken from Natural England's Relevant and Written Representations SEP and DEP Appendix A - Development Consent Order, Deemed	RAG Status Rel	Consultation, actions, progression	DAG Status D2	Consultation, actions, progression	DAG Status D2	Consultation, actions, progression	RAG Status D4
	Appendix A [RR-063]	Marine Licences and related certified documentation [RR-063]	and WR Rep D1	Consultation, actions, progression	RAG Status D2	Consultation, actions, progression	RAG Status DS	Consultation, actions, progression	RAG Status D4
Document	t Used : [APP-024]	3.1 Development Consent Order  The interpretations have included a definition of the habitats regulations derogation provision of evidence, Annex 2A which outlines							
A1	1	sandwish tern compensation implementation and monitoring plan. There is no issue on the face of this interpretation, however, the Applicant refers to a plan that may alrange during the semaination process as discussions regarding the compensation are onegoing. Therefore, there may be a need to update this definition later. This comment applies to the interpretation related to Annex 3A as well. We advise there is no action needed now, but once dregosition is suste have reached their condusion, this interpretation bould be reviewed.							
		to ensure it remains appropriate.  The following Requirements and conditions do not include a maximum number of turbines per development. Natural England recommends adding additional text to make the limitation on the maximum number of turbines clear.  Schedule 2, Part 1, Requirement 2							
A2	2, 3, 11	Schedule 10, Part 2, Condition 1							
		Comments raised on schedule 10 also apply to Schedules 11, 12 and 13 where similar conditions exist.							
		Natural England advises the text should be amended to include consultation of the relevant SNCB in each of these conditions.  Schedule 10 Part 2 Condition 4: Due to the importance of in-combination and cumulative impacts of the development.							
А3	4, 5, 11	Schedule 10 Part 2 Condition 13 (1): This condition should also include the need to consult the relevant SNCB as appropriate.							
		Comments raised on schedule 10 also apply to Schedules 11, 12 and 13 where similar conditions exist.							
A4	6, 11	There is no mention within Schedule 10 Part 2 Condition 13 of a requirement to microsite cables around identified features of conservation importance. This is a tandard mitigation measure and is normally secured within the requirements at Condition 13 [1] (a). Comments raised on schedule 10 also apply to Schedules 11,12 and 13 where similar conditions exist.							
		Schedule 10 Part 2 Condition 13 (c) (ii) allows for the scour and cable protection plan to be amended after installation. However, Natural England has concerns about the deployment of scour and cable protection across the entire lifetime of the project. We advise the							
A5	7, 11	Applicant amends the condition to make it clear the plan may only be amended and resubmitted to a maximum period of ten years after commencement of operation.  Comments raised on schedule 10 also apply to Schedules 11, 12 and 13 where similar conditions exist.							
46		Natural England does not agree with the requirement for this plan to be submitted 4 months prior to construction. Natural England recommends that the timing is amended to require the Site Implementation Plan (SIP) to be submitted no earlier than 9 months and no							
A6	8, 11	later than 6 months prior to commencement.  Comments raised on schedule 10 also apply to Schedules 11, 12 and 13 where similar conditions exist.							
A7	9, 11	Natural England does not consider 4 months an appropriate timeframe to approve all plans and documentation. Natural England recommends amending the time period to 6 months or adopt a more document specific timing requirement. We are willing to discuss with the Applicant and the MM/O a more document specific timing requirement.							
		Comments raised on schedule 10 also apply to Schedules 11, 12 and 13 where similar conditions exist.  Natural England notes that Schedule 10 Part 2 condition 20 specifies the requirement of monotioning only. This monitoring is required due to uncertainties within the assessment. However, there is no requirement within the condition for the applicant, or regulatory authority,							
		to take action should the monitoring highlight that the impact is significantly in excess of the impact assessed. Consideration should be given to amending the monitoring requirements to make it clear that, if identified impacts are in excess of those assessed, there is a need							
A8	10, 11	to provide a consideration of appropriate action that could be taken.  Comments raised on schedule 10 also apply to Schedules 11, 12 and 13 where similar conditions exist.							
		Comments raised on schedule 10 also apply to schedules 11, 12 and 15 where similar conditions exist.							
		Natural England notes that Schedule 12 Part 2 Condition 19 does not contain a requirement for post construction monitoring of the Cromer Shoals Chalk Bed (CSCB) MCZ. Natural England advises that text should be added to this condition to make it clear the need to							
A9	12, 13	monitor the works within the MCZ are secured. The monitoring condition should also secure the requirement to take appropriate restoration measures or mitigations should the monitoring highlight an impact of concern beyond that predicted in the ES.							
		Comments raised on Schedule 12 also apply to schedule 13 where similar conditions exist.							
		Natural England welcomes the requirements of Schedule 17 Part 1 and 2, conditions 2 and 11 to submit the plan of works to the Sandwich Tern Compensation Steering Group and the Kittiwake Compensation Steering Group. We are however concerned that there is no requirement for consultation with the proposed members of the group prior to submission. The plan of works should only be agreed once							
A10	14, 20	the proposed members have been able to voice concerns, as has been the case with other OWF steering groups.							
		Natural England advises these conditions are amended to include a requirement to consult the membership of the steering groups prior to approval of the plans.							
A11	15, 21	Natural England advises that the Applicant considers amending the wording of Schedule 17 Part 1 and 2 Conditions 3 and 12 to ensure that the submission of the molitoring plan is in accordance with the timetable and process approved under the plan of works. We recommend amending the wording to make it clear the implementation and monitoring plans will be submitted at the appropriate juncture.	t I						
A12	16	When choosing a suitable compensation site to deliver compensation, consideration is needed on the potential for changes to environmental conditions at the location. These should include the potential for nearby developments that might reduce the effectiveness	5						
		of the compensation delivered as part of this development.  Natural England appreciates that monitoring is secured within conditions Schedule 17 Part 1 and 2 Conditions 4 (1) (f) and (2) (f) and 13 (f) This includes a requirement to implement adaptive management, or alternative compensation where monitoring reveals that impacts	-						
A13	17, 24	have reached certain thresholds. However, nowhere within the schedule is it secured that adaptive management measures, or alternative compensation measures must be implemented as approved. Natural England advises that the wording is amended to reflect this requirement.							
A14	18	The conditions set out in Schedule 17 Part 1 and 2 Conditions 5 and 14 disapply conditions 6,7 and 8 as well as 15, 16 and 17 of the same schedule respectively. These provisions depend, at least partially, on a third party delivering the compensation. As this third party would							
		be outside of the DCO, Natural England queries what would happen should the third party fail to deliver compensation?  Condition 6 does not secure a time requirement for the delivery of the compensation. Natural England advises that timing requirement							$\vdash$
		should be included for both proposals.  5.7.1 In-Principle Cromer Shoal Chalk Bed Marine Conservation Zone Measures of Equivalent Environmental Benefit Plan						1	
A16 A17	22	See comment on DCO Schedule 17 Part 1 and 2 condition 3 (a) and 12 (a) [Point A11)  Natural England advises that the requirement for a marine licence should also include the timetables for expected issue of a marine licence and a demonstration that licence can be obtained within the timescales of the plan.							
A18	25	Annex D condition 22 secures that no works may commence until the plan is approved. However, it does not secure the measures of benefit being undertaken prior to works. We consider that it is important the plan secures that compensation measures will be in place and functioning prior to the impact occurring.							
Document	t Used: 9.5 SEP and	DEP Offshore In-Principle Monitoring Plan [APP-289]			l			1	
A19	N/A	Additional comment. Natural England advises of the importance of securing a mechanism for adaptive management within the DCO.  We advise the bulleted list in Para. 20 of the Offshore IPMP [App-289] omits this key consideration, and that the potential for certain							
		monitoring to trigger the development of countermeasures (with associated monitoring of those measures) should be clearly stated in relevant tables of the IPMP, and incorporated into the DCO conditions where relevant.							
A20	N/A	Additional Comment. As the projects have included a requirement for cable protection within the CSCB MCZ, Natural England advises that a monitoring plan for any cable protection within the MCZ is included with the IPMP and secured within the DCC.							
A21	N/A	Additional Comment: In light of potential sediment disposal across the construction area including within the CSCB MCZ, Natural England advises that pre-construction sediment contaminant monitoring will be required for the purposes of suitability for sediment disposal. We advise this must be agreed with the MMO/CEFAS and secured within the DCO/DML.							
A22	N/A	Additional Comment: Natural England is concerned that no monitoring has been outlined which would provide evidence of the impacts of underwater noise to marine mammals. Please note that if the mitigation measures outlined in the MMMP are found to be insufficient then the DCO or another named plan must secure the action to be taken to address the identified issues and further monitored.							
		Additional Comment: Subject to Natural England's final position:  Ornithological monitoring of species/impacts subject to compensation (kittiwake, Sandwich tern and potentially guillemots, razorbills							
A23	N/A	and red-throated diver) should be conducted at the windfarm site as well as at the compensation sites.  Other species that are close to adverse effect (under HRA) or moderate adverse (under EIA) to be included as targets for monitoring.							
Adala	Comment	<ul> <li>Any other key areas of uncertainty that feed into the impact assessment should be included, for example sandwich tern flight speed/flight height, survival rates etc.</li> </ul>							
		Relevant Representation  Additional comment: Natural England advises that the Landscape management plan and the Ecological management plan required in  Schedule 2 part 1 requirements 12 and 14 should be amalgamated into an outline landscape environmental management strategy							
A24	N/A	(OLEMS). This was identified within App. I of Natural England's Relevant Representation [RR-063] and should have been included in Annex A [RR-063] as well for clarity. See Onshore Ecology Tab I, Point I13.							
A25	N/A	Additional Comment: Natural England wishes to work with the Applicant to secure a condition for strategic pink footed geese mitigation. See tab I - Terrestrial Ecology Point 110.							Ш
A25	N/A	Additional Comment: Natural England wishes to work with the Applicant to secure a condition for strategic pink footed geese mitigation. See tab I - Terrestrial Ecology Point IIO.							_

Onthing Conjuncts

Point	Point Number(s) from	Taken from Natural England's Relevant and Written Representations SEP AND DEP Appendix C - Offshore Onlithology Compensation (SR-663)	RAG Status Rel and WR Rep D1	Consultation, actions, progression	RAG Status	Consultation, actions, progression	RAG Status	Consultation, actions, progression	RAG status
Document	E ming [Vbb-00m [69-003]	15.5.2 Appendix 2 - Sandwich Tern Compensation Document	Rep D1						
	s case por cas	Ask of progress or instruction from compression or the experiment of the control							
		To have any confidence in the usbability of a portion for breading candwich term, Natural England will need to review detailed designs, which should be informed by species-specific preferences regarding trending site characteristics. Perferably, these designs would be broad at a location where underlish terms carrently bread at sub-optimal locations (e.g., due to disturbance or prediction pressure) or are should at all location site.							
CI	7, 11, 19								
		On the relation and information presented, throat England above that the legislance content is the preferred option of inflations contenting by provision in Japan and the render judge contenting any inflation includes contenting the provision in Japan and the render judge contenting any inflation includes contenting the provision option in the particular judge contenting any includes any included provision and in the provision option in the particular judge contenting and the regulatory development of the deligible contention of							
		programmes to suggested ours agreement underspected, our surgice and our surfacement our destination of understand our surfacement of understand our surfacement of the surfacement of t							
		The proposed scale of compensation is to compensate the annual upper GSG. Of shidt mostality, According to the Applicants estimates this ullinquiry the equivalent of 28 shidt facebox them to be dedicated into the opposition annually for the lifetime of the project. It is suggested that "120-150 pains be likely to produce about 100 chicks per year (equivalent to about 88 saluto)".							
a		To provide the requisite confidence in the number of recruits that would be produced, the methodology for calculation of a resonable target population for the compensatory measure should be fully detailed.							
		It would be useful to stress test the progosed colony size in terms of its ability to deliver the required compensation under a worst- case productivity scenario.							
а	9	The land to the southwest of Scar Point would appear to offer opportunities for habitat creation. Natural England requests clarification regarding the elected of the area of search, and exclusion of the apparently suitable adjunctive area to the exacts and west Natural England area that increasin the tile of slands within the cell is not likely to insulant collectation scenario. However, the							
		Contraction registering the extent of the same of season), who exhausts of the signature of the same and the same of the same							
		was available as the potential for habitat betweepeneity would be increased. The works would also then deliver greater ancillary benefits, e.g., to shorebirds in winter.							
C4	10	consideration of increasing this scale of habitate provision should also account for the fact that other species are likely to collocities. It may be of owned benefit, e.g., i.e. the case of black-beauing off increasing. It is caused in contrast that the result be increased competition for next this space. Further, a very quantity compact colony of sandwish seren might be many valenable to Mapproparations in the black-beauing off or axis predictors. Not forced predicting and delakes, case is gown person.							
		Aspects of the design such as electric fending should follow best practice guidance, e.g., Babcock and Booth (2000) Anti-predator Fencing, Tens Conservation Best Practice.							
Ш		Overall, Natural England would strongly encourage the Applicant to be more ambitious regarding the scale of habitat provision, and an exercer distribute encourage for the habitat provision during the Sourceoide.							
cs	12	We note that "Discussions with relevant landowers are underway to secure band or rights to deliver nesting habitat improvement measures at Lode, Rep., Ecotian.* The Applicant will provide PMS with a further update on the progress of these discussions following OCO application submission."							
cs	12	Natural England welcome this and highlight the importance of progressing efforts to secure land or rights to deliver nesting habitat. The measure cannot be considered secured until the completion of this process.							
H		We excline a underse themselves the Commission and will while as measurement. We note that the outlier reduces for the implementation of the habitat provision compensation measure aims to allow 2 full breeding seasons of operation prior to first power at SSP and DSP.							
C6	13	Sandwich tern recruit into the breeding population in their third year, and therefore the measure could in theory be delivering adults into the wider breeding population at the point of impact. However, colonization of habitat is highly uncertain in terms of time							
$\vdash$		taken, and uptake/growth. With a 2-year load in 8 is highly likely that the measure will accous a mortality debt in the formative warm. Calculation relating to the cultion of the measure regions do compressed a specified impact hough the stress tented against exercise other consists account to the second of the Existence of the second o							$\vdash$
		While Manual England are supportive of efforts to restare the Sandwich zero population on the Farne Islandi, we highlight that the principal laws identified as affecting the colory relate to supportion management (making in limitations to energing quive) and prediction from large laws. It is arristicated that the thirtconing Sandward statuses belowey 1980 (3) and will include sufficient measurements to address these. Daulid that plan has been inplicated, it is difficult to support the delivery of compressation through measurement as a softward in a first interest inflicient improvation to delivered by the law management plan.							
0	14	to address these. Should that plan here beimplemented, it is efficient output the delivery of compensation through measures that are not thought of sufficient importance to be delivered by the site management plan.							
H		While the provision of crimens to further understand gendation would vordischerelly provide useful unlessfed, data, and possibly relieves further represented this shaded on the sensitioned as a measure that could disselve woulde consequently. Provision of new bases, resolving by camers, and potential installation of bamboo cames to deter gold prediction is proposed at the Earne Infanct to improve breeding customs of Endanders thanks.							$\vdash$
		Same islands to improve breeding success of Sandwich sense. It should be noted that both next bowly inhelters and bamiloo cases have previously been used on the Farre Islands for the benefit of breeding terrs, and bowly felters are listly to be deployed in the Fazure it is also unclear whether the provision of 400 next bows and 400 others in area within coal segrent answhot home in lessless, and whether this proposed for sext assistancy counted for							
CB	15	sandwich terns or where it is hoped they could return.							
Н		Natural England remain concerned that the measures proposed are not truly additional, and in any event are likely to provide only minor benefit command to an complete operatures of execution and large and management. We consider that the widerious regulating regulated respectation reports and object provision in our specific to Sandwich term. It is not expected that Sandwich terms will next inside boxes, so next prodution is unlikely to be significantly reduced.							$\vdash$
C9	16	is not expected that Sandwich term will next inside boxes, so next prediction is unlikely to be significantly reduced.  If reducing prediction of chicks is proposed as a comprensitory measure, then a full understanding of existing levels and impacts of that prediction will be required in order to obeging solutions and quantify any benefit							
Ш		The current estimates of notacini pains from these measures sones highly speculation							Ш
C10	17	Natural England do not consider that the cited evidence is utilitized to suggest high uptake of next better by Endwich term. Sondwich term do not not within the boses of the laid of May (or interelves) Productively benefits trave not been quantified.  Again, it is very difficult to support the implementation of bamboc canes as compensation due to issue of additionality and the danger of simply repurposing as compensation laws and statements that if effective, by foods the incorporated into marker date.							
Documen	t used IAPP-070	In on Assertant  and ASP-07(1) S.S. 2 t and S.S. 2 2 Annex 2A - Annex 29 - Sandwich Tern Nextina Habitat Improvements Sta Selection				<u> </u>		<u> </u>	Ш
		General Comments  What has a light of the second of the se							
C11	18	developing a site there, or for potential adoptive management options if required.  The KRP proposal to instal a common term only to very dose proximity to the identified site naises some concerns, but also possibilities. For example, if the portroop was to be designed with Sadekith term in mindit would still be reasonable to assume							
Н		common team continuation of a contract reduction of teams control of the contract of teams of the contract of							$\vdash$
C12	20, 21	Additionally, five gozenial sizes usuable for developing breeding habitat for sandwich tern have been identified around Loch Ryan, transfulation has the montement reas of search.							
Document C13	22	We would not be a premium of the second of t				I			$\vdash$
C14	23	Natural ingland does not believe that adaptations to an existing structure are inherently more ixiesy to deliver productivity gains than provision of new structures. In fact, if well located and designed bespoke structures could well be more effective.							
		Regarding coale of the measure, a method to quantify benefit has not been fully detailed. This should be submitted into the Examination. We also observe that the Applicant equates binds (so if time filamborough and Filing Cast Spacial Prosection Area (FCC 9A) with brids remitting the biologycapping to population from which FCC 9Ad case is recurs. Calves all the other colonies that bit leaks groduced by the AAS could calcinse, Natural England does not consider this equivalence is likely to maintain the coherence							
C15	25								
		The measure is described as an intervention to an identified issue, but it envisaged that once ledges have been provided to compensed for losses from a known displacement then they will continue to function. Let, it is the interior to it is following years: the productivity of these edges will continue the measure of success. It extends conduct no feel measure is function. He measure is function. He measure is function. He measure is function which the measure is function to the measure is function. He measured is constructed, if it is appropriate to contribute Solitoring or solitoring in the measure is function. A solitoring is the measurement given the function produced produced and solitoring or solitoring in the measurement given the function produced produced and solitoring in the measurement given the function produced produced and solitoring in the measurement given the function produced produced and solitoring in the measurement given the function produced produced and solitoring in the measurement given the function produced produced produced and solitoring in the measurement given the function produced produced produced and the solitoring in the measurement given the function produced prod							
H									$\vdash$
C16	26	Our to the proposed similar and definition of success, there are high levels of uncertainty that suitable locations identified (or extension), will be available for the regarded scale of steements on our the lifetime of the project. It is published that prior to implementation, preprenentes and prolificional of determent resources and the new provision of inequile AMS catable fearings may already be excluded that from suitances also while providing high quality alternative less its. It is that would have been trappeted by the resource may be rediscrete, after the providing high quality alternative less its. It is that would have been trappeted by the resource may be rediscrete, after the providing high quality alternative less its. It is that would have been trappeted by the resource may be rediscrete, after the providing of the providing alternative less its inclusion. See all when he called the providing of the providi							
Ш		smany are excluding blint from multiance often while providing high quality alternative other. I.e., blint share would have been targeted by the measure may have efforcing and the potential for colonisation of inappropriate when locations, come of which are clearly sub-notined may be restricted. Askeral formation and position that we are not supporting of the further remaining of one.							ш
C17	27	inhunctional man harmsfront. As the properties of the further provision of conhors ANS, respectally in the lowestoft area, until the results of the currently planned provision start to energy, in the light of the recent planning application for an additional ANS and to the existing one at Gaitesheed Salt meadows, further provision on the Tyre seems also of questionable benefit.							
Documen	t used: [APP-074]	It is not riser that the measures amount how miles are not used to dedicted boundly deriver from the notation of near ARC. IS 64 - Appends 4- Genoret, Guilleman and Reportal Congenitation Discovered.  We note that GOM displacement and IS manuality rates there been used to estimate mortality of 6 guillement and 0.5 monthill a year white he more more than 100 to 10				I			$\vdash$
C18	28, 29	to be compensated.  Natural England does not support the use of a single rate for the purposes of impact assessment, advising that a range-based approach is taken interest. Heave see our offshore entshology comments. We also do not support the use of this specific rate for enabling compensation.							
Н		approach it takes intrade, whose see our offshore commonly definered, we also do not support the use of this opening rate for scaling companion.  Natural England do not consider that the provision of a portoon will deliver any meaningful secondary benefits for non-target							$\vdash$
C19	30	spacies.  If presiden of an inland good is also intended to provide non-like-for-like compensation for project impact other than Sundwich term the design must balance the varied habitat requirements appropriately and the habitat provided be of a scale and nature that would assult in measurable livests of benefit.							
C20	31	The design must balance the varied habitat requirements appropriately and the habitat provided be of a scale and nature that would reason in measurable inversional inversional inversion of the control of the control of a protected risks approximately and the control of the protected inversional pool with inlands at Losh Rigan would be utilised by sutterflued absorbed in figure that the control of a protected risks approximately inverse, we highlight that if a position was to be invasible distinct of their would be few, if any, substantial behavior and the control of their contr							$\vdash$
Н		herefit to these species. The nature actual of set not use in Northeast England is not clear from the test, or information supplied by the Applicant in Annex. 1D Record of HRA Derogation Consultation (document inference 5.5.1.4).							H
C21	32							i l	
1		Natural England request clarity on the exact nature of set netting activity identified, to understand the potential for bycatch reduction to provide compessation opportunities. Are nest for trust set from beaches and are they attended by fishers? Although it is attack that some fishers operating and its light with this skitchist is propherorated. It is light on the state of that account in what another operating and in the state of that account in what another increases.							
H		Natural Signal expects (strings of the resect states of an entire grading) identified in understand the proposable by special solution be provided supportune approximate in a resident trainer and modes and are they understand by faces? Although it will be seen to be provided by faces and the section of							
C22	23	Regarding the success of measures implemented at filey day to reduce suit bycatch the Applicant states, "the reduced bycatch achieved there may relate to the use of high visibility contine and the attendance of follows at nots with the aim of releasing any birds that become extrageld."							
H		Regarding the success of measures implemented at Filey Bay to reduce ask bycatch the Applicant states, "the reduced bycatch achieved there may relate to the use of high visibility contine and the attendance of fishers at nets with the aim of releasing any birds							
G2 G2	33	Regular file in access of financian in injection and of file in the class of access to financian injection of the file individual infection from the control of the control							
H		Seption for the content of measure of measure in special measure in the content of measure in the content of measure in the content of measure in content							
H		Separation of the contract of							
C23	34	Seption of the content of measure in processor and the pink to the content of the							
C23	34	Seption of the content of measure in processor and the pink to the content of the							
C24	34	Secretary for the contract of memory experiment of the layer to the contract of the layer to the contract of the layer to the contract of the layer to the layer							
C23	34	Secretary for the contract of memory experiment of the layer to the contract of the layer to the contract of the layer to the contract of the layer to the layer							
C24	34	Securing the content of measure representation in the legislation of t							
C24	34	Section of the content of the conten							
CIA CIS	25, 27	Section of the content of the conten							
CIA CIS	34 25, 37 38	Section of the content of the conten							
C34 C35	34 25, 37 38	Section of the content of the conten							
C24 C25 C27	34 35, 37 38 39	Section of the content of the conten							
C34 C35	34 25, 37 38	Section of the content of the conten							
C24 C25 C27	34 35, 37 38 39	Section of the control of the contro							
C24 C25 C27	34 35, 37 38 39	Section of the content of the conten							
C3 C	14 25,29 18 29	Section of the control of the contro							
C3 C	14 25,29 18 29	Section of the content of the conten							
C24 C25 C26 C27 C28	34 35 35 36 36 36 36 36 36 36 36 36 36 36 36 36	Section of the content of memory compounded or the layer to the content of the co							
C3 C	34 35 35 36 36 36 36 36 36 36 36 36 36 36 36 36	Section of the content of the conten							

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	Point Number (s)		RAG Status Rel						
Point	from	Taken from Natural England's Relevant and Written Representations SEP AND DEP Appendix D - Marine Mammals [RR-063]	and WR Rep	Consultation, actions, progression	RAG Status D2	Consultation, actions, progression	RAG Status D	3 Consultation, actions, progression	RAG Status D4
	Appendix D		D1					,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
	[RR-063]								
Documen	t Used: [APP-191] 6.	3.10.1 Marine Mammal Consultation Responses, Information and Survey Data.pdf			1		1		1
D1	3, 4, 5, 7, 8, 66	Natural England queries the methods used to determine seal abundance, both the reference population and abundance from the aerial							
DI	(RIAA)	surveys. Consequently, we are concerned that the number of harbour seals impacted has been underestimated, and so the impact on the Wash and North Norfolk Coast SAC.							
Document	t usadı [ADD 102] 6	JWash and North Norrolk Coast SAC. 3.10.2 Underwater Noise Modelling Report							
Documen	t used: [APP-192] 6.	The Applicant should clarify how they will determine ADD duration/deployment for simultaneous piling and ensure the draft MMMP					ı		
D2	10	includes this measure. Should this increase the overall area over which ADD disturbance will occur, then this should be featured in the							
DZ.	10	revised ADD assessment (see point D5).							
Document	tucadi [ADD 006] 6	1.10 Chapter 10 Marine Mammal Ecology					l .		
Documen	t useu. [APP-096] 6.	It is not clear whether simultaneous piling at one site is an option. If it is, the impacts of this scenario should be assessed as it may be the			1		ı		1
D3	18, 75 (RIAA)	worst case scenario for some impact pathways. For example, it should be assessed whether it would lead to greater overlap with the SNS							
DS	10, 73 (KIAA)	work case scenario for some impact patriways. For example, it should be assessed whether it would lead to greater overlap with the sixs							
D4	19	The number of animals impacted after mitigation has been applied should be assessed.			<del>                                     </del>		-		
D5	21	An updated assessment of ADD disturbance, based on likely ADD duration, should be presented.			<del>                                     </del>		-		
		The approach taken may underestimate the seal usage of, and transit through, the site. More information on the movements of seals in			<del>                                     </del>				1
D6	24	the site and surrounding area, based on telemetry data, should be presented.							
<del>     </del>	24 26 27 28 20	The assessment of indirect impact to seals due to changes in prey should be revised following our comments on: seal usage of the site,			<del>                                     </del>				+
1		sensitivity of seals, likely responses of key prey, competition, recovery. Should the impact be determined as significant as a result, further							1
D7		mitigation should be considered. Post-consent monitoring could also be considered to validate the assessment.							
	81 (RIAA)	Following this, the impact pathway may also need further assessment in the CIA.							
	OI (MAA)	The values used in the cumulative impact assessment should be reviewed and revised where needed:					<b> </b>	<u> </u>	+
D8	33, 34	- number of vessels during construction							
50	33, 34	- application of impact areas from SEP and DEP as 'standard' for offshore wind farms					1		
		The assessment concludes significant impacts from disturbance for grey seal and harbour porpoise in EIA terms. We do not agree that the							
		mitigation proposed will reduce the impact, therefore the residual impact is still significant. Further mitigation is needed to avoid a							
D9	22, 35, 37	significant disturbance impact. For harbour porpoise, further tools (e.g. DEPONS or iPCOD) could be used to investigate whether the							
		disturbance impact may be significant.							
Documen	t uspd: [APP_193] 6	3.10.3 Marine Mammals Cumulative Impact Assessment (CIA) Screening							
D10	40	The Applicant should provide further rationale as to why certain impacts have been screened out of the CIA.			1		ı		
D11		Mobile sources (geophysical, seismic surveys) should be assessed as mobile rather than point sources in the CIA.							
		4 Draft Marine Mammal Mitigation Protocol			•				
		Natural England advises the Applicant provides information in the draft Marine Mammal Mitigation Protocol (MMMP) on the principles							
D12	57,58	that will guide the acoustic deterrent devices (ADD) duration for unexploded ordnance (UXO) clearance and piling.							
		Clarify whether variation in strike rate will be included as a mitigation measures. Ensure this is reflected in the draft MMMP and the							
D13	58	assessment.							
Documen	t used: [APP-059] 5.	4 Report to Inform Appropriate Assessment					•		
		The pathway of physical and permanent auditory injury should be taken through to Stage 2 of the HRA, so that mitigation is taken into							
D14	65, 70	account at the appropriate stage.							
D	c=								
D15	67	The Applicant must undertake an in-combination assessment of impacts to the Wash and North Norfolk Coast SAC population specifically.					1		
246		The assessment of impacts to seal SACs should include impacts to functionally connected habitat in the wider environment that is used by							
D16	68	the seal features. Taking this into account, LSE may not be able to be excluded for this pathway.							
D17	75	The Applicant should consider committing to a maximum separation distance between piling that occurs on the same day.							
		The Applicant has identified the risk of a significant impact on harbour porpoise, in both EIA and HRA terms.							
		The Applicant should update their assessment of in-combination seasonal disturbance to the Southern North Sea SAC to reflect all noisy					1		
		activity that could occur through the season. Following this the area disturbed over a season may increase further.					1		
D18	83, 84, 86	The Applicant should consider committing to additional mitigation at this stage to minimise the risk of AEoI on the SNS SAC from noise					1		
		disturbance. Natural England has significant concerns over the effectiveness of multiple SIPs to reduce the risk. In particular the SIP has							1
		limited measures to mitigate exceedence of the seasonal threshold. Further mitigation should also be considered to reduce the risk of a							
		significant effect on the harbour porpoise North Sea management unit population.			<u> </u>		L		1
		The Applicant has identified the risk of a significant impact on the grey seal feature of the Humber Estuary SAC. They have stated that it is							
D19	90, 93	not significant for several reasons that Natural England does not agree with. Further information is needed to demonstrate that an AEol					1		
DIA	30, 33								
		will not occur. And/or, the Applicant should commit to further mitigation to reduce the risk of significant disturbance.							
D20	91	The Applicant should update their assessment of barrier effects with information on movements (from telemetry data) and area lost due							
520	21	to the effects.							
D21	94, 95	The Applicant should present an assessment of disturbance to harbour seals from the The Wash and North Norfolk Coast (WNNC) SAC							
		during piling based on the 25km disturbance range from Russell et al. (2016).							
		5 Offshore In Principle Monitoring Plan							
D22	N/A	New issue raised at deadline 1, see issues A21-A23 on the DCO/DML tab			I				

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on Los - Deadline 1

Point	Point Number(s) from Appendix E RR-0631	Taken from Natural England's Relevant and Written Representations SEP AND DEP Appendix E - Marine Processes [BR-062]	RAG Status Rel and WR Rep	Consultation, actions, progression	RAG Status D2	Consultation, actions, progression	RAG Status D3	Consultation, actions, progression	RAG Status D4
Documen E1	Used: [APP-090] 6	1.4. Chapter & Project Conception.  Mountar Egipted desire with the maintainm trench width needs to be durified in an updated discussent. Trench sizes quoted use a havinal option of 1.5 m quarted for the project of 1.5 m and a trench width of 1.5 m) quarted granuing a 1.5 degree in mech sixel sizepi. Network, in 1.6. 1,600 PG 201 Marine Geology, Consequently of 1.5 m for the method of 1.5 m) granuing a 1.5 m for the method of 1.5 m for the method of 1.5 m for the method, with an in richtic resident width of 1.5 m for the method, with an in richtic resident displacement width of 1 m for prime, Smaller, it is stated that efficient prime to 2.5 m for the method of 1.5 m fo							
12	2	is duffield, we are unable to confirm that the Worsh case Scenario (WCC) has been assessed and provide nature conservation advice on the significance of the any evidential rejects.  Manus Experie would switcene the provision of a substate locating exhebut for the proposed and existing colors due to make hardful and when the substance of the provision and a substate of the provision and a substate of the provision and a substate of the provision and the substance of the substance of the provision and the substance of the substance of the provision and the substance of the s							
									$\vdash$
Documen	3 Uhed: (APP-091) 0	The measure distriction of collab protection for contrage or spin as 12 and 220m with the measure shaped of collab contrage of 12 and 200m with the measure shaped of collab contrage of 12 and							
E4	4	The LE LEAR HAD AND AND AND AND AND AND AND AND AND A							
ES	seed: (APP-1811 6	18 Tibles in Namella 2 Wash Desire American 18 Tibles in Namella 2 Wash Desire American and SEP. The maximum diseases of a self-collection for SEP of SEP							
Documen	3, 6 used: [AFF-102] 6	the WCG presented in Capture 4 (IPV-900) which would lead to slightly greater impact on the wave climate. Additionally, Para 59 (IPV-912) in that the nath the GEO was downstern of 12 me of 100 well-bases. This differs from the base determine presented for [Ipve 7.5 Hourist England and solvins that the assessment currently deserved reflect the warry to take scenario and advises that this needs addressing in an updated document before a 3-20m shift, dismenter can be agreed with critical residual control and advises that this needs addressing in an updated document before a 3-20m shift, dismenter can be agreed with critical residual control and advises that this needs addressing in an updated document before a 3-20m shift and advises and advises and advises and advises that this needs addressing in an updated document and a shift of the advises and advises and advises and advises that this needs addressing in an updated document advises and advises and advises and advises and advises that this needs addressing in an updated document advises the advises and advises and advises and advises that this needs addressing in an updated document advises the advises and advises and advises and advises that this needs addressing in an updated document advises that the assessment current advises and advises that this needs advises that this needs advises that the advises and advises that the advises and advises that this needs advises that the advises that the advises and advises that the adv							
16	7	There are potential currulative impacts due to overlapping Operation and Maintenance (CRMI) activities at Waveney, Bigthe Hisb and Egood William (Wire observed that Bighels has been considered in Chapter 6, but not Waveney or Egood. Natural England advise that Waveney and Egood should be included in the currelative impacts assessment (CRI) to fifty understand the potential impacts.							
Documen E7	used: (APP-289) S	SOfficer in Principle Monitories that IMPM?  We note that which summare recovery integration has been included for post-construction in the Tab. 3. of the IMPM, sandbanks have not.  Solars England shale that sandbank monitoring should also be included in the IMPM to ensure that the null hypothesis is correct in relation to marker occusions.  15 Childrager & Marker Geology, Occasiography and Physical Processes							
Documen	used: [APP-092] E	1.6 Chapter of Motive Geology, Consequently and Physical Processor.  The Endean Committee of Com							
E9	10								
E10	11	simificance of ineach?  Manust England advises that the reap and spring slidd excursions should be provided. The spring slidd excursion is useful for extending the potential extent of direct changes to flows as well as the unitigated maximum sound followers for sediment planes. We advise that the reap/plane (advise countries should be quantified. It would also be useful for the Applicant to provide a map showing the spring slidd eliginas sounds the state of the sediment of							
E11	12	arous the ubdg max.  The 117 ration that be using it to the mobility of liciticones used along the 159 and 050 cobile corridor, there is the potential for movement of this residence of separate or hard of the underlying pological units. Natural linguist of quarters what is the potential is seader mobility here and auditment to appropriate or hard of the underlying pological units. Natural linguist operation when the potential is subdef mobility here and auditment to appropriate fails in the horizontal facility to the sediment transport potential could be provided by the Applicant in an updated chapter in order to assess cable burial success.							
E12	13	The HE Willingford (2002) supported software concentration (SCC) data sets are old. Within the Colleg 1000) data on ensure, they are not also -specific, instead referring to "the seas around the UK". SCC should ideally be collected throughout the water column over a range of representative tolds, reasonal, and wave condition. If data have been collected for COV and/or SCVW, those data would be considered assertion that and the object of the COV and the COV a							
E13	14	older than five years should be used with care. Furthermore, it is not clear which geographical area these sediment transport notes roblet to, and it would be useful to clerkly this. Natural England advises that more recent regional net sediment transport data should be used and more convised provided within an updated chapter on the regional net sediment transport rates in order to have any certainty in the conclusions drawn by the Applicants.							
E14	15	drawn by the Applicant.  Morant England witcomes the inclusion of sandbanks in the hist of impact receptors. However, we believe it is important that the Applicant include in this hist, all nursive protected areas that could be affected by charges to physical processes due to the proposed development (seem if they are considered and assessed in other chapters). This should also include supporting habitati. Furthermore, all relevant murine protected areas should be identified on the appropriate figures or responsible this chapters.							
E15	16	process greater recent that when the set of							
E16	17	should be football and many for some that all potential impact pulsaways have been throughly assessed.  Para 113. These include information on the source of the ciff erosion raise and those the thereline erosion has been taken into account in Chapter 2 [Tab Selection and Assessment of Alternatives, Manzal England advisors but it is important to consider record ciff and basach profile source spins, designed to larger element excess (i.e., a year), in tode to a reliable that hashes to it is also so that for consider clearse change registers confirmed excess the consideration of the considerat							H
									$\vdash$
E17	20	Noticed England question if multiple coincident direiging operations are likely to occur during development and what would the worst case assentiate would have This could potentially invited or more spitally elements and relief to the content states and effective places. The WEST should be quantified in here or deproduct element concernition judices above any previous and sud-most deposition follows. Notice state England address that further carries a required within an optional output covering these points to even that the MCSs has been find considered.							Ш
E18	21	Para 110. The WHC for changes in SSG, due has sended preparations for the function institution would be an outside with Grantly base Concluming (GSE). The delivery of entiring of entired section from giving the proparation of Steep Consolitions as ill sail to be stated and Steep Associations as in a change of the state of the state of the STE array, will serve the force Conseaugh, Ross also and Steep Association Steep Ass							
£19	24	Natural England notes that no sandwave levelling is expected for the "SEP in lociation" scenario because there are no sandwaves present along the ECC. Therefore, any requirement for sandwave levelling activities haven't been assessed. Please clarify whether the exclusion of							
		collections was every users, are was to security by a stromation with not acceptable pairs.  Person 239-41. The 2014 of 2000 Was also end invalidation quantification of registrated changes are wards analogues for sediment disturbed by export cable installation of the current proposals. However, it is not clear if there is 500/ICDOW and beingour y disturbance with the compared the installation and burst or executed in element disturbed concept with those pointed for 500/ICDOW and beingour y disturbance with the compared the sediment of the 500/ICDOW and beingour y disturbance. The other is the compared to the sediment of the 500/ICDOW and beingour y disturbance with the sediment of the 500/ICDOW and beingour y disturbance. The form of the 500/ICDOW and beingour y disturbance and the 500/ICDOW and beingour y disturbance and the 500/ICDOW and beingour y disturbance. The 500/ICDOW and beingour y disturbance and the 500/ICDOW and beingour y disturbance. The 500/ICDOW and beingour y disturbance and the 500/ICDOW and beingour y disturbance and the 500/ICDOW and beingour y disturbance. The 500/ICDOW and beingour y disturbance and the 500/ICDOW a							
E20	25, 26, 27	common distriction, inclosing the size of LLI storm large, which are sense to make great or comply as the absence that these has the distriction.  Park 2.6 for this that elevant 65 CL, above presulting conditions are anticipated at the 100 CM applicit, but the size of the 100 CM applicit, but the complex we also lailing to means within the range of the compound resemble or the complex of the 100 CM applicit and							
		in all instances, Natural England advises that, within an updated chapter, it should be shown how the SOW/DOW trench size and amount of disturbed sediment compare with shose for SEP/DEP and quantitative evidence should be provided to support the predictions regarding SSCs.							
		Ontit in is a provided fishard Engined is writed to support the consistent drown by the Applicant.  Per 3.15. Given that HCC Traverses the CCSD MCZ, it would be very highlift the bytem model data for SCM/COM could also be provided as prefixed deposition footprint for representative locations between the ICD sett boston and seward boundary of the MCZ. These should be representative of the different selections and seward flow of the CCM white MCL and also include the ICD sett boston in the CCM white MCL and also include the ICD sett boston.							
E21	28	Furthermore, it is not stated what the estimated deposited undiment thickness may be for the different undiment fractions (i.e. flostjestad/juviners) cause by the seport cable installation. Can estimated deposited undiment thickness to be provided for the different solement factions 27 in a model deposition forwards and thickness handles provided for location propertiess of the different solements you may large the LCC within the MCC and clouds the fall of cell boards. Loted this provided we are unable to agree with the opposited in causicions in the SSC deposition and properties impract are sent of investments.							
		in the Stage I CKGI MCZA (DOC Ref 5.6), the pressure "Smothering and siletion rate changes (light") has been used for the sensitivity assessment where "Ref deposition is defined as "of up to Smot Off for material added to the habitation is single, discovered," and Search oppositions in up 15 Conf. of the material is Section II 12.7 (Days of CCGINICA). It is that that deposits on up 40 Conf. of the material is Section II 12.7 (Days of CCGINICA). It is that the deposit only only on the other where the section is the Conf. (Days of Conf. II 12.7 (Days of CCGINICA). It is not before a whether is not before a destinate of deposited self-meet disclosers stated. Consequently, it is not exclosed whether is materially and self-meeting of the CCGINICA "negligible" as standard in Table 2.7.1.							
E22	29	cutaget or , or the impact regignes accesses, given the prescues the year recovery time.  First 20.08 2.05 (hougher 6), it would helpfull the nationals for the Consudered deposition thickness could be granded and also the reliconal for the migglides sensibility assessment for the CSCB MCZ. Until this clarification is provided we are unable to agree with the Applicants concluding.							
E23	30, 48	We note that no sundeaver leveling is articipated for the "LID" in bubblion" contacts. However, it may be required in a "GEP in bubblion" or 25 and GEP constrain. This could lead to impact on meanly suitability general publicipated instance (e.g., the Conver Cook), Beninghans Shool) inhority sundeaves bening the Section of the Cook of the C							
		reg. Cutae. Larged the seast region cases,  Assumed Targed addition that the largest to be subdied geomorphological features due to sendence leveling should be adequately assessed, and indirect effects on other receptors be considered in an updated chapter. An assument should be carried out to provide resources that there will not be any linge term morphological effects. We added that table 6-46 mp or envision following this sort.							
		Para, 202 & 201. The evidence from Race Bank OWF provides some useful image to the potential impact of sundaware levelling at DEP N-DEP.  5. However, in order to understand whether the andwaves are likely to regenerate after invelling, or be adversely impacted along with any addiscent bank values. It is first necessary to assess the seafed morabeloay at the factions require underselve leveling under ball-writering.							
		usively data. In turn, the artificipated ranges of natural seabled change, surdeview negration rates and expected sediment variability should be assessed. This would inform the baseline upon which morphological change and variability can be assessed throughout the project development and lifetime.							
E24	31, 32, 48	This work should enable forecasting of alse-specific undexware regeneration threatest. We adone that anticipated ranges of natural swabed change, sandaware migration rates and anticipated sediment variability is bound by further assessed using bathymetric survey date, for those locations lavely to require leveling (pre-severing), in addition, we are unable to agree with the magnitude of effects on bediond undermet transport for undexware leveling within children coalst corridors (presented in Table 6-18) owing to the uncertainty regarding sandaware recovery stSD/QSC and potential impacts on adjusted book systems. Natural England admit with the assessment destined above though the							
		carried out in order to gain more certainty regarding the likely regeneration of sandwaves following levelling. Until this is provided we are unable to agree with the Applicant's conclusions on sandwave recovery with any certainty.							
E25	34	Oven the greater spatial extent of the combined SDP/SOW and DEP/SOW are separate complex seabled topography, there is the potential for more spatial variability in tidal behaviour arount the arrays. He, in Para. 134, it is thated that changes to seabled distribution due to turbine foundations at 500 West eminding, insplicitly and takegas to fail cannels for fail wavel and one of the variability and provided as that the self-most fail of							
126	35, 48	specimen on the controllar transit on the amounteerfulnether.  The 13 states have displanted impact on the side current agrees is artispased for 139/COP and therefore the impact on sunshanks is entitipased to be registed softers. Elevative greater paid advantages and the being softered to the registed softers. Elevation with other paracticionary approach should be subjected. Cover the greater paid advantage of the combined 425/ONG, and OFFIDOR of mornior, complete souther together, and optimised from respect and variables in their limitation covers the arrays the potential impacts on a nearly acceleded, whereas should be considered and assessed. Until this is provided Matural Digitation unless the great with the application control on the specification con the legislations and the specification could be specified to specific and an acceleded to the specification control of the specification control of the specification control on the specification control or specification and the specification control or the specification control or specification controlled the specificati							
		across the arrays the potential impacts on a nearby sundbook systems should be considered and assessed. Until this is provided Natural England is unable to great with the Applicative, conclusion on the syndrocance of the potential impacts.  Natural England are not able to agree with the assessment of Troquency as TMedium' in Table 6-11. We would adulte that the Troquency or							$\vdash$
E27	37	bland Egyptid or existable to get each the assument of "Programs" or Marken's Table 6.21. We would adult the the "Programs" or Marken's Table 6.21. We would see that the the "Programs" or Marken's Table 6.21. We can be promoted to descript with high frequency, Matter Organic adults that the assument is updated accordingly to better determine impacts alone and currentatively.  76x 3.21 As that that the types to marke gooding, consequency and physical processes would be look in regardad and largely confronted out alone was the second of the confidence of the second of the confidence							$\vdash$
128	38	provided to support these conclusions. Until this widence is presented we are unable to support the Applicant's conclusions.  Para. 334 refers to "the evidence from theoretical studes", however it is not clear which theoretical studes are being referred to. Natural England requests that the predicted effects on sudement transport processes also to the OSBA OSB2 and OSB Pandod by provided. For							$\vdash$
E29	39	example, changes to the predicted frequency excendance of the critical shear trives could be assessed. This could inform changes to the percentage of time that the spatially-unrying typical sabed a selfment across the development is predicted to be mobilised by tidal and wave processes. Natural England advises that the predicted effects on sendement transport processes due to the OSMA of the development broadle be considered over the lifetime of the project and included in an updated assessment. Until this is provided Natural England advises that there is uncertainty in the conduction drawn.							
E30	40	Para 117. Geophysical survey date from the existing OWFs are useful but conclusions drawn are too vagen to provide any useful comparison with SECOD. Natural England requests that further information such as when this survey was understates, what the most and localized interests register to desire this, but he subside its design and quaded and survey. In the England and the project contractions survey show any collected of charget to sundaws in emphology or registron as account 2007 This full remarks in request of to their determine potential charges to sundaws in englanding, and provided the concession with the Concession of the Conce							
E31	41	thrages to anotherisk morphology, and provided the recovary evidence to support the Applicant's conclusions.  Paret 119. Predicted effects on self-invent transport processes due to the GBMs of the development have not been evaluated, neither have the conclusions in the array(s) been sufficiently characterised to enable us to agree with the sensitivity and value assessment (Table 6-14). Natura England advisors that further evidences should be provided to support this assessment, before conclusions can be confidentially supported.							$\Box$
E32	42,43	Togeted shalm that further evidence should be provided to upport this assument, before conclusions can be confidentially supported. Mr MCS (Pars. 165) in the course protection to be provided for all foundations. It is not clear whether a succer assument has been certified out. Which I pars. 215 takes that it hill kell what any secretally social effects would be confided on within a few metrics of the direct foundations of the size of							$\forall$
		of scound material from paroon foundation shouldown in terms of elevated SSCs, and resulting disposition should be considered to provides MCSs in relative speciation served into earlier states when the Policy SCS and the should Scrains between codes in the SCSEARC. It is not stated whether have fined in the consideration of the Country depth, then the could have related on selferent codes of the Country depth, then the could have related on selferent to impose in the resultance. Natural England adults that of this considerable should england the considerable should be supported to the self-considerable should be supported to the self-considera							$\vdash$
E33	44	to negate the need to place case protection.  Para, 195 states that it is not known whether cable repair and reburial will directly impact on sandbanks and sandwaves in the area during							$\vdash$
E34 E35	46	the operation phane. Natural England queries of there is any relevant endonce available from DOW/DOW that could be drawn upon here? Without this inference was exual but sold when or the significance of any opining disreption to marrier processes over the life time of the creates. Proc. 416. The curvaletive effect on sediment transport processes at sandbank systems is not discussed here but should be considered. Until Proc. 416. The curvaletive effect on sediment transport processes at sandbank systems is not discussed here but should be considered. Until The curvaletive effect on sediment transport processes at sandbank systems is not discussed here but should be considered. Until The curvaletive effect on sediment transport processes.							$\vdash$
203	**	this is provided we are unable to support the conclusions which have been drawn.						·	



	Deint Neurite (1)								
Point	Point Number(s) from	Taken from Natural England's Relevant and Written Representations SEP AND DEP Appendix F - All Other Marine Matters	RAG Status Rel	Consultation, actions, progression	RAG Status D2	Consultation, actions,	RAG Status D3	Consultation, actions,	RAG Status D4
	Appendix F [RR-063]	[RR-063]	and WR Rep	,		progression		progression	
Occumen		1.7 Chapter 7 Marine Water and Sediment Quality							
		In light of sediment disposal potentially across the construction area including Cromer Shoal MCZ, we consider pre-construction sediment							
F1	4 & 6	contaminant monitoring will be required for the purposes of suitability for sediment disposal. We advise this must be agreed with the MMO/CEFAS and secured within the DCO/DML.							
Documen	t Used: [APP-094] 6	1.8 Chapter 8 Benthic Ecology	1		1	1	1		
		Whilst Natural England welcomes the Applicant's commitment to decommission cable protection within the MCZ we advise that an Outline Decommissioning Plan should be provided at the consenting phase to secure and assess decommissioning activities in one location.							
F2	8	However, regarding the decision to leave in-situ scour protection, surface laid cables and external cable and crossing protection outside the							
		Cromer MCZ, we continue to advise that regardless of legislation, decommissioning should aim to remove infrastructure to avoid irreversible (permanent) habitat loss, thus returning the seabed habitat to its pre-developed baseline status as required by OSPAR.							
		in eversible (permanent) habitat loss, thus returning the seabed habitat to its pre-developed baseline status as required by OSFAN.							
		Natural England welcomes the commitment to microsite around sensitive benthic features and habitats if identified by preconstruction surveys, such as those protected under Annex 1 and UK priority habitats identified under Section 41 of the NERC Act 2006. However,							
		Natural England advises this commitment needs to be secured through a condition within the DCO/DML or within an outline named plan.							
F3	10	Natural England agrees any Annex I habitat such as Sabellaria spinulosa reef habitat identified would be outside of a site designated for benthic features. However, with regard to footnote 6, we advise if Annex I habitat is identified the Applicant recognises their value to be							
		equivalent to if they were within an MPA. This forms part of the UK government strategy of achieving the UK Marine Strategy of achieving Good Environmental Status (GES) of the UK wider seas regardless of whether sensitive species and habitats are located within an MPA							
		network. We advise the Applicant to be fully committed to the protected status of protected sensitive habitats and species, regardless of							
		whether they are located within a MPA.							
		Natural England welcomes the Applicant's consideration of the guidance documents as outlined. However, when developing outlined named plans, we advise that the Applicant also uses guidance developed by Natural England for "Environmental Considerations for							
F4	11	Offshore Wind and Cable Projects". This includes "Offshore Wind Marine Environmental Assessments: Best Practice Advice for Evidence							
		and Data Standards" for baseline characterisation, pre-application, data and evidence expectations at examination and for post-consent monitoring. In addition, advice is also provided on "Nature considerations and environmental best practice for subsea cables in English							
		inshore and UK offshore waters".  Natural England welcomes the characterisation of the out-cropping chalk feature observed from seabed video imagery at Station EC-26							
		adjacent to landfall using guidance within NERRO80 Natural England Marine Chalk characterisation Project.							
F5	13	However, Natural England continues to advise that across much of Cromer Shoal MCZ there are areas of subtidal chalk lying underneath a							
13	15	thin veneer of sand/sediment which we also consider should be protected as outcropping chalk/subtidal Chalk Feature of Conservation							
		Importance (FOCI). This is in accordance with our advice on fishing activities and would ensure consistency with MCZ assessments undertaken for other industries.							
		We acknowledge the assessments for stony reef at Stations EC_03 and EC_24 were classed as 'low 'resemblance to stony reef according to							
		Irving (2009 and Golding (2020) and therefore at these locations where seabed imagery was acquired there was insufficient evidence to							
F6	14	classify as Annex I Reef Habitat. However we advise that the habitat classification for Station EC_03 of sublittoral coarse sediment (SS.SCS) and Station EC_24 of circalittoral mixed sediment (SS.SMx.CMx) are among the biotopes listed in Golding (2020) as biotopes where reef							
		may be found. As such we continue to advise that the potential for stony reef Annex I habitat is not entirely ruled out from pre- construction survey assessment. We advise the Applicants commitment to avoid and microsite for Annex 1 habitats continues to include							
		Annex I stony reef as a precautionary measure and as such is secured in DCO/dML named outline plans.							
		It is stated "A section of transect SS_21A in the SEP wind farm site represented the biotope A4.231 'Piddocks with a sparse associated							
		fauna in sublittoral very soft chalk or clay". This biotope is classed as illustrative of the UK BAP priority habitat 'peat and clay exposures with piddocks'. We request that the Applicant provides clarification on the classification of this habitat and as a precautionary measure							
F7	15, 18	commitments to avoiding impacts to this feature if identified.							
F8	16	Please be advised that, Sabellaria spinulosa reef of all quality is protected under Section 40 and 41 of the Natural Environmental and Rural Communities (NERC) Act 2006. Therefore, outline DCO/dML named plans must be updated to demonstrate that due regard will be given to							
	10	the conservation of this habitat where it forms definable reef.							
		In the context of the conservation objectives for the features /habitats within the Cromer MCZ, Natural England advises that the sensitivity							
F9	19, 21, 23	of these habitats within the site should be considered high in recognition of their representative protection 'value' through the MCZ and not medium as classified by MarESA. We advise that the impact significance of 'moderate adverse' is applied to both the assessment of the							
		habitats and biotopes within the MCZ and the WCS for Annex I / UK BAP priority habitat S. spinulosa reefs and the UK BAP priority habitat							
		'peat and clay exposures with piddocks'. The assessments should be updated to inform the HRA/MCZ Assessments.							
F10	20	We advise that a commitment is required to mitigate potential operational impacts during any operational and maintenance (O&M) activities to ensure that every effort is made to avoid impacts to Annex I / UK BAP habitats if naturally present on the surrounding seabed.							
		Impact 3: Long Term Habitat Loss. Natural England welcomes the commitment, as also outlined in the Outline CSCB MCZ CSIMP, to the use							
F11	22	of removable rock bags as cable protection, thus minimising permanent habitat loss within the MCZ. However, every effort should be made	e e						
		to minimise the need for cable protection within the MCZ. Natural England advises that commitment to undertaking a stepwise approach through the mitigation hierarchy.							
Documen	t Used: [APP-188] A	ppendix 6.3.8.5 – Benthic Habitat Mapping							
F12	24	Figs. 22 and 23 provides best available evidence of sediment most likely to support herring spawning and sand eel habitats. We advise that this highlights the importance of DEP N to sand eels and thereby Annex I Sandwich terns. We advise further consideration is given to							
Ocumen	t Used: [APP-190] A	removal of turbines from DEP N ppendix 6.3.9.1 – Fish and Shellfish Ecology Baseline Technical Report			<u> </u>		<u> </u>		
- Junior	, , , , , , , , , , , , , , , , , , ,	Natural England note that data from otter trawl surveys in 2005 and 2008 showed that herring was the most abundant species caught.							
		Additionally, pre and post-construction herring spawning surveys were conducted in 2009 and 2010. Both data sets support herring being a							
F13	25, 26	key prey resource for Annex I Sandwich terns in the second part of the breeding season. However, in both instances, Natural England acknowledges the age of the data. And, while we defer to CEFAS for recommendations of further data sources to complement this data							
		and potential requirement for pre-construction surveys, we highlight the wider ecosystem benefits in terms of management measures for							
Documen	t Used: [ΔPP-102] Λ	Annex I birds from further data collection. Natural England will continue to discuss this with the Applicant and other interested parties.  ppendix 6.3.10.2 – Underwater Noise Modelling Report			L		<u> </u>		
F14	27	Natural England advise further underwater noise assessment is undertaken which includes concurrent piling from SEP and DEP. However,							
		Natural England defers to CEFAS to assess the outcomes from this additional assessment for fish species.  9 Offshore Operation and Maintenance Plan (OOMP)							
		Natural England advises that because O&M activities are only mentioned and not clearly defined we do not believe that they have been							
		assessed and therefore further information is required to undertake any HRA/MCZ assessment.							
		Natural England advises more information is required on what is considered to be 'corrective work' and if that is permitted on the DML.							
		The following information is required to assess the impacts from O&M activities:  •Number of vessel transits per activity per day/month							
F15	28, 29, 30, 31, 21	• Timing of planned maintenance work							
L12	20, 29, 30, 31, 21	<ul> <li>*Agree what are emergency works</li> <li>*Separate out inside MCZ with outside MCZ and other designated sites</li> </ul>							
		Monitoring to be undertaken to inform 5 yearly review     How often will a sub-bottom profiler be used and how will the noise be taken account of							
		•Molume of additional scour prevention around the turbines over the project lifetime							
		•If scour/cable protection in new location – where, how much etc. •Confirm bird scarers are not noisy scarers which can disturb Annex I birds							
		•More detail on the use of drones for offshore inspections							

G-Cromer MCZ

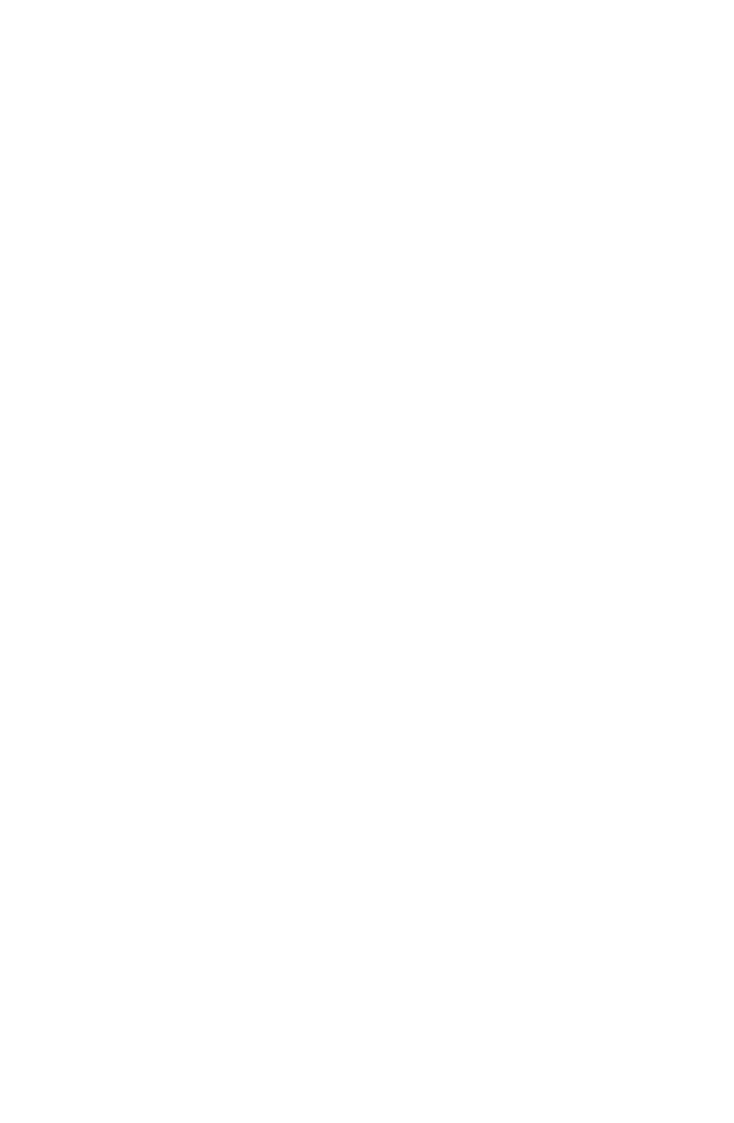
Natural England's Riok and Issues Log - Deadline 1

Point	Point Number(s) Appendix G [RR-063]	Taken from Natural England's Relevant and Written Representations SEP AND DEP Appendix G - Cromer MCZ [RR-063]	RAG Status Rel and WR Rep D1	Consultation, actions, progression	RAG Status D2	Consultation, actions, progression	RAG Status D3	Consultation, actions, progression	RAG Status D4
Broadsc G1	ale theme 1: Small:	Natural England doesn't agree with the Applicant's Stage One MCZ assessment in relation to the defining the magnitude of impacts because the assessment has been approached from an EIA perspective rather than one considering whether or not the conservation							
	-	objectives for the site will be hindered. Please see Annex 1 of [RR.063] Natural England's Relevant and Written Representations SEP AND DEP Aboendix G - Cromer MCZ for further details on Natural England's standard position. Whitst Natural England acknowledges that the MCZ consists of broadcale habitat types rather than features akin to Annex I habitats							-
G2	2	there are areas that are FOCI or have broadscale habitat sub features that provide a defined function with differing sensitivity in which impacts should be avoided. Unless the Applicant can suitably avoid, reduce or mitigate impacts to these features we believe that a Stage 2 assessment is required.							
G3	3	Para. 193 [APP-077]. Natural fingland advises that calculating impacts as a percentage of the whole MCZ is mileading given the size of the site. The impacts from SEP and DEF combined are still stressled at 0.18 has found able protection. Natural England queries if further refinement of the assessment relating to feature extent could be undertaken?							
	ale trieme 2: Lastin	**Natural England welcomes consideration of removal of cable protection at the time of decommissioning; if removal could be achieved, Impacts would still last for the lifetime of the infrastructure (40 years) and potentially longer as a residual impact. Therefore, because this impact is lating/long term and site recovery wouldn't be assured, Natural England's view is that reasonable scientific doubt and the properties of the properties o							
G4	4	this impact, a samigraring term and site recovery abouts it or asset on, natural at trigitiant as sever as time, shouldouter scientists, books whose likely remain registring the impact of the proposable on the conservation objectives for the site. Accordingly, we advise that a more precautionary approach is required when considering the generational impacts to the designated site features both alone and cumulatively and operatual requirement for MEBIs to offer these impacts.							
		cance of impact - Alone  Natural England doesn't agree with the Applicant's conclusion in Para. 268 of [APP-077] that there will be no significant risk of the activity hindering the achievement of the conservation objectives for Cromer Shoal Chalk Beds (CCGB) McZ. Of particular concern is the							
G5 Broadsc	5, 6 ale theme 4: Signifi	area of mixed sediment within the cable corridor, which has a more diverse community. Should cable protection be placed in this location then Natural England advises the conservation objectives to restore/maintain features will not be achieved. acnee of impact - in combination/cincumstate (including TIES)							
G6	7, 8	While, the Marine and Castal Access Act (2009) does not provide any legislative requirement for explict consideration of in combination or cumulative impact assessment to be undertaken when assessing the impacts of iterated schridtives upon a MAC; we agree with the MMO in considering that in order to fully discharge regulation; duties under section 60 (L) of the MCAA, in combination and cumulative effects must be considered. We acknowledge that Pass 3 of the Sages 1 MCA assessment (149-70) consider 118th is inform such as assessment. However, we advise that the 2013 guidance on TESs has been updated in Natural England's Best Practice Guidance. see Pass 2 App. Gel (98) 603.							
		Natural England advises that due to existing/predicted impacts from post designation sustainable development the site's carrying capacity for further development is compromised. This will be reflected in the updated Conservation Advice due to be published in Spring 2023.							
		Natural England considers the operational and maintenance phase activities for DEP (and or) SEP combined with existing Windfarm and Oil and Gas projects will result in lasting habitat change / physical disturbance which will further hinder the conservation objectives of the CSCS MCZ. Their kids of, and observed, reduction in designated habitat extent which has occurred and/or is preficted to arise from							
G7	9, 10, 11, 12	the CLS mIC. The not us, an ousewest, resolution in desplaces instant existin many large states or unine many the above developments has mean that the MIC is highly lakely to be taken further away from its required consensation state in the future. Unless these unanticipated significant impacts on the MIC are addressed, Natural England advices that the overall coherence of the national site network as designated is at risk from a lasting habitat change/loss over the filterine of the consented/built projects.							
		We strongly advise that Applicant's potentially affecting the MCZ will need to intensify their use of the miligation hierarchy to avoid, reduce and miligate their impacts to a level where such effects cannot arise.							
Broadsc	ale theme: Impacts	Lot Chalik  Whilst Natural England agrees that areas of current outcropping chalik have been identified from the geophysical survey it does not							
G8	13	agree with the Applicant's assessment that CSGB MCZ Subtids (Chalk PCCI is are restricted to these areas. Across much of the site there are areas of subtidal chalk lying underneath a thin veneer of sand/sediment i.e. subcropping chalk. We advise that chalk with sediment veneer should be considered as subtidal chalk feature (HOCI 20) when assessing impacts. This is in accordance with our advise on							
		fishing activities. We advise that any assessments are updated accordingly.  We note that the applicant's sensitivity biotope mapping (JAPP 079) S.c. 2 Appendix 2) is based on the veneer within the glacial channel rather than the sub cropping chall, which does not align with our advice [point G7]. Thereby whilst we may be able to agree with an assessment that incidents that if oblise are installed as described within the veneer, chall will most be physically impacted, this position							
G9	14	assessment that indicates that if cables are installed as described within the veneer, chalk will not be physically impacted, this position would change should cable protection be proposed in these areas no matter the current stability of the sediments within the glacial channel.							
G10	15	Natural England advises against locating the HDD out pits in any area of sub cropping chalk and wishes to emphasise the significance of the potential impacts will increase if this can't be secured in the DCD/GML.							+
Broadsc	ale theme 5: Mitiga	ion - Standard Best Practice mitigation and application to SEP/DEP Reduce number of export cables though use of HVDC system or coordinated approach with other projects - Norfolk Projects: [APP-077 Section 5.1 [47] notes the potential for progressing a single ops serving both windfarms. Natural England is most supportive of							
G11	16b	this option due to the ecological benefits both for marine and terrestrial receptors. Otherwise, we would strongly encourage commitment to an integrated transmission system being progressed with HDD ducts for both SEP and DEP being installed when the first project constructs to reduce the impacts.							
G12	16e	Micrositing cables around reef and other features of ecological importance: Natural England notes that this is referred to in the various SEP and DEP documents for the MCZ, but equally this is not secured as a condition on the face of the DCO/dML. Natural England would welcome this being secured as a condition. See item A4 of the DCO/DML tab.							
G13	16f	Sandwave leveilling to reduce risk of free spanning cables and requirement for external cable protection: Natural England notes that there is no requirement for this mitigation measure within the MCZ, but would welcome this mitigation measure being secured.							
G14	16g	Adoption of the reburial hierarchy with external cable protection being last resort – Whilst reburial is mentioned in various documents the reburial hierarchy is not. An outline of the process for reburial should be included with the MCZ Cable Specification, Installation Plan and Monitoring Plan (PAP 2014).							
G15	16h	Pre consent undertake a cable burial risk assessment using geotech data to focus cable protection requirements to areas where cables are likely to be sub-optimally buried e.g. mixed sediment - to apply for a realistic worse-case scenario: Whilst, the Applicant has undertaken a cable burial study 9.7.1 and 9.7.2 [APP-22] and 9.293 (these are only interim and are reliant to being updated post							
		consent. Therefore, there is no indication of the areas most likely to require cable protection. We advise that more information is resourced at the consenting stage.  Requirement to install cable protection with the minimal footprint: Natural England notes that concrete/glass reinforced plastic							-
G16	16j	protection covers have been included as an option to reduce the footprint of any cable protection. But this still has similar impacts to concrete mattresses. Therefore, given the Applicant's requirement to bury the cables options to secure surface laid cables have not been considered. We advise that this is considered further by the Application as part of the consenting phase.							
G17	161	No use of jack—up barges along export cable routes through benthic MPAs: Natural England advises further consideration of this militization measure in the operation and maintenance olan 9.9 [APP-261]  No cable protection in fisheries byelaw areas to avoid hindering reef recovery, noting that cable may still go through the outskirts of							+
G18	16m	these areas: Natural England notes that there has been no consideration of the potential fisheries byelaw areas and potential to hinder the positive environmental outcomes with Cromer Shoal MCZ that they are designed to achieve. We would welcome further consideration of this.							
G19 Broadsc	16n ale theme 6: Mitiga	Designing rock armouring to mirror the structure and function of geogenic reef. Due to the requirement to remove the cable protection at the time of decommission this is not considered a viable mitigation option for these projects.							<u> </u>
G20	17 ale Theme 7: Secon	Natural England would welcome more information on how, if required (based on the installation technique), sediment will be removeen at the exit pits), corted and redistributed. And how impacts to surrounding features can be avoided/reduced. We advise that Section 8 of the LRP-0771 MCZ Stage I assessment requires more detail and consideration of this aspect.							
G21	18	Natural England notes that secondary scouring needs further consideration in the [APP-077] Stage I MCZ assessment (para. 192, 197 and 299) in relation to impacts to sediment transportation 5.6.3 Assessment of Sea Bed Disturbance impacts from Unexploded Ordinance (UXO) Clearance							
G22	19	Natural England welcomes the consideration of ORDTER (2018) when considering the potential size of UXO detonation craters. However, we advise that further information is required in relation to the depth of any crater and the impacts this may have on any subcropoincy falls, poet and clay, in particular if chalk, eapt/clay or mixed sediment are impacted features likely to destroyed as part of							
Docume	nt Used: [APP-081]	any explosion. Limited evidence is presented to demonstrate that the structure and function will fully recover. In addition, we advise that impacts from UXO detonations are considered in-combination with Homese Project Three.	tive Oyster Beds						
		Natural England advises that the idea behind the MEEB option is sound i.e. the recreation of mixed sediment/mef epifauna communities in a new location. Natural England highlights the importance of the existing mixed sediment within the Cromer Shoal MCZ. The Cromer Shoal MCZ mixed sediment in this location has several sub features to that of the generic habitat type and there is no							
G23	20, 21, 22, 23	current requirement to restore/enhance these habitats. Natural England therefore advises against the placement of clutch and restoration of an Oytex bed in the middle of a mined sediment area. For this to be considered as additionally we advise that it would be better to extend/enhance the area of the mixed sediment on the boundary with impoverished coarse sediment e.g. in the centre of							
Docume	nt Used: [APP-083]	the 'C shaped mixed sediment area or north/south of the blue rectangle.  5.1.1 Appendix 1 in Principle Crimer Shoul Chalk Bedi (CSCI) Marine Conservation Zone (BMZ) Measures of Equivalent Environmental Natural Reginal devices that regardless of the potential project progression scenarios the size/scide of cyster bed is dependent on	Benefit (MEEB) Pla	n & [APP-084] 5.8 Strategic and Collaborative Approaches to Compensation and	Measures of Eq	sulvalent Environmental Benefit		<u> </u>	$\vdash$
G24	24, 25	restural regional audices in the trigotiums to rise potential project. Progression scenerals to the surpxiae for repair used is superiodist our ecological functionally and therefore will not change, this Statutal England econognises the time required for ecological functionally to occur and therefore would advise the implementation of oyster restoration prior to the cable installation but reflecting that it may not be fully delivering a time of cable installation. (Para 39)							
G25	26	Natural England advices that removal of anthropogenic marine debris will not provide the necessary compensation measure alione, but could form part of a package with something much more substantive or a positive Net Gain option. As with our advice to the Secretary of State (dated of January 2022) on formset Project Three, it is challenging to demonstrate that this option will offer habilat loss.							
G26	28	Natural England recommends working with local fishermen to source the clutch as has been done on previous projects (Section 8.4.3.1 of [APP-083]) and would welcome any commitment that could be made to this end.		Annandiy S. S. Sharingham Shari Nasashara Sali Salashara	iral Arress				
Docume G27	nt Used: [APP-182] 30	5.8.5 If nivronmental Statement Appendix 6.3 - Sedimentary Processes in the Cromer Shoal Chalk Beds MCZ & [APP-1831 6.3.6.4 Finns). Natural England nests the age of the data presented in APP-1821 and advises that consideration of more recent data included within other documents gives a more holistic characterisation of the site. Of particular note is the use of these data as evidence of the stable nature of the sediment along the glostic channel.	end Statemen	- опремення он = энениднанн эпозн rearsnore ∟aple Route = BGS Shallow Geolog	nual mosessment				
G28	31, 32	nature of the addiment along the glassia channel.  Natural England notes that, in some places, sediment veneer is likely to be less than Im, with 0.3 - 1.25m stated at Section 5.1.2 (APP- 132). Natural England advices that impacts to chalk should be avoided either through installation or further external cable protection. As per comments 6.6, 69 and CIO, Natural England advices that sediment veneers over chalk to constitute a subtidial chalk feature (MOS).							
		20). Natural England advises that impacts to peat and day should also be avoided from cable installation and potential cable protection.  8.1 Cable Statement			<u></u>				
G29	33	Natural England would welcome the adoption of an integrated system and therefore concurrent development. If the projects are takes forward separately then we would strongly advise the Applicant to commit to installing the cable ducts for both projects when the first project is installed as per several other local major development projects. Natural England advises that should this approach be							
Docume G30	nt Used [APP-291]	adocted then many of the transmission asset limacts will be simificantly reduced. 7. Outline Comer Shoal Chalik Beds (CSCB) Marine Conservation Zone (MCZ) Cable Specification, Installation and Monitoring Plan (CSIM) Natural England advices that prior to construction, sign off of this document should be required in consultation with the relevant SNCB	2)						
G31	35	Natural England advises that where there is shallow veneer there should be a commitment to undertake ongoing monitoring and management.							
G32	36	Natural Righand notes that the information included in Fig. 2 and supporting text (1.3.1 para 112) doesn't reflect the more detailed information in 5.3 FAPP-188 (Fig. 14. Natural Figinad notives the CSMPS a mended with the more detailed information provided in Environmental Statement IAP-1881 even the oursose of this document.  Natural Righand highlights that the calcia installation plan will meed to take into consideration potential impacts to other designated.							
G33	37	Natural rigisted highlights that the cable installation plan will need to take into consideration potential impacts to other designated sites. For example, potential distribution plansed displacement impacts to Annex (Red Throated Others and possible implications of mitigating impacts to the Greater Wash SPA. Natural Rigisted highlights the need for the implementation of adaptive management measures should monitoring demonstrate the Natural Rigisted highlights the need for the implementation of adaptive management measures should monitoring demonstrate the							_
G34	38	resource repairs inguings so are freed out of an imperient audious of against executive freedom in the above sensor infloated inguings are greater than predicted or unforsceen. Natural flegland recommends that this is incorporated into the GNDMP. See item A21 of the CO/DIMI. tab.  Natural flegland advises that monitoring will be required to inform the as yet to be agreed 5 yearly review of the Operations and							_
G35 G36	39 40	Natural Register de Land Register de Lan							+
Docume	nt Used [APP-293]	Itime. 7.72 Appendix 9.7.2 - Export Cable Burial Risk Assessment Natural England advises that standard best practice to inform the cable burial risk assessment is to undertake geotechnical							
G37	41	investigations prior to submission. However, for these projects we advise that the geotechnical and cable installation data from Dudgeon OWF is the best available evidence available. We would expect additional geotechnical data to be collected prior to cable installation to inform the necessary regulatory sign off in consultation with Natural England and this should be secured in the DCO/dMI							
ш	L	or named plan			-	1	-	<del> </del>	

Natural England's Risk and touer

Point	Point/Paragraph Number(s) from Appendix H [RR-063]	Taken from Natural England's Relevant and Written Representations SEP AND DEP Appendix H - Seascape and Landscape Visual Impact Assessment (SLVIA) - (RR-063)	RAG Status Rel and WR Rep D1	Consultation, actions, progression	RAG Status D2	Consultation, actions, progression	RAG Status D3	Consultation, actions, progression	RAG Status D4
Broads		tony Purpose of the Norfolk Coast Area of Outstanding Natural Beauty (NCADNB)*  Matural England agrees with the conclusion drawn in Para 290 of 6.1.25, [APP-111] that the effects on the statutory purpose of the NCADNB will be adverse and agrees that the effects of EEP on the statutory purpose of the NCADNB will be of a lesser extent compared to those from SEP - However, Natural England disagrees with the impact significance concluded within the 6.1.25, SNAI(APP-111) and							
Н1	11	maintains that the effects are significant and adverse.  The difference between the Applicant's judgement of impact significance on the NCAONB and Natural England's judgement of impact.							
H2	12, 13, 16f	significance has increased since the assessment within the Preliminary Environmental Information Report [PER], without any obvious judicitization from the Applicant to the Angulier at the Security Environmental Information Records and by the Applicant to the Indicative Injustic Ordinary Indications and Security Injustic Ordinary Indicative Indicative Injustic Ordinary Indicative Injustic Ordinary Indicative Injustic Ordinary Indicative Injustic Ordinary Injustic Ordinary Indicative Injustic Ordinary Injustic Ordi							
		NEADONS.  Natural England maintains that the overall potential impact from SEP and GEP on the statutory purpose of the NCADNB will be major-moderate, adverse, unacceptable, and significant in Ela terms. Natural England believes that SEP and DEP will harm the natural beauty of the NCADNB Execution.	f						
		<ul> <li>Heights of turbines mean they will be highly apparent from the NCAONB and degrade the wilderness special quality for which NCAONB was designated.</li> <li>Closest coatines to SEP and DEP combined are within NCAONB and SEP in isolation within the NCAONB and the North Norfolk</li> </ul>							
		Hentage coast (NINC).  Contrast in againer the light between turbines proposed for SEP and DEP and those at existing Offshore Wind Farms (OWF) will significantly and adversely degrade the quality of views from the AONB. The contrast will create a visually cluttered seascape when viewed from the NAONB and ANHEV.							
Н3	14, 15	<ul> <li>Presented visualisations [APP-135] to APP-132] thow a ciear curtaining effect when SEP and DEP are viewed for the NCAONB created by the joining together of the proposed projects with existing QUMF.</li> <li>The perception of wildness, remoteness, and tranquillity (QNB 6) that users of the NCAONB experience will be degraded.</li> <li>Existing wind farms have already commonwheal the satisfactory outsoon of the NCAONBs.</li> </ul>							
		<ul> <li>Existing wind farms have already compromised the statutory purpose of the NCADNBs.</li> <li>Whe further advise that would be impossible for SEP and DEP not present a further and significant impact to that which has already occurred. However we believe that the SVM conclusions do not reflect this.</li> </ul>							
Broads	cale Theme 2: " Conc	Susion of the SWA - Assessing the effects of CWF on the statutory purpose of the designated landscape?							
Н4	Point 2, 16a, 16b	Para. 76 of the SEP and DEP SLVIA [APP-111] implies that the Landscape institute's core guidance (Para. 3.35, GLVIA3) provides a threshold of impact significance in DIA terms; and that this threshold sits above "moderate significance". However, as stated in Para. 3.33 of the GLVIA3 this significance railing has no meaning in relation to the ELA Regulations. There is no single approach to assessing the							
		effects of OWFs on the statutory purpose of designated landscapes, and the GLIVAS does not provide a lead on this subject.  Matural registed agrees with Plans L1S and 152 (BPF-111), We would like to emphasize that the stretch or costative beforeign to the NGLONIs is Ca. (Skim long and contains many of the features and special qualities which mented the area's designation as an AONS. While the conclusion made in Plans 2-19 (APF-111) that 35T and GPF would not be veikelie from many areas of the AONS is correct, it							
Н5	Point 2, 16c, 16d, 16e	is also correct that extensive views of SEP and DEP will be available from the majority of the NCAONIS coastline. This conclusion could suggest that impacts on the seascape, landscape and visual resources will be minimal and could be misleading to a non-landscape specialist trying to understand the assessment.							
H6		rement for a Cumulative Impact Assessment* We advise that the Illimpact of \$F\$ and DEP on the NCAONB cannot be understood without conducting a Cumulative Impact Assessment (CAI). This CA should answer the question "What is the additional harm to the AONB from the turbines proposed by \$F\$ and DEP* and include it as those already in esistence this is a separate.							
	18d, 18e	assessment to the in-combination assessment of the ESF and DEP projects Jone and tagether, already contained within the SNA. As stated in an Sport price group (ETG) held on 1 July 2021, the CLA is required to fully consider impacts from SEP and DEP on the standor, purpose of the KCADNB.  The visualizations as spooded to ES CHADNE 25 APP 1.321 should be used to develop conclusions as the compounder of visualizations are considered to SE CHADNE.	,						
Н7	18f	The visualizations' appended to 15 chapter 2, perF-13 of 2APV-13.2 if all their to develop conclusion is the compositioning or the impact effects will direct the statutory purpose of the NCAONE. We adulte that the key policy test to the further harm to the seascape setting of the NCAONE and the consequences that this has no the already compromised statutory purpose of the NCAONE. Applicant agreed to supply test at the FOT meeting on 2AP of rehuwary 2002 defaulting a comparison between SEP and DEP and other							
H8 Broadst	18g cale Theme 4: "Rega	consonted arrays visible from the NCAONS. We note that this document is not part of ES. We advise that such a document should be included as part of the determination correct to assist the Est and the decision implement. PMPS for Energy (EN-1)** of for specific statutory purpose of nationally designated lundicages. National Policy Statement (MPS) for Energy (EN-1)** The overarching MS for EN-1 PS/Ls - SS (portifines that decisions to connect ES and DSP Endoul Amer agreed to the specific statutory.							
Н9	Point 4	purposes of nationally designated landscapes. Natural England advises that SEP and DEP will adversely affect special quality 6 of the SEADNIB: "seen of enrotmenss. Excountile, and widence (FOMB 6).  Natural Regland disagrees with the assessment of QNB 6 in Para, 509 [APP-111]. Adverse effects of existing OWRs on QNB 6 are already reported within the RACONB Management plan. SEP and CEP will add larger turbines into the seasons exting of the NaCONB. Management plan. SEP and CEP will add larger turbines into the seasons existing of the NaCONB. Management plan. SEP and CEP will add larger turbines into the seasons existing of the NaCONB. which							
н10	19b, 19c	will cause a further, and significant loss to QNB 6. The statement 'Offshore wind farms are, however, already stable from the AONB'  (Paras, 522 and 531 of the 379 and DEP SUNB [APP 11]) does not justly the further bus of a sense of remoteness, tranquellity, and wildiness from SP2 and DEP. The assessment of QNB 4 does not purely the user groups impacted.							
H11	19d	later of Ingland is uncloar about what "On's Sies would be affected to a degree" means and how much "skyglow" STP and DTP will create (Para 2-36) [PAP-111]. Further to is, there is a confirm between a statement in this 1-2 of Document #52 [APP-111] which state that STP and DTP "would not create any additional skyglow" and Para 2.59 [APP-112] which states that "Dark sixts would be affected to a degree," who note that the large Prolitico Fallation [Paractic Guidance							
		horizontal is usually to be avoided to reduce glare and sky glow <sup>2</sup> , and we note that the SEP and DEP site is on the horizon when viewed from the NCAONB. Natural England advises that the Applicant gives further consideration is to the NCAONB. Natural England is concerned that the three night-time visualisations indicate a wide expanse of light across the horizon with no clear							
H12	19e	breaks. For instance in Figure 25.21 [App-138], Figure 25.24 [APP-141] and Figure 25.26 [APP-143] where the pattern of lights appears particularly cluttered. We agree with some parts of Plan. 25 to the SVM [APP-111]. that the spread and increased height of lighting "would be more noticeable"; and that the spread of lighting across the view would be a visual issue. However, there is no indication of "if and how this can be addressed.							
Н13	19e	Natural Fingland does not understand the statement rolly where it has been judged that there would be a difference between day-times and night-time velocity has his been notified within the assessment (Planz, 2.5) of the \$2-M and EP PNAI, RePLI]. (We addise that day and night-leves are fundamentally different, not least because visual perception at night is distanted by light and diluminations rather than distance, with the perception of latter being radically altered a ringht. Hastant Englands is therefore unable to agree with justification and the perception of latter being radically altered and right. Hastant Englands is therefore unables to page with justification and the perception of latter being radically altered and perception of latter being radically a							
Broads:	cale Theme 5: "Comm	Justid by the Applicant to draw their conclusions.  The Applicant to draw their conclusions on the QNB of NCAONB*  Natural England advises that the NCAONBs Qualities of Natural Seasity (QNBs) 2, 3 and 6 (as described within the NCAONB Management Plan) will not be conserved and enhanced by \$EP and DEP and not the titll be possible to secure sufficient mitigation to counter this							
H15	Table 1 QNB2	ament. Strong and distinctive links between land and sex: Natural England's advice is that SEP and DEP should be judged on the additional impact it, would have upon the statutory purpose of the NGCONB. Natural England believes that the Sheringham Slocal array has already compromised the statutory purpose of the NGCONB. The addition of SEP and DEP into the seazage of the NGCONB. End only further							
H16	Table 1-2 QNB3	degrade the quality of the setting and by extension the NCAONR. Natural England queriers how the addition of much larger turbines, with a greater spread excross the season, and with additional lighting would allow the exessement of QRD 2 to mental nether. Diversity and integrity of landscape, seasonape and settlement character. Natural England disagrees with the applicant's RAG status of							
H17 Broadst	Table 1-2 QNB6 cale Theme 6: "Design	Amber, it suscess the RAG status should be Red. See broadcale theme coint 8 Profest 128 to 1321 for rationale. Sense of remoteress, stranguility and widners. Natural regard disagrees with the applicant's RAG statu of Amber, it suggests the RAG status should be Red. See section 4 (Picints 141 to 1111 for rationale or Or Deptic that I districtive and urique character of the local inabstrape / seasonape, including the Norfolk Coast ADNB and views out to see							
H18	Point 6 21a	Natural Refunds supports in principle the Design Objective 11 although we are uncertain as to how the design of SEP and DEP meets this objective.  Natural Refund acknowledges the changes made to the layout of the indicative turbine locations since the consultation on the Section 42 Consultation. Whit we welcome these chances we still advice that similification advice refunds certified.							
H20	21b	Natural Rogland disagrees with the statement that the NCADNB (will not be directly impacted by the proposed offstore array/ ("Para. 3.5 of the 9.25 offstore Design Statement [APP-3.21]) as no ovidence has been provided to support this statement. We would also like to clurify that SEP and DEP would be visible to the human eye between the shoreline (low water mank) and tim from the shoreline as the montages for the inland weepoints in Located within the NACONB (well beyond lain from the shorading clararly show the turbines of							
H21		SP and GP.  From a seascape perspective, Natural England supports, in principle, the layout objectives described in section 6.3.4 of the Design Statement (Document 9.26(IAPP312), Secrific comments addressed in 1876 to 1929.  Froduce visually blanced and coherent layout of furthers where see from lay viewpoints, demonstrating a good rhybm, spacing. We							
H22	Table 2 Layout objective 1	sport the objective. It would be useful for the applicant to provide a commentary or why the indicative surface, but support that the objective is worth the objective in obj							
H23	objective 2	Dudgeon and 265-330m for SEP and DEP) will in practice make this very difficult to achieve. Therefore, Natural England is unclear as to how this objective will achieved.  Achieve simple visual relationship with skyline, avoiding variable spacing and overlapping of turbines within an array or significant.							
H24	Table. 2 Layout objective 3	outlers: We support this objective, although note that this will be a difficult objective to achieve due to the extensive length of coastine from which the EF and DFF will be violed (powards of Sishn, Martarl Edignal in cutoes where the EFF and DFF PVIA (APP-11) report on this objective with respect to the visualisations provided within the ES, or whether the Applicant considers this objective met, and if so, how?							
H25	Table. 2 Layout objective 4	Achieve satisfactory visual relationship (balanced, ordered, coherent and clearly legible) with existing arrays: We support this objective, although note that the difference in height between the existing arrays and those of SEP and DEP will in practice make this very difficult to achieve. Natural or on this objective were head SEP and DEP AND [APP-111] exports on this objective with respect to the visualizations of the control of the co							
Broads	cale Theme 7: Visual	provided within the ES, or whether the Applicant considers this objection met, and if so, how?  authors showly they also 256 high furthering may appear in view for mit the EACHORS should be used to inform the EIA process "Worst Case Natural England"; advises that the impact to the statistory purpose of the NCADIR should WCSI be the option carried forwards, needs to be understood and its likely effect on the ACADIRS assessed Father, a scenario with untimies of heighth between 256 to 330m, and of a		3					
H26	23, 24a	number between 30 and 53, may also constitute an additional Worst Case Scenario.  However, we advise that visualizations of Worst Case Scenario 2 should inform the decision making process. A greater number of smaller burbless, up to 35 sturbines of 250%, would still result in a similificat adverse effect on the statutory outpook of the NCADNS.							
H27	24c	Natural England notes that the proposed substation(s) will be constructed to a height of 50m above HAT, at an unspecified distance from the coast. Natural England advise that the eninimum distance from the coast is provided which the project's core information so that its likely effects on the NACINNE can be exproprietely screened within the ELR, Further, it is unclear to Natural England welverher the							
	cale Theme 8: "Sensi	substation within the SEP project area would be larger or higher (than 50m) in the development scenario where it is the only substation to some both the SEP and DEP diffusive wind array areas. brilly of Landscape Character Types."  Natural Telginan's advice on the sensitivity of the Landscape Character Types within the coastal areas of the NCAONE sits in agreement with the horth McNACLA suckcape Character Types within the Coastal areas of the NCAONE sits in agreement with the horth McNACLA suckcape Sensitivity Assessment 2021, and in disagreement with the judgements made within the ES. Natural							
H28	Table 4	England's advice on the impact significance of SEP and DEP on these landscape types has not changed (Table 4 [RR-063]) and remain Major-Moderate, significant in EIA terms and adverse.  Natural England advices that the susceptibility of the character of Drained Coastal Marshes, Coastal Shelf, and Open Goastal Marsh is							
H29	25bi 25bii	high' for the reasons outlined within Table 5 of App. H [RR-063]]. We advise that the assessment should be updated to reflect this.  We remain in disagreement with the DEP and SEP SYNA [APP-111] judgements regarding the magnitude of effects from SEP and DEP on Drained Coastal Marshes. Coastal Side! And Deen Coastal Marsh.							
H31	25biii	Regarding the sensitivity of Drained Coastal Marshes, Coastal Shelf, and Open Coastal Marsh to SEP and DEP. Natural England is in agreement with the landscape sensitivity Judgements within Table 5.1 of the North Norfolk Landscape Sensitivity Assessment 2021. We draw the EAX's attention to the fact that the minimum turkine heights of SEP and DEP (255m) is over twice the turbine height used to							
H32	25biv	Inform the Judgments: contained within the North Morfoli Landraco Sensible Assessment 2021. We note inconsistencies in judgments on the scales of effect from SEP and DEP on landscape character. The SNA states that effects on landscape character along the Norfolic coastiller, from where SEP and DEP will be violable, would be "at most, small scale effects" (Para. 303 SEP and DEP SNA [APP-112]). This statement contradicts analyses shown within Table 25-16 (SEP and DEP SNA [APP-112]), which report up to model uncles of effects a judgment within Natural England alon disagrees with. We advise that further clarify in needed to	,						
Broads:		Its within the assessments of effects on SEP and EFF or attention to the NACADMS from the agreed representative viewpoints."  Natural regland remains in disagreement with the Applicant on the scale of effects from SEP and DEP on the Statutory purpose of the NACADMS from the spreed representative viewpoints.			<u> </u>		l		<u> </u>
Broads:	cale Theme 10: "LVIA	Landscape Baseline and Assessment." A vital mitigation measure during the construction phase, should both projects be approved, is for the onshore cabling to be installed simultaneously and not sequentially. If sequential installation is progressed then the first project must install the infrastructure for both							
H34	29	projects. The importance of the ADNB justifies the most effective mitigation being applied as is consistent with the approach agreed for East Acadia afforber windfarms.  Natural ringland advises that close attention is made to the advice of the NCADNB Partnership and relevant local authorities. These local partners have browdedge and understanding of the immediate landscape through which the cable corridor will pass.							
		and the same of th							

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Point	Point Number(s) from Appendix I 189-0621	Taken from Natural England's Relevant and Written Representations SEP AND SEP Appendix 1 - Temestrial Ecology (IRR-963)	RAG Status Rel and WR Rep D1	Consultation, actions, progression	RAG Status 02	Consultation, actions, progression	RAG Status 03	Consultation, actions, progression	RAG Status Di
Docume 11	t Used: Document Used: (APP-090) 6.1.4 Ch	ates 4 Proced Description.  The method for room company has yet to be confirmed within the Crossing Schedule. Natural England seeks to be consulted on, and be provided with all relevant evidence, for all undecladed crossing locations prior to construction commencing otherwise there is a concern state projected species may be registeried reported by the project. Natural England request that this is secured in the equilated or an obligation of the project of species and England request that this is secured in the equilated or an obligation.							
Docume	t Used: IAPP-106F 6 1.20 Chaster 20 Ornhor	Labolic los pris Licolosicu Mariasement stratego (LLLMN) document.  Ecology and Cristhology							_
		Natural England advises that in order to have confidence in mitigation measures further consideration is required within an OLEMS of:  * Motoborg and replacementation of emergency remangement measures in the event of a bestootle breakout, Natural England advises based on an assessment of potential impacts to white-clewed complish and inventibrate species.  * Reporting enclassions for all bestoots the transions within designates often should be reported to Natural England within 24 hours and							
12	4, 10, 11, 38	before clean-up operation begin, must be assessed and a validate emergency plan pair in place.  **Restanction of the Natural England shallows the IGEO composition to the Two-Opinion of the Native Wiensen is aligned restored in accordance with the New Wiensen Restoration Christian grant the New Wiensen SAC Commensation Objectives Supplementary Adulce.  **Restanction of Appropriate softgrown distinsive conditions on that user levels are continuously at or just above the grand surface.							
		broughout the year.  Modificating for bestoods broadcast strongloud ISOD broadcast his real-water successive, with a commitment to cause drilling and exact remedial insecures universities of production of the p							
									_
13	5, 33	In order to facuse proof the project and enable large term environmental gains, Natural Degland highlights the importance of the Applicant controlling to understating the followings on contribution with the 15% Endigetion Sciences for thiss, and subger and DCD CDL. In Proceedings of the Science Science (Science Science) And Application Contribution Sciences Impairs In Proceedings of Science (Science Science) Application Contribution C							
14	6	Natural England advises pre-construction surveys should ensure that a full assessment of the impacts can be made and the loss of breeding							$\vdash$
15	7	habitat for anable entring species such as sights are quantified. Further details for per-consent are required on low impacts on the loss of monting habitat case in religioned for. Natural England advisive details on integration should be provided in the CLISE data descured in the CCIS. The order limits are within 100 meters of the associates occlosion (Seweth Wood and Cathon Wood). To ensure all impacts have been fully associated to be not finderine op CLIFF confirm Wood and doubted to early stated within the CLISE with condicientation given to an associate to be not finderine op CLIFF confirm Wood and doubted to early stated within the CLISE with condicientation given to an							-
15	,	sassaster across or entraces part for Ancient was operand produce to easily stated within the LLLAN with considerating given to any potential degle effects.  Suitable mitigation measures should be put in place to minimise the impact to protected bird species during the breveling season. We advise the Applicant to commit to pre-constraints surveys to inform adoption of appropriate mitigation measures. The CLLAN broad be suptained							_
16	8,27-28,59-61	extension des productions and the second production of the second produ							
"	8,21-28,0992	inclusive) to avoid the intervaluation of the treatment of the School Special							
-		Addented Common SSS and the River Weesum are important foraging areas for several species of bats including backsatelle. Resse also see points 128 to 122 for risks and issues raised by Natural England on this matter. Natural England advises including backsatelle. Resse also see							-
17		secured by the Applicant to undertake updated pre-construction surveys where trees have been assessed as having potential to support coosting bats and are likely be impacted by the development works.							
	11	Himaliyes beham was recorded within the DCO order limits and noticed as predeminately along watercourses such as tribularies of the Weeman at Assemblighon and on the Name Tod and Elam. We add en rigigation to excit the spread of Himaliyes beham and other invasive for Names possess of Minalizes and other invasives of the Names Together dates in their practications and operations are assesses should be pair in plan during construction to minimise the risk of spreading American singuit cognition is associated cognition plane, and will the pair in plan during construction to minimise the risk of spreading American singuit cognition is associated cognition plane, and will the contract contract construction pairs in plane and Mily deliveral in the DCLIAR. Suppose Stream, Names March March Justice and Milk an							
	*	rivers are or particular concern.							
19	5, 12	Natural Tingland is asser that a dark LOM has been obtained for badger. We addies the CLOM should recove per-contraction badger survey, counting zeros with Proviously continend sets, pat the whole of the COD zeros (printing grevious) increascilla ensus) and the Olho buffer and include those sets previously recorded as disused. We addies the findings from the pre-construction surveys, to be completed within two members of submitting the lonces application should be used to desertly if any shoughts to the draft mitigation loncers requirement it required.							
120	24,58	At Deadline 1 Natural England has submitted best practice advice for mitigation measures to be adopted to mitigate disturbance impacts to the North Norfolk Coast (NNC) SA pink floated goose feature. During examination we will work with the Applicant to secure this in the DCD.							
122	15, 32	Natural England advisor all efforts to deter register from alle andre encourage register to move to adjacent sites should be implemented within the religiotion measures to reduce potential layer adject inter to register. We suggest enabligation of reductions the entire graphs from using the develoable employed in the first instance. We advise the we agreat resulpation of reductions of developing and the control of the co							
.21	40, 84								_
112	16, 50	We encause the Applicant to work alongside from into 1980 6000 to ensure militagetion covers all sense of concern and to achieve potential demonent proposals requires and shallows. We emphasise the importance of minimisers behalts to so, frequent assistance to a range of species and shallows to some of the sense we new 861 kern 127 in relation to Natural and disturbance to a range of species and habitats including breeding bolds, and buts. Please we new 861 kern 127 in relation to Natural (reginal's historicos to gother evidence from one year to build an appreciation of whether condication of the Western Woodbook 500 is							
$\vdash$		appropriate.  Due to current issues with partial and full discharges of DCO requirements ministry to separate Ecological Management Plan (EMP) and Landscape Management Plan (EMP) on the officions windown MCM, Natural England advises that the separate ECM and LMP decuments are concluded to form the Outlier Landscape (EMG) and Management EMP) (EMG) in other locations the badron on all parties and avoid							$\vdash$
		multiple consultations.							
113	17, 23, 24, 34, 45	Our Relivent/Whitzer Representation highlights a number of points we would like to see included in the OLEMS and we will review upon submission.  Natural Enthand Software per-contraction walk over surveys are carried out to salidate whether habitats have channed similicantly since the							
		Natural England advises pre-construction walk over surveys are carried out to validate whether habitats have changed significantly since the 2000 and 2012 surveys and whether protected species surveys are required with detail included in the GCLME. Natural England also recommends that the GCLMES (to be submitted with the Final OCC application) contains a commitment to post-construction surveying/incontincing for designated shabits and species that will be affected, such as hedgerows used by bats, grasheds, ponds, GCN,							
Docume	t Used: 1899-1081 6-1-72 Charter 22 Air Our	creal field margins, etc. to ensure that mitigation/hedoration measures have been be successful. If not we would advise that the onus remains on the Applicant until this is remediated by					<u> </u>		<u> </u>
154	18,25	New Werners SSS and Cohon Wood arroiser woodband are sensitive to data impacts. Cohon Wood and the unramed acroiser woodband former teterorisphany to extract set basing high greenibility. National project advances collection in needed as to whether these sites will be further impacted. The Zeros of Influence (Zio) for Ancient Woodband should be clearly stated with consideration given to any potential edge effects.							
Docume 115	t Usech TAPP-2821 6.5 Schedule of Mitteration 19	and different includes.  The control of the control							İ
116	20, 30, 57	are that conservator and sectional sequences are all sections and a section of the section and section are section are section as section are s							
126	20,40,57	potential which are to be removed or impacted upon should be included in the Schedule of Milegation and Milegation Scale Map and detailed in the Schedule of Milegation and Milegation Scale Map and detailed in the CLMSA. A DS milegation Scale will be required if fauture surveys record no evidence of that in control give tree in which recording was previously recorded.  Pre-works and point construction impligation resusures including construction exclusion zones are proposed in the inventebrate Survey Apport.  1800-731 Land or including Milegation Scale Milegatio							
117	21, 35-37	Pre-Works and polic conformation in registor in research includes a possible of conformation of the conformation of the communities to the conformation of the communities to the registering with a proposed in the inventorials valuely adaptive.  Pre-Works and produce the design of the communities to conform mobile device registering, with association being produced to the conformation of the UTC through the promotion conformation in the conformation of the UTC through the promotion conformation in the Conformation of the UTC through the promotion conformation in the Conformation of the UTC through the promotion of the UTC through the UTC t							
Docume	nt Used: [A99-302] 9.17 Outline Code of Con	Intested New Text (In the Control of							
Docume	t Used: [APP-228] 6-3-20-15 Arboricultural R	Production 1997 (20 Million) are suggested in the continuous automation in an experience in an included to interest as usuages on engagement price. And in the continuous automation in a continuous account of the Continuous accounts account accounts of the continuous accounts account accounts account accounts account accounts account account accounts account account accounts account accounts account accounts account account account accounts account account account accounts account						<u> </u>	_
119	25, 18	beyond this distance, such as the effect of air pollution from development then there may need a larger buffer zone. We advise that the							
120	26, 69	The Aboricultural Report (JAP-22II) in not an Aboricultural Impact Assessment. Natural England advises a find tree survey within the serior CO Doundary's required prior to send on the onabors cables commencing. This should highlight any accelerate them to avoid an effort and impact assessment. We advise them to a production process assessment. We advise them one opportunities are included in the CLDES and should be secured. Where management of these in required, we advise this must be completed by a qualified and extend to the CLDES and should be secured. Where management of these in required, we advise this must be completed by a qualified and extends to execute the what his not the procedure.							
Docume	t Used: [APP-128] 6.2.18 Chapter 18 Water	within veteran tree buffer zones.				<u> </u>			
121	28	Maked Degled advises that further cleary is provided in the documents provided on IGCD balances monitoring, how quickly bentsories religiously. The provided is the provided of the documents provided on IGCD balances consistency, how quickly bentsories impacts, inclinant converse as a result of the bentsories bentsories that considered with regard to improve provine which are greated in second watercoarses. Second of the provided on IGCD balances are consistent with a two regulatory of effects or create and register of maked results and consistent of the IGCD balances are consistent upon the patients in specific of an IGCD brasinal con- tention of interest and the paying highlight and their second or second registers.							
Docume	t Used: 6.2.19 Chapter 29 Land Use, Agricult	impact of moderate advense significance <sup>2</sup> as a result of increased sediment supply. We advise the potential impact of an HOD breakout on features of interest and their supporting habitats should be assessed. See item (2 above. ex and Recreation).							
122	29	The study area also crosses two Higher countryolde stawardship scheme (CSG) agreements, and ten Middle CSS agreements. We advise the Applicant must consult the landowner and, where required, the Buril Payments Agency at the earliest opportunity to discuss the impacts to schemes. Migglisch should also be provided to ensure that upones of conservation note are not underly impacted by the oppicts.							
123	40	Open cut techniques will cross several Public Rights of Way (PRUM). Though trenchiess crossing methods will be used to cross the Narialik Casstal Path 1 in noted that access restrictions may occur during the short term. Natural England queries have assurances can be made to ensure that are deliveration of recreational notes do not insent uson constructed assets or habitated assets or habitated.							
124	41,44	Miligation researes include private agreement with includement regarding any permanent bases of agricultural limit interverse, it is not claim how these private agreements will miligate for the permanent sets of the agricultural late. Militarial linguishes confirmation as no white opportunities are for additional oil militagions. Will additional per-construction surveys be understained additional infligation measures and agricultural lawsey, it determines whether the band associated with the ondrivor whether oil fidad for all the diff militagetion measures are agricultural lawsey, it determines whether the band associated with the ondrivor whether oil fidad for all the diff militagetion measures are							
125	43	summents o request intents to acceptable event.  The currislative impacts during construction on soil degradation and potential loss of soil due to encion are given as minor adverse as each project has committed to best practice mitigation. However, we encourage some communication between plans[projects to ensure							<del>                                     </del>
Docume	t Used: (APP-216) 6-3-30-3 Static Sat Detect	mbigation cown all patential area of concern from cumulative impacts.  set of Transet Stown Jespecs and 1692-7518. 2.3 to Blast Britantis Survey Separt  The crossing techniques for the area closest to Addressed Common (Beephan Read and School Read) have not been confirmed. We adult a  commitment to the colocition of faither per-construction survey data in required to better understand potential impacts to committing and							H
126	9,47	Foreign router functionally listed to the Alderhot Common SSSI posted for rousing bath) which may be impacted through open out trenchine. And to ensure that mitiestion measures remain fit for outdoor.  If it is order and notine SIMI buffer has been applied for the Monthis Blockhounthy information Sension (MSISI) data search for ham. Natural							_
127	44,53	England advises given the mobile nature of bats the proposed S0m buffer requires further justification. We query whether Core Sustemance Zones (CS) have been considered for other potentially important areas and other tast species (other than bandsatelle). Alderford Common S0S lass within 500m water of the ICO becomers with a word connectified in behavior to the ICO behaviors with a reposition.							
L		and supporting habitats should be considered and advise using CC when assessing impacts to bats and their habitats, consulting MAGIC maps to identify the presence of any protected species locines in the boundary, or within the sane of influence of the proposed desire. Natural England advises that until this is considered further by the Applicant we are unable to agree with the conclusions they have drawn.							
128	49	Natural England advisor loss of habitet preservity and hiberaristics recently for burlastative buts should be minimized, particularly in the area around the Revi Willeman, Lemada, Western Longwide, Securitypion, Regland that have been identified for the significance for important colonises of that just important foreign quit commenting groute. Please also are well & I lemal Table but in infection to the potential conflictation of Willeman Willows 2004. Together commenting ground, Please also are well & I lemal Table but infection to the potential conflictation of Williams Willows 2004. Together control in the conflictation of the colonism of the colonism of the colonism of colorism of the colorism of the colorism of colorism of the colorism of colorism of colorism of the colorism of colorism of colorism of the colorism of colorism of colorism of colorism of colorism of the colorism of colo							
-		notification of Winnum Woods SSS. Impacts must be minimised within this area to assist immunities damage to habitate and therefore species. Sufficient mitigation should be included in the OCEAS and secured with post-monitoring surveys completed.							-
129	51	Scotchwood NIII», is an important area for foraging, commuting and recessing bats, in particular bankselle in combination with the proposed Western Link. We recommend trenchless technique should be considered here to minimie impacts to important colonies of bats.							
	47, 52, 54, 55	It is unclear why the results of the bat static surveys were not used to inform assessments of three where static detector survey data suggest roots within close proximity to the OCO boundary. We addise that further clarification whether (sed if not why) areas where potential							$\vdash$
		It is it is a first in the firs							
130		roossing eass and advised that this further considered by the Applicant to ensure that the necessary militarities measures can be adopted.							
131 Docume	54 t Used: 1APP-2201 6 3 20 7 Onshore Scolore	Natural England advises per-construction but roosting surveys should consider potential impacts to existing roosts within habitants as well as tress and discussers and should include hibernation roosts. This should be secured in the CERMS.							
132 Docume	64 t Used: [APP-221] 6.2.20.8 Reptile Survey Ro	It is unclear whether the order resource used to inform the desk oudy search are includes the use of the impact this Zince layer to inform the deskion. Natural Tiginal seeks further clarification. Without this information, we are unable to have confidence in the conclusions of the Application.							
133	65	Securi regide surveys were tablect to suboptimal weather with temperatures outside of the optimal conditions and many surveys carried out to severat conditions. Several regidy were destroyed and two of the \$1 Sets surveyed states were located outside of the COO boundary. National Degland adules clarify is required regarding the completeness and validity, and therefore the robustness, of the survey data used to reform the Application. We also adules sufficient religious must be employed and decladed to the O.O.Bet.							
Docume	t Used: 6.3.30.13 Appendix 30.13 - Riparian	Asmmals (Water Vole and Otter) Survey Report							
134	68 31	Water vols prevence (water vols feeding sign) is noted near Utile Barningham along a steam. The method of crossing at this section is not detailed us open or viDC. Natural Timple neets colorfization of the type of Palatia at this awas and the crossing method from its location. Natural England advises a 10th Centruction Exclusion Zone is established/secured within 10th of the watercourse providing usitable habitat							-
Docume	t Used: TAPP-219T 6.3.20 6 Initial Biodyenih	for riseases mammals and destable in the CEENS 1989-23E.  Net Gain Assessment off  Natural England welcomes SEP and DEP's voluntary commitment to archive Biodiversity Net Cain and reminds the Applicant that the							T
136	6-6	*** Interpretation of the roots of the roots intenses with DNC additional to this. Natural England considers it is important that a landcape scale appearable is peption with a celear strategy of how measures can be delivered across as wide mass beyond the computation purchase consider of the roots. Measures to create may, restore existing and link severed or included habitats across the wider areas should be incorporated, with in Focus on weetfand and osocialant habitats. We welcome that DNC details are being considered for hebron. **Computation of the Focus on weetfand and osocialant habitats. We welcome that DNC details are being considered for hebron. ***							
		Named Signals where most Part GREP is desired you considered in other as Shared Signal with the Signal and that it is designed investing visition. The Signal Signal will not be required in the level of the control of the Signal Signa							
Addition	l issues following Relevant and Written Repr	Submission of 14 November 2022.  Natural England (NE) has included an area Jonese as Women Woodbards on a list for notactful notification as a Sta of Coprint Crisnellic.							
		Interest (ECI) consideration due to the Barbastella but colony it contains. There is evidence in the wider are to show that this is nationally important axes for the statistics (point, foreign and commanding electricity each to Direction Directory, more to Recipians, went to Swanton Morley, down to North Tuddenham and south to East Tuddenham.							
137	New Issue at D1	The including of the Westurn Moodlands 550 on the shortlist is not a commitment by NE to notify a 550, only to investigate the size further. The upstall extent of the SSS will be dependent on survey data collected by Natural England. The process in notification decision will take several years to complete.							
		Therefore is studied England advisors that is order to future proof the project, there must be no damage due to construction or operation and maintenance activities that may before creditations of the nits. Militagion as lightlighted above should be of gold standard given the importance of the six and the preserved flexibilities. More above we recognize controllation with the branched Winterman Lisk application by Miritagion activities of which the branched Winterman Lisk application by Miritagion activities with the branched Winterman Lisk application by Miritagion activities and intermediate activities activ							
		application by Norfolk County Council, noting their survey information acquired is in the public domain: https://www.norfolk.gov.id/made- and-tonapart/major-projects-and-improvement-plans/lanvich/hanvich-western-link/lanviches.							

National Signal National Logic - Standard III		

NATURAL