



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES  
2010

Sheringham Shoal Extension and Dudgeon Extension Offshore Wind Farms

**Appendix G1 to the Natural England Deadline 8 Submission**

**Natural England's Advice to the Cromer MCZ Assessment and CSIMP**

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

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17<sup>th</sup> July 2023

## **Appendix G1 - Natural England's Advice to the Cromer MCZ Assessment and CSIMP**

1. Natural England has reviewed the Applicant's updates to the Stage 1 Cromer Shoal Chalk Beds (CSCB) Marine Conservation Zone (MCZ) Assessment (Revision B) and Outline Cromer Shoal Chalk Beds (CSCB) Marine Conservation Zone (MCZ) Cable Specification, Installation and Monitoring Plan (CSIMP) (Revision B) submitted at Deadline 7. We provide the following advice to the updates within these documents. However, Natural England highlights that the updates have not sufficiently addressed our concerns raised at Relevant Representations [RR-063].

### **Cromer Shoal Chalk Beds MCZ (Revision B)**

#### **1) HDD exit pit location**

2. Natural England welcomes the Applicant's mitigation measure in Table 6.3 to locate the HDD exit pit within the deep infilled channel Weybourne Channel deposits. Natural England advises that for the exit pits, significant impacts to sub cropping chalk would be mitigated. However, we also advise that this mitigation measure does not provide certainty that impacts to sub cropping chalk will be removed within the remainder of the MCZ.

#### **2) Lasting Habitat Change / Loss**

3. Natural England welcomes the updates within the documents reflecting the advice within the CSCB MCZ Conservation Advice supplementary advice on conservation objectives (SACOs) published in May 2023. However, neither the Cromer Shoal MCZ Assessment (Rev B) nor the CSIMP (Rev B) acknowledge the fact the site conservation objectives are already being hindered by other plans/projects.
4. Therefore, Natural England further advises the risk of / observed reduction in designated habitat extent which has occurred and/or is predicted to arise from the placement of offshore windfarm cable protection and oil and gas pipelines protection has meant that the Cromer MCZ features have been taken further away from meeting the sites conservation objectives. Unless these unanticipated significant adverse impacts on the site are addressed, Natural England advises that the overall coherence of the national site network as designated is at risk from a lasting habitat change/loss over the lifetime of the consented/built projects.
5. This is important context for all consents going forwards and MMO condition discharge decisions, as it substantially increases the risk that subsequent licence applications (including this Application) could result in further significant adverse impacts on the MCZ.

Natural England strongly advises that plans/projects which have the potential to significantly impact the MCZ interest features, will need to intensify their use of the mitigation hierarchy through all development phases to avoid, reduce and mitigate their impacts to a level where such effects cannot arise. Should mitigation measures not fully address the significant impacts then Measures of Equivalent Environmental Benefit (MEEB) will be required.

6. 9.4.4.3 Long Term Habitat Loss, Para 275: Natural England is not aware of any requirement for pipeline protection to be removed at the time of pipeline decommissioning, but we are aware of an intention for Carbon Capture and Under Storage to re-purpose oil and gas infrastructure. Thus, this puts in doubt the Applicant's assertion that pressures hindering the conservation objectives for the site will be reduced through pipeline decommissioning. Equally we continue to highlight that consideration of 'extent and distribution' is only one conservation objective for the site.
7. 9.4.4.3 Long Term Habitat Loss, Para 275: Please be advised, as set out by the SoS within the HP3 and Norfolk Projects decision documentation that 40 years is not considered as 'temporary', even if removed it is 'lasting'. Therefore, our advice in relation to lasting habitat change/loss as with all our advice provided within our Relevant Representation [RR-063] remains unchanged. Because impacts are likely to be lasting and site recovery could not be assured, **Natural England advises that uncertainties would likely remain regarding the impact of the proposals on the conservation objectives for the site.**

**Outline Cromer Shoal Chalk Beds (CSCB) Marine Conservation Zone (MCZ) Cable Specification, Installation and Monitoring Plan (CSIMP) (Revision B)**

8. Natural England welcomes the updates within the Cromer MCZ CSIMP Revision B.
9. 5.1.5 Para 40. Natural England welcomes the Applicant's commitment to locating the HDD exit pit within the deep infilled channel Weybourne Channel deposits and that, therefore, impacts to subcropping chalk will be avoided at this location.
10. Table 1: We note the Applicant has responded within Table 1 to clarify that "*prior to construction, sign off of this document should be required in consultation with the relevant SNCB*" and is "*secured within Condition 12(e) of Schedule 12 and 13 Draft DCO (Revision J) to be approved by the MMO prior to commencement of the works*". As such Natural England considers this issue to be resolved.

11. Table 1: In relation to monitoring of cables installed within the shallow veneer, we advise this must be committed to by the Applicant as part of any consent to this project. If there is no installation within shallow sediment veneer, then the monitoring is not enacted. Please see Natural England's advice in Appendix A3 at Deadline 8.
  
12. Table 1 and 5.5.2. Please note that what has been included is not the cable burial hierarchy which would include number of attempts to bury cable during installation, use of other tools to bury cable, full consideration of alternative cable protection options with lasting cable protection being considered as a last resort when all other options have been exhausted.