

Hornsea Offshore Wind Farm

Project Two

The Applicant's Response to Deadline VI

Application Reference: EN010053

26 November 2015

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1. Overview

- 1.1 In response to the Examining Authority's ("Ex. A") letter of 22 June 2015 (the "Rule 8 Letter"), which set the procedural timetable for the examination of the Hornsea Offshore Wind Farm Project Two application (Application Reference: EN010053) ("the Application"), Smart Wind Limited, as agent on behalf of the joint applicants Optimus Wind Limited ("Optimus Wind") and Breesea Limited ("Breesea") (together "the Applicant") has prepared the following response to Deadline VI ("the Response").

2. The Applicant's response to Interested Parties' submissions to Deadline V

- 2.1 The Applicant notes that each of Natural England, the RSPB, the MMO, the Wildlife Trusts and E.ON E&P U.K Limited made submissions to the Ex. A at Deadline V. The Applicant has provided its response to each of these submissions in Appendices A to D and Appendix H of the Response respectively.

3. Updated Development Consent Order

- 3.1 The Applicant submitted Version 6 of the draft DCO at Appendix A to its response to Deadline V. The Applicant further submitted a Schedule of Changes to the draft DCO at Appendix D of its response to Deadline V, which narrated the changes from Version 1 of the draft DCO.
- 3.2 The Applicant also submitted Version 7 of the draft DCO (Appendix E of the response to Deadline V) which showed Version 6 of the draft DCO with all of the "dead clauses" removed, together with a signposting table showing changes in clause numbering between Version 6 and Version 7 of the draft DCO (Appendix F of the response to Deadline V) for the Ex. A's ease of reference.
- 3.3 The Applicant has not provided a further update to the draft DCO within this Response, in recognition that the Ex. A is to provide its own version of the draft DCO at this Deadline. Instead, the Applicant proposes to provide a composite update to the draft DCO (Version 8) at Deadline VII.

4. Proposed refinement of the Project's Rochdale Envelope

- 4.1 As noted in the Applicant's response to Deadline V, as a result of continued discussions between the Applicant and Natural England, Natural England have advised there is no potential for an adverse effect on the integrity of the kittiwake feature from the Project alone, subject to a commitment by the Applicant to mitigate collision effects on kittiwake through a reduction in the Project's design envelope, specifically:
- 4.1.1 The removal of the 5MW wind turbine generator (WTG) option (the smallest capacity is now a 6MW WTG); and
- 4.1.2 Increasing the minimum blade tip height from 26 m relative to lowest astronomical tide (LAT) to 29.97 m relative to LAT.
- 4.2 The Applicant undertakes to make these amendments to Version 8 of the draft DCO to be submitted at Deadline VII. For reference, the full details of the proposed changes to Version 7 of the draft DCO are set out at Table 1 of Appendix G to the Response.
- 4.3 In the interim, the Applicant has provided additional clarification on the nature of the proposed amendments below.
- 4.4 Considering first the removal of the 5MW class turbine, this leaves a design envelope comprised of a turbine class range from 6–15MW. The consequence of this project mitigation is an approximate 17% reduction in the overall maximum number of turbines within the Project's envelope, from 360

to 300. The Applicant confirms that this reduction does not restrict it from maintaining the maximum generation capacity of 1,800MW. Further, the reduction does not increase the worst case scenarios presented within the Project's ES and HRA, nor alter the assessment conclusions presented therein.

- 4.5 Similarly, the Applicant confirms that the increase in the minimum distance from LAT to the lowest point of the WTG's rotating blade (from the previous 26m minimum to the increased proposed 29.97m distance), does not increase the worst case scenarios presented within the Project's ES and HRA, nor alter the assessment conclusions presented therein.
- 4.6 In further recognition of these proposed refinements to the Project's design envelope, the Applicant has prepared a summary table to identify (for each relevant EIA parameter) the effect on each of the relevant EIA conclusions (see Appendix G of the Response). The Applicant can confirm that the table illustrates that there will be a number of areas within the assessment that will result in a reduced worst case scenario (and therefore, reduction in the magnitude of the effect). The Applicant can also confirm that the mitigation commitment will not result in the prediction of any significant effects where none had previously been identified.

5. Applicant's position in relation to the Project's in-combination Kittiwake Collision Risk

- 5.1 Separate to the response to Natural England's submission to Deadline V (at Appendix D of the Response), the Applicant has also provided by way of separate appendices:
- 5.1.1 A note detailing the Applicant's position with respect to the predicted annual collision mortality arising from the Project (alone and in-combination) in relation to kittiwake – see Appendix F of the Response;
- 5.1.2 A note setting out the Applicant's summary of matters relating to the position reached with Natural England in relation to kittiwake at this Deadline, considering in particular:
- (i) A summary of Project alone mortality positions;
 - (ii) A summary of in-combination positions; and
 - (iii) Consequence of mortality,
- see Appendix E of the Response;
- 5.1.3 An updated Statement of Common Ground with Natural England in relation to Offshore Ornithology matters – see Appendix M of the Response (which includes reference to an updated "*Possible Greater Wash SPA Shadow HRA Assessment*", which is itself provided as Appendix N to the Response).

6. Update to the status of Land Agreements/Protective Provisions

- 6.1 The Applicant submitted an update as to the status of agreement in relation to the Land Agreements and Protective Provisions at Appendix O of its response to Deadline V. In the majority of cases, the position remains unchanged, but the Applicant would offer the following updates in relation to the below parties:
- 6.1.1 **VPI Immingham LLP ("VPI")** – the Applicant can confirm that agreement has been reached with VPI in relation to the form of protective provisions included for VPI's benefit at Part 8 of Schedule L to the draft DCO. By consequence, the Applicant anticipates that VPI will shortly write to PINS to confirm the withdrawal of their representations; and
- 6.1.2 **Centrica KPS Limited ("Centrica")** – the Applicant can confirm that agreement has been reached with Centrica in relation to the form of protective provisions included for Centrica's benefit at Part 7 of Schedule L to the draft DCO. By consequence, the Applicant

anticipates that Centrica will shortly write to PINS to confirm the withdrawal of their representations.