

Dear Sirs,

**Hornsea Offshore Wind Farm Project Two – Application Reference: EN010053 (the “Project”)**

SMart Wind Limited, as agent on behalf of the joint applicants Optimus Wind Limited and Breesea Limited (together the “Applicant”) has prepared the attached submission in view of the responses received from certain Interested Parties to the Secretary of State’s deadline of 13 May 2016, which were made in response to Appendix A of the Applicant’s submission to the Secretary of State on 21 April 2016. Each of these submissions was focused on the consideration of the Southern North Sea possible Special Area of Conservation (the SNS pSAC) and the Applicant considers it necessary to make this further submission to assist the Secretary of State in carrying out the Habitats Regulations Assessment in her decision making process for the Project.

Please do not hesitate to contact me should you have any queries or require any further information. Otherwise, I would be grateful for confirmation of receipt of this email and its attachment.

Yours faithfully,

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The Applicant notes the responses received from Natural England and the Joint Nature Conservation Committee (JNCC), The Wildlife Trusts (TWT), the Royal Society for the Protection of Birds (RSPB) and Whale and Dolphin Conservation (WDC) to the Secretary of State's deadline of 13 May 2016, which were made in response to Appendix A of the Applicant's submission to the Secretary of State on 21 April 2016. Each of these submissions was focused on the consideration of the Southern North Sea possible Special Area of Conservation (the SNS pSAC) in the Habitats Regulations Assessment (HRA) to be carried out by the Secretary of State in her decision making process for the Project.

In their response Natural England and JNCC quote the draft conservation objectives for the SNS pSAC, namely:

*"To avoid deterioration of the habitats of the harbour porpoise or significant disturbance to the harbour porpoise, thus ensuring that the integrity of the site is maintained and the site makes an appropriate contribution to maintaining Favourable Conservation Status for the UK harbour porpoise. To ensure for harbour porpoise that, subject to natural change, the following attributes are maintained or restored in the long term:*

- 1. The species is a viable component of the site;*
- 2. There is no significant disturbance of the species; and*
- 3. The supporting habitats and processes relevant to harbour porpoises and their prey are maintained."*

Natural England and JNCC go on to state their advice that *"there will be a likely significant effect on the SNS pSAC, and that accordingly an Appropriate Assessment is required. With regards to Hornsea Project 2 the issue under consideration is CO 2 above, concerning significant disturbance, in terms of an adverse effect on the integrity of the pSAC alone and in combination with other plans or projects. In terms of disturbance, the key impact for the Hornsea Project 2 HRA to assess is underwater impulsive noise within the SNS pSAC."*

The Applicant's submission of 21 April 2016 signposted and provided an interpretation of information previously submitted into the Hornsea Project Two examination in the context of the latest consultation material on the SNS pSAC. That submission is intended to assist the Secretary of State in carrying out an Appropriate Assessment on the basis set out by Natural England and JNCC (as quoted above). Further to its 21 April submission (and in light of subsequent responses made to the Secretary of State by others), the Applicant considers it necessary to further clarify certain important aspects.

#### *Project Alone effects*

The Applicant has set out in Table 1 of Appendix A of its 21 April response the maximum total pSAC area within which harbour porpoise avoidance behaviour may occur as a result of sequential or concurrent piling activities associated with the Project. This therefore represents (i) the maximum pSAC overlap caused by the noisiest form of piling in the Rochdale envelope operating at the "biggest impact" piling location and (ii) the maximum pSAC overlap caused by the noisiest form of piling in the Rochdale envelope operating concurrently at the two "biggest impact" piling locations. It must be remembered that:

- this maximum effect (if experienced at all) would be limited to a very short period of time (the piling activity would only last a matter of hours).
- the affected area would move (and significantly reduce) over the course of the piling window as piling activities move around the array area down to a level where there is very limited (<0.5%) overlap at all.
- the overall piling activities are also temporary in nature (a maximum duration of 1.32 years within a five year construction window, noting that this is based on an extremely precautionary assumption of pin piles taking 11.5 hours to install, as detailed in Table 4.17 of Chapter 4: Marine Mammals (Doc ref No: 7.2.4) of the ES).

The Applicant would reiterate its submissions from Section 6 of Appendix A (21 April response) and in particular would confirm that given the very limited effects from the Project alone it is considered a conclusion that there will be no significant disturbance to harbour porpoise and no adverse effect on integrity (AEoI) resulting from any design scenario considered within the Project's design envelope can be confidently reached.

### *In-combination effects*

At Section 7 of Appendix A (21 April 2016 response) the Applicant set out a list of projects which have the potential to overlap with the pSAC within the same calendar year as the Project. To explain the scale of the possible in-combination effects of each of these projects the Applicant also set out (within the footnote in Section 7) (i) the maximum overlap with the pSAC of the in-combination project with the maximum potential overlap (Dogger Bank Creyke Beck A&B) and (ii) the maximum overlap of the project with the least potential overlap (Triton Knoll) – thereby giving the range.

Following comments from Natural England and other interested parties and to elaborate upon Section 5 of Appendix Q to the Applicant's response to Deadline IV (HRA Addendum) and Section 7 of Appendix A (21 April 2016 response), the Applicant has repeated in Tables 1 and 2 below the list of projects identified as having the potential to overlap with the pSAC within the same or adjacent calendar years as the Project and has specified each respective project's average levels of overlap with the pSAC (including its summer and winter components) boundary (based on a 26km area around each individual project's respective worst case piling locations). The values are presented based on sequential piling scenarios, and also concurrent (in brackets) where this represents a potential build out scenario. To consider only the maximum overlap when characterising any given project's contribution to an in-combination effect would be wholly unrealistic (as this is representative of a single pile location only, after which all others will have a lesser effect). Average values are therefore, considered more appropriate. Notwithstanding this, Table A1 in the Appendix to this submission presents the maximum and minimum ranges for each project for context only.

Table 2 then identifies the Applicant's understanding as to the potential timing within which piling activity may take place for each identified project. The blue cells within Table 2 identify the window within which the projects' ES' identified offshore construction activity may take place. Noting that for the majority of projects piling timeframes are typically in the region of 18 to 24 months and this is likely to be the case for these future projects, rather than the large windows identified.

In both Tables 1 and 2:

- Tier 1 represents Project Two and those consented projects with a CfD, have gone through FID and have made public their intended construction timescale and are in the process of driving forward their pre-construction activities. On this basis, there can be considerable certainty that these projects will come forward.
- Tier 2 represents consented projects, which have yet to secure CfD, have not gone through FID and have not publically identified a defined construction timeframe. There is therefore, considerable doubt as to the final form (including but not limited to maximum array capacity, turbine distribution and foundation type) of these projects and the timescale over which they may actually come forward.
- Tier 3 represents those projects (in this case limited to East Anglia Three) which have submitted an application but have yet to receive consent. Accordingly, there is doubt as to whether such projects will achieve consent and considerable further doubt as to their final form and the timescale over which they may actually come forward.
- Tier 4 represents those projects that have been identified in the public domain, but have not made a consent application and have no certainty as to whether they will come forward. Indeed in the case of the E.ON seismic surveys it is not certain if or when seismic surveys will come forward (E.ON's submission at Deadline V of the Hornsea Project Two examination)

**Table 1: Average in-combination overlap with the pSAC<sup>12</sup>**

Project	Overlap of pSAC (km <sup>2</sup> )	Overlap of summer pSAC (km <sup>2</sup> )	Overlap of winter pSAC (km <sup>2</sup> )	% of pSAC	% summer pSAC	% winter pSAC
<b>Tier 1</b>						
Hornsea Project Two	<b>1033.55</b> (1497.45)	<b>1033.55</b> (1497.45)	<b>0 (0)</b>	<b>2.80%</b> (4.05%)	<b>3.83%</b> (5.54%)	<b>0.00%</b> (0.00%)
Galloper	<b>2062.1</b>	<b>0</b>	<b>2062.1</b>	<b>5.58%</b>	<b>0.00%</b>	<b>15.50%</b>
Hornsea Project One (Basecase)	<b>541.05</b>	<b>541.05</b>	<b>0</b>	<b>1.46%</b>	<b>2.00%</b>	<b>0.00%</b>
Hornsea Project One (Worst consented case)	<b>749.6</b> (801.5)	<b>749.6</b> (801.5)	<b>0 (0)</b>	<b>2.03%</b> (2.17%)	<b>2.78%</b> (2.97%)	<b>0.00%</b> (0.00%)
East Anglia ONE	<b>1058.5</b> (1502.5)	<b>139.95</b> (149.55)	<b>1058.5</b> (1502.5)	<b>2.86%</b> (4.07%)	<b>0.52%</b> (0.55%)	<b>7.96%</b> (11.29%)
<b>Tier 2</b>						
Triton Knoll	<b>47.1</b> (47.1)	<b>47.1</b> (47.1)	<b>9.45</b> (9.45)	<b>0.13%</b> (0.13%)	<b>0.18%</b> (0.18%)	<b>0.07%</b> (0.07%)
Dogger Bank Creyke Beck A&B	<b>3427.75</b> (4015.45)	<b>3427.75</b> (4015.45)	<b>231.35</b> (236.8)	<b>9.28%</b> (10.86%)	<b>12.69%</b> (14.86%)	<b>1.74%</b> (1.78%)
Dogger Bank Teesside A&B	<b>827.35</b> (1110.9)	<b>827.35</b> (1110.9)	<b>104.65</b> (105.65)	<b>2.24%</b> (3.01%)	<b>3.07%</b> (4.11%)	<b>0.79%</b> (0.79%)
<b>Tier 3</b>						
East Anglia Three	<b>1835.05</b> (2455.9)	<b>1835.05</b> (2301.35)	<b>1063.2</b> (1153.35)	<b>4.97%</b> (6.65%)	<b>6.79%</b> (8.52%)	<b>7.99%</b> (8.67%)
<b>Tier 4</b>						
E.ON seismic surveys of	243.7	243.7	0	0.66%	0.90%	0.00%

<sup>1</sup> Values presented are based on average spatial footprints. Maximum and minimum values are presented in Table A1 in Appendix A.

<sup>2</sup> Primary values are based on sequential piling, values in brackets represent concurrent piling scenarios where such construction scenario may be used.

Project	Overlap of pSAC (km <sup>2</sup> )	Overlap of summer pSAC (km <sup>2</sup> )	Overlap of winter pSAC (km <sup>2</sup> )	% of pSAC	% summer pSAC	% winter pSAC
Block 48/3						

**Table 2: Timing of in-combination projects**

Project	2016	2017	2018	2019	2020	2021	2022	Source of Information
<b>Tier 1</b>								
Galloper	**	**						Construction Method Statement (CMS) and <a href="http://www.galloperwindfarm.com/project-overview">http://www.galloperwindfarm.com/project-overview</a>
Hornsea Project One			**	**				Project press releases <sup>3</sup>
East Anglia ONE			**	**				Project press releases <sup>4</sup>
Hornsea Project Two								Figure 3.42 of Chapter 3: Project Description of the ES <sup>5</sup>
<b>Tier 2</b>								
Triton Knoll								Paragraph 5.135 of Chapter 5: Marine Mammals of the ES <sup>6</sup>
Dogger Bank Creyke Beck A&B								Table 6.1 of Chapter 5: Project Description of the ES <sup>7</sup>
Dogger Bank Teesside A&B								Table 6.1 of Chapter 5: Project Description of the ES <sup>8</sup>
<b>Tier 3</b>								
East Anglia THREE								Table 12.23 of Chapter 12 Marine Mammals of the ES <sup>9</sup>
<b>Tier 4</b>								

<sup>3</sup> <https://assets.dongenergy.com/DONGEnergyDocuments/Hornsea%20Project%20One%20newsletter%20April%202016.pdf>

<sup>4</sup> [http://content.yudu.com/web/14los/0A3z8fi/EASTANGLIA/flash/resources/index.htm?referrerUrl=http%3A%2F%2Fwww.scottishpowerrenewables.com%2Fpages%2Feast\\_anglia\\_one.asp#noRedirect](http://content.yudu.com/web/14los/0A3z8fi/EASTANGLIA/flash/resources/index.htm?referrerUrl=http%3A%2F%2Fwww.scottishpowerrenewables.com%2Fpages%2Feast_anglia_one.asp#noRedirect)

<sup>5</sup> <http://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010053/2.%20Post-Submission/Application%20Documents/Environmental%20Statement/7.1.3%20Project%20Description.pdf>

<sup>6</sup> <http://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010005/2.%20Post-Submission/Application%20Documents/Environmental%20Statement/0501%2002%20ES%20V2%20C5%20Marine%20mammals.pdf>

<sup>7</sup> [http://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010021/2.%20Post-Submission/Application%20Documents/Environmental%20Statement/6.5%20Chapter%205%20Project%20Description%20-%20Application%20Submission\\_DVD\\_F-OFC-CH-005\\_Issue\\_4.pdf](http://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010021/2.%20Post-Submission/Application%20Documents/Environmental%20Statement/6.5%20Chapter%205%20Project%20Description%20-%20Application%20Submission_DVD_F-OFC-CH-005_Issue_4.pdf)

<sup>8</sup> <http://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010051/2.%20Post-Submission/Application%20Documents/Environmental%20Statement/6.5%20ES%20Chapter%205%20Project%20Description.pdf>

<sup>9</sup> <http://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010056/2.%20Post-Submission/Application%20Documents/Environmental%20Statement/6.1.12%20Volume%201%20Chapter%2012%20Marine%20Mammal%20Ecology.pdf>

E.ON Oil & Gas seismic activity in Block 48/3								Paragraph 1.2.1 of E.ON's submission at Deadline V of the Hornsea project two examination <sup>10</sup>
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\*\* represents the defined piling timeframe. Blue shading represents the construction window within which activity (piling or oil & gas seismic survey) may occur

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<sup>10</sup><http://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010053/Events/Deadline%20-%202012-11-2015/E.ON%20E&P%20UK%20Ltd%20-%20Deadline%20Submission.pdf>

It can be seen that whilst it is impossible to predict with precision, at this stage, which of the projects identified in Tables 1 and 2 will ultimately come forward together (and in what form), it is, of course possible to consider the worst case scenario (within which each of the various permutations fall) and to secure potential mitigation which could be employed and would be effective in avoiding the Project from causing any adverse effect on integrity alone or in-combination, in any circumstance.

There is, therefore, in the Applicant's submission no impediment to the completion of a robust in-combination Appropriate Assessment as part of the Project's DCO application decision.

It is important to recognise that summing all of the average overlap areas (as presented in Table 1) will lead to artificially high results as it is, in practice, wholly unrealistic that all projects will come forward at the same time, considering:

- The existing knowledge on construction timeframes as presented in Table 2;
- The current CfD subsidy regime dictates that it is extremely unlikely that a significant number of projects will secure funding on an aligned timeline, therefore preventing an overlapping construction timescale<sup>11</sup>; and
- Supply chain constraints, preventing each of the projects identified developing concurrently (as evidenced in the Forewind response to Questions 5.4 and 5.5 as submitted by Forewind in the Teesside A & B examination in response to the Ex.A's second written questions<sup>12</sup>).

In the event that a number of projects do come forward at the same time, especially when located in proximity, there will be overlap of the spatial effect footprints within the pSAC, meaning that the overall pSAC area affected will be significantly less than the sum of the various individual project impacts.

However, even with these uncertainties which lead to exaggerated worst case figures, in the Applicant's submission it is clear that a number of the identified projects could come forward to pile at the same time as the Project (and/or soon before or after the Project) without the prospect of significant disturbance to harbour porpoise or an AEoI of the SNS pSAC.

Whilst considered to be wholly unrealistic (for the reasons set out above) the Applicant notes that it is, in theory, possible that all or most of the projects could seek to come forward to pile at the same time as the Project wishes to pile. In that scenario the Applicant considered it possible that the Secretary of State may wish to impose further controls as part of her Appropriate Assessment. It is for that reason that the Applicant proposed that the Project be subject to further control mechanisms, which would allow the application of mitigation if required.

The Applicant submits that the availability of such mitigation ensures that the Project will come forward in a way which does not cause significant disturbance to harbour porpoise (in combination) and allows a confident conclusion of no AEoI in combination.

### *Mitigation*

The Applicant notes WDC and TWT have suggested (in their submissions for the 13 May deadline) that the Applicant is advocating that the Secretary of State's Appropriate Assessment be deferred until post consent. This is clearly not the Applicant's position. The Applicant acknowledges that the Secretary of State must carry out an Appropriate Assessment prior to granting consent and the Applicant has provided information to assist with that assessment. The Applicant however noted that to account for some very unlikely scenarios, where a number of projects wish to come forward with their worst case piling proposals at the same time as the Project, it is possible that the Secretary of State may wish to

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<sup>11</sup> Noting the following statement " *the indicative timescales do not take account of the likely availability of CfD, nor the availability of installation plant. DECC has indicated that these constraints mean that the installation rate over the next five years within the Southern North Sea dSAC is unlikely to exceed 1GW p.a. (DECC, pers comm). On this basis, it is considered unlikely that the threshold for piling noise in the Southern North Sea dSAC would be exceeded within the next five years and therefore, no additional management measures would be required during this period* " as set out on Page 80-81 of Developing the Evidence Base for Impact Assessments for Recommended dSACs and dSPAs – Appendix B: Context for Marine Activities and Proposed Assessment Methods for dSACs (ABPmer, 2015)

<sup>12</sup> <http://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010051/2.%20Post-Submission/Representations/ExA%20Questions/20-11-2014%20-%20ExA%20Second%20Written%20Questions/Forewind%20-%20Response%20to%20Second%20Written%20Questions.pdf>

impose additional controls as part of her Appropriate Assessment. The purpose of the amended condition proposed by the Applicant (in its 21 April submission) was to secure that further mitigation.

As set out in the Applicant's 21 April Submission, in the unlikely event that there is a sufficient scale of in-combination activities already taking place at the time proposed by the Project for piling, such that the Project's proposed timing or methodology would be of concern, this proposed revision would allow for provision of piling restrictions, mitigations or programming restrictions. The Project could therefore come forward in a manner which avoids contributing to an adverse effect.

The Applicant considers that it is important that any condition imposed has a clear trigger for the application of mitigation. The Applicant's proposed condition wording (in its 21 April submission) was intended to provide a mechanism for confirming which elements (if any) of the available, secured mitigation package it was necessary to employ in light of the other in combination proposals being actioned at the time of signing off the plan for the Project. It was, of course, not intended to represent a "deferred" Appropriate Assessment.

The Applicant has, since its 21 April submission, worked further on a potential condition. Rather than the proposed revisions to Condition 8(2)(e) in draft Deemed Marine Licences A1-B2 (Schedules H – K of the draft DCO) as suggested by the Applicant in its 21 April submission, the Applicant would suggest the addition of a new paragraph in condition 8(2) of the draft Deemed Marine Licences A1-B2 (as paragraph (l) in DML A1 and B1 and paragraph (k) in DML A2 and B2) which the Applicant considers more clearly delivers the additional controls which the Secretary of State may wish to impose as part of her Appropriate Assessment:

Proposed new condition:

*(l/k) (i) In the event that driven or part-driven pile foundations are proposed to be used, a detailed Southern North Sea pSAC Mitigation Plan providing for appropriate mitigation, if any such mitigation is required*

*(ii) For the purposes of this paragraph (l/k) —*

*"appropriate mitigation" means such mitigation as is necessary to prevent the Project from causing an adverse affect on integrity, within the meaning of the Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007, of the Southern North Sea possible special area of conservation to the extent that marine mammals are a protected feature of the site;*

*"marine mammals" means the marine mammals listed as European Protected Species in Schedule 1 to the Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007; and*

*"Southern North Sea possible special area of conservation" means the Southern North Sea site proposed for designation as a special area of conservation for harbour porpoise and consulted on as a possible special area of conservation from January 2016 until May 2016 or, where this site becomes a European offshore marine site or a European site (as defined in regulations 15 and 24 of the Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007 respectively), that European offshore marine site or European site.*

We would further suggest that the new paragraphs as inserted be referenced within condition 8(5)(a) (for DML A1 and B1) and 8(5)(b) (for DML A2 and B2) (requiring the MMO to consult with the SNCBs on the plan).

For completeness we would also note that condition 10 of the DMLs already ensures that the undertaker comply with the plans approved under condition 8 when carrying out the licenced activities.

## Appendix A: In-combination maximum and minimum overlap with pSAC

Table A1: Maximum and Minimum Spatial Footprints

Project	Overlap of pSAC (km <sup>2</sup> )	Overlap of summer pSAC (km <sup>2</sup> )	Overlap of winter pSAC (km <sup>2</sup> )	% of pSAC	% summer pSAC	% winter pSAC
<b>Tier 1</b>						
Hornsea Project Two	Max: 1983.1 (2889) Min: 84 (105.9)	Max: 1983.1 (2889) Min: 84 (105.9)	Max: 0 (0) Min: 0 (0)	Max: 5.37% (7.82%) Min: 0.23% (0.29%)	Max: 7.34% (10.69%) Min: 0.31% (0.39%)	Max: 0.00% (0.00%) Min: 0.00% (0.00%)
Galloper	Max: 2123.7 (3540) Min: 2000.5 (2032.5)	Max: 0 (0) Min: 0 (0)	Max: 2123.7 (3540) Min: 2000.5 (2032.5)	Max: 5.75% (9.58%) Min: 5.41% (5.50)	Max: 0.00% (0.00%) Min: 0.00% (0.00%)	Max: 15.96% (26.61%) Min: 15.04% (15.28%)
Hornsea Project One (Basecase)	Max: 1073.3 Min: 8.8	Max: 1073.3 Min: 8.8	Max: 0 Min: 0	Max: 2.90% Min: 0.02%	Max: 3.97% Min: 0.03%	Max: 0.00% Min: 0.00%
Hornsea Project One (Worst consented case)	Max: 1490.4 (1583.9) Min: 8.8 (19.1)	Max: 1490.4 (1583.9) Min: 8.8 (19.1)	Max: 0 (0) Min: 0 (0)	Max: 4.03% (4.29%) Min: 0.02% (0.05%)	Max: 3.97% (5.86%) Min: 0.03% (0.07%)	Max: 0.00% (0.00%) Min: 0.00% (0.00%)
East Anglia ONE <sup>13</sup>	Max: 1134.1 (1997.8) Min: 982.9 (1007.2)	Max: 279.9 (299.1) Min: 0 (0)	Max: 1134.1 (1997.8) Min: 982.9 (1007.2)	Max: 3.07% (5.41%) Min: 2.66% (2.73%)	Max: 1.04% (1.11%) Min: 0.00% (0.00%)	Max: 8.52% (15.02%) Min: 7.39% (7.57%)
<b>Tier 2</b>						
Triton Knoll	Max: 94.2 (94.2) Min: 0 (0)	Max: 94.2 (94.2) Min: 0 (0)	Max: 18.9 (18.9) Min: 0 (0)	Max: 0.25% (0.25%) Min: 0.00% (0.00%)	Max: 0.35% (0.35%) Min: 0.00% (0.00%)	Max: 0.14% (0.14%) Min: 0.00% (0.00%)
Dogger Bank Creyke Beck A&B	Max: 4245.3 (5367) Min: 2610.2 (2663.9)	Max: 4245.3 (5367) Min: 2610.2 (2663.9)	Max: 462.7 (473.6) Min: 0 (0)	Max: 11.49% (14.52%) Min: 7.06% (7.21%)	Max: 15.71% (19.86%) Min: 9.66% (9.86%)	Max: 3.48% (3.56%) Min: 0.00% (0.00%)
Dogger Bank Teesside A&B	Max: 1525.4 (2073.9) Min: 129.3 (147.9)	Max: 1525.4 (2073.9) Min: 129.3 (147.9)	Max: 209.3 (211.3) Min: 0 (0)	Max: 4.13% (5.61%) Min: 0.35% (0.40%)	Max: 5.65% (7.68%) Min: 0.48% (0.55%)	Max: 1.57% (1.59%) Min: 0.00% (0.00%)
<b>Tier 3</b>						
East Anglia Three	Max: 2123.7 (3334.8) Min: 1546.4 (1577)	Max: 2123.7 (3025.7) Min: 1546.4 (1577)	Max: 1833.5 (1989) Min: 262.9 (317.7)	Max: 5.75% (9.02%) Min: 4.18% (4.27%)	Max: 7.86% (11.20%) Min: 5.72% (5.84%)	Max: 13.78% (14.95%) Min: 2.20% (2.39%)
<b>Tier 4</b>						

<sup>13</sup> Values are based on the use of 19km disturbance radius as utilised by EA ONE within their application documents and DECC within their subsequent Non-material change HRA in 2016

Project	Overlap of pSAC (km <sup>2</sup> )	Overlap of summer pSAC (km <sup>2</sup> )	Overlap of winter pSAC (km <sup>2</sup> )	% of pSAC	% summer pSAC	% winter pSAC
E.ON seismic surveys of Block 48/3	243.7	243.7	0	0.66%	0.90%	0.00%