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Prof. J Glasson
The Planning Inspectorate
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BY EMAIL

10th December 2015

Dear Prof Glasson,

**Re: EN010053 Application by Smart Wind Ltd for an Order Granting
Development Consent for Hornsea Offshore Wind Farm (Zone 4) - Project Two**

The Wildlife Trusts: Reference 10031157

Further to the submission at Deadline VI by the Applicant - 'Response to The Wildlife Trusts (TWT) Deadline V Response' - we would like to clarify a number of points raised by the Applicant.

JNCC draft guidelines on thresholds

We do not agree that in our Deadline V response we '*placed considerable emphasis*' on the JNCC draft guidelines. Indeed, although they are clearly relevant, we have never relied upon them due to the fact they were only draft guidelines for consultation. However, to our knowledge, these guidelines have never been progressed beyond this stage and hence we have no further statutory guidance on what thresholds for population level impact should be. These thresholds may or may not be appropriate, as pointed out by the Applicant; however this is all we have to assess against at this time and again highlights one of many uncertainties regarding population level impacts. We would also therefore question how, in the absence of better defined and SNCB accepted thresholds, the Applicant themselves have been able to predict no population level impact with enough certainty to conclude 'no adverse effect on integrity' for the dSAC.

Availability of similar habitat (resources) for displaced animals

In its Deadline VI submission, the Applicant states that, due to the phased nature of pile driving, there would be long periods during the construction phase when animals could continue to exploit the resources within the Hornsea zone. However the extent to which this is the case is not known nor is the effect of repeated exposure to multiple pile driving events with subsequent repeated fleeing from that disturbance. This also does not appear to agree with the

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Applicant's own ES conclusions where it accepted that population levels would not return to baseline until after piling activity ceases.

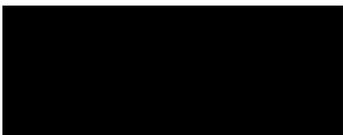
Cumulative assessment and population modelling

In its Deadline VI submission, the Applicant suggests that it is The Wildlife Trusts which are presenting the TNO report as *'the only instrument currently operational that establishes a quantitative link between disturbance and consequences for populations as a whole'*. However, to clarify and as we state in our submission, this quote is from the TNO report itself, not ourselves. As we further set out, we are fully aware of the DEPONS project and indeed the extension to the PCoD model for Natural England that the applicant references. However, neither of these tools is yet available to be run nor have provided quantified results. Therefore it is reasonable for the TNO report to state that it is currently the only *'operational'* tool to calculate the cumulative effects of disturbance at the population level.

The DEPONS project interim findings which the Applicant quotes as providing evidence of no population level effects can, by the project's own admission, only be evidence that the model itself works. They have not yet published results where they populate that model with the required parameters to produce meaningful results. Furthermore, as referenced by the Applicant, the DEPONS project has so far incorporated data from the Dan Tysk wind farm. As submitted as part of the SoCG between ourselves and the Applicant, there are elements of this data which we do not believe are representative of the situation that could occur at Hornsea; installation of turbines at Dan Tysk included bubble curtains and porpoise pingers as mitigation, therefore sound levels would have been reduced and animals deterred from the site prior to pile driving.

We therefore maintain our position as set out in our Deadline V response.

Thank you for your consideration of our submission,
Yours sincerely,



Joan Edwards

Head of Living Seas
The Wildlife Trusts