



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Sheringham Shoal Extension and Dudgeon Extension Offshore Wind Farms

Appendix I4 to the Natural England Deadline 3 Submission

**Natural England's Advice on the Onshore RIAA Technical Note and Addendum to
Chapter 20 Onshore Ecology and Ornithology ES [REP2-050, REP2-053]**

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

2nd May 2023

Natural England's Advice on the Onshore RIAA Technical Note and Addendum to Chapter 20 Onshore Ecology and Ornithology Environmental Statement [REP2-050, REP2-053]

Natural England has reviewed the following documents in relation to onshore ecology submitted at Deadline 2:

- [REP2-007] 2.12 Tree Preservation Order and Hedgerow Plan (Revision B)
- [REP2-023] 6.1.19.1 Environmental Statement - Chapter 19 - Land Use, Agriculture and Recreation (Revision B) (Tracked)
- [REP2-025] 6.1.20.1 Environmental Statement - Chapter 20 - Onshore Ecology and Ornithology (Revision B) (Tracked)
- [REP2-050] 14.29 Report to Inform the Appropriate Assessment (RIAA) (onshore) Technical Note
- [REP2-053] 14.32 Addendum to Environmental Statement Chapter 20 Onshore Ecology and Ornithology
- [AS-008] 2.11 Public Rights of Way (to be temporarily stopped up) Plan - Revision B

Summary

1. Natural England welcomes the submission of the above-mentioned documents by the Applicant at Deadline 2. This document sets out our comments and advice to the updated RIAA (onshore) Technical Note [REP2-050] and the Addendum to Environmental Statement Chapter 20 Onshore Ecology and Ornithology [REP2-053]. We have no further comment to the other documents at this stage.
2. Natural England is content that, with inclusion of the mitigation measures in relation to sediment management, pollution prevention and bentonite breakout identified in the Report to Inform the Appropriate Assessment Technical Note [REP2-050], that the risk of an adverse effect on the integrity of the River Wensum SAC can be sufficiently reduced. We advise the Applicant submits these mitigation measures as outline plans into examination and appropriately secure within the Outline Code of Construction Practice (OCoCP), the Outline Ecological Management Plan (EMP) and Development Consent Order (DCO). As advised in our Relevant Representation [RR-063] the bentonite breakout mitigation plan should include reporting of any bentonite breakout within or close to a designated site to Natural England within 24 hours and before clean-up operations begin.
3. In relation to the Air Quality update ES [REP2-053], several of the sites are identified as already in exceedance of a critical load or considered to be at a critical level. Therefore Natural England would expect the Applicant to assess impacts to designated site features

and/or priority habitats present that may be affected, within 200m of the construction vehicles on the road network. This is so that suitable mitigation measures can be adopted to avoid, reduce and mitigate the impacts and facilitate recovery where the impacts are temporary. These details should be included in the Outline EMP and CoCP.

Detailed Comments

14.29 Report to Inform Appropriate Assessment (RIAA), (Onshore) Technical Note [REP-050]

4. Natural England welcomes the updates provided by the Applicant in their Deadline 2 submission 14.29 RIAA (onshore) Technical Note [REP2-050]. In this document the Applicant sets out the screening in of white-clawed crayfish *Austropotamobius pallipes*, brook lamprey *Lampetra planeri* and Bullhead *Cottus gobio* features of the River Wensum SAC and the updated HRA assessment for these features.
5. This technical note provides further clarity to the Report to Inform the Appropriate Assessment (RIAA) [APP-059] regarding concerns raised in our Relevant Representation [RR063] about omission of the screening of these features. In particular, an impact pathway to these features should a bentonite breakout occur from horizontal directional drilling (HDD) across the River Wensum during the installation of the cable as part of the construction phase.
6. Natural England is content that, with inclusion of the mitigation measures in relation to sediment management, pollution prevention and bentonite breakout, that the risk of an adverse effect on the integrity of the River Wensum SAC can be sufficiently reduced. For audit trial purposes post consent we advise these measures must be appropriately included within the Outline Code of Construction Practice (OCoCP), the Ecological Management Plan (EMP) and secured within the Development Consent Order (DCO).
7. However, we advise that in addition to planned reporting to the Environment Agency, the bentonite breakout mitigation plan includes reporting of any bentonite breakout within or close to a designated site should be reported to Natural England within 24 hours and before clean-up operations begin. The Applicant intends to include this in their updated plans and we will confirm our agreement following submission into examination.
8. In addition, as outlined at Deadline 2 [REP2-063], we advised Lamprey species, including Brook Lamprey (*Lampetra planeri*), have previously been recorded within Swannington Beck. Due consideration should be given to activities which may impact on this species. Of

particular concern, either directly or indirectly, is the impact that suspended sediment increases and smothering as the result of a bentonite breakout may have on these species. As above, we welcome the intention to produce a bentonite breakout plan as stated in the 14.29 RIAA (Onshore) Technical Note, Revision A [REP2-050] and would request that mitigating the impacts of increased suspended sediment and smothering from bentonite breakouts for Lamprey at watercourse crossings such as Swannington Beck are included in this plan.

Addendum to the Environmental Statement Chapter 20, Onshore Ecology and Ornithology, Revision A [REP2-053].

9. Natural England welcomes the submission of the Addendum to the Environmental Statement Chapter 20, Onshore Ecology and Ornithology, Revision A [REP2-053]. Within this document the Applicant sets out more detailed presentation of the existing assessment of the potential effects of air quality on ecological receptors. Our detailed comments are set out in Table 1 below.

Table 1 Natural England’s comments to the effects of Air Quality on Ecological Receptors as presented in the Addendum to the Environmental Statement Chapter 20, Onshore Ecology and Ornithology, Revision A [REP2-053].

NE Ref	Page	Section/ Para	Natural England’s Concern	Natural England’s Recommendation	Risk
1	12, 15, 20, 23, 29	4.1.1.1 / 28 and 29, 4.2.1.1 / 49 , 4.3.4.1 / 85 , 4.3.7.1 to 4.3.9.4 / 103 to 118 , 4.3.16 to 4.3.18 / 152 to 169	Within these sections, a number of the screened in statutory designated nature conservation sites are already in exceedances of a critical load or at a critical level.	Natural England advises ‘temporary’ and ‘short construction period’ should be defined and/or cross referenced to the Onshore Ecology and Ornithology chapter [REP2-025]. As the sites identified are already in exceedances of a critical load or considered to be at a critical level, Natural England would expect to see the Applicant assess impacts to designated site features and/or priority habitats present that may be affected, within 200m of the construction vehicles on the road network. This is so that suitable mitigation measures can be adopted to avoid, reduce and mitigate the impacts and facilitate recovery where the impacts are temporary. These details should be included in the Outline EMP and Outline Code of Construction Practice (CoCP).	

NE Ref	Page	Section/ Para	Natural England's Concern	Natural England's Recommendation	Risk
2	15	4.2.1.1 / 49	Eight of the screened in non-statutory designated nature conservation sites are already in exceedance of their Critical Loads or Critical Level through a contribution from the Project which is >1% but less than 5.5%.	In addition to Point 1, we advise the Zones of Influence (Zol) for Ancient Woodland should be clearly stated with consideration given to any potential edge effects. We advise this is included within the OLEMS/Outline EMP and referenced in the CoCP.	
3	16	4.2.2 / 54	Five non-statutory designated nature conservation sites were screened in based on proximity to construction vehicles on the haul roads, including Smeeth Wood and Colton wood, 20m and that 100m away from a trenchless crossing.	Natural England advises inclusion of the Zol and consideration of edge effects to habitats, is included in the CoCP.	
4	23	4.3.7.1 to 4.3.9.4 / 103 to 118	Felbrigg Wood, Norfolk Valley Fens SAC, The Broads SAC and Trinity Broads SSSI have woodland qualifying features and exceedances of a Critical Load or a Critical Level through a contribution from the Project that was >1%.	In addition to Point 1, we advise the Dust Management Plan in the Outline CoCP as referenced should include suitable mitigation to ensure the habitats are protected.	
5	27	4.3.13 to 4.3.15 / 135 to 151	Natural England remains concerned as to whether there is sufficient mitigation for hedgerows with regards to air emissions. These were not provided in the OCoCP in as referred to.	Natural England advises details should be provided in the Landscape Management Plan (LMP) and Outline CoCP and should also inform tree, woodland and ancient woodland buffer zones.	

