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To: [East Anglia ONE North](#)
Cc: [REDACTED]
Subject: EA1N Deadline 8 - TWT Response
Date: 25 March 2021 11:59:07
Attachments: [image001.png](#)
[TWT Response EA1N Deadline 8 Mar2021.pdf](#)

Dear East Anglia ONE North Case Team,

Reference: 20024817

Please find attached The Wildlife Trusts' submission for Deadline 8. This includes:

1. TWT Comments on the Updated Offshore In Principle Monitoring Plan submitted at Deadline 6 [Annex A];
2. TWT Comments on the Updated Draft Marine Mammal Mitigation Protocol and the Updated In Principle Site Integrity Plan for the Southern North Sea Special Area of Conservation submitted at Deadline 7 [Annex B];
3. Final Statement of Common Ground [Document to be submitted by the Applicant].

Further to the above documents, we would also like to notify the Examining Authority that this is the last response that TWT intend to submit to this examination, unless otherwise required, due to the proximity of the close of the examination (6th April) and our internal working capacity.

If you require any further information, please do not hesitate to get in touch.

Kind regards,

[REDACTED]

[REDACTED] (she/her)
Marine Planning Officer
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The Wildlife Trusts reference: 20024817

BY EMAIL

25 March 2021

Dear East Anglia ONE North Case Team,

The Wildlife Trusts' response for Examination Deadline 8 Submissions for East Anglia ONE North Offshore Wind Farm.

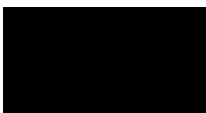
The documents TWT is submitting at Deadline 8 is as follows:

1. TWT Comments on the Updated Offshore In Principle Monitoring Plan submitted at Deadline 6 [Annex A];
2. TWT Comments on the Updated Draft Marine Mammal Mitigation Protocol and the Updated In Principle Site Integrity Plan for the Southern North Sea Special Area of Conservation submitted at Deadline 7 [Annex B];
3. Final Statement of Common Ground [Document to be submitted by the Applicant].

Further to the above documents, we would also like to notify the Examining Authority that this is the last response that TWT intend to submit to this examination, unless otherwise required, due to the proximity of the close of the examination (6th April) and our internal working capacity.

Thank you for taking our response into consideration. We are happy to provide more detail if required.

Yours sincerely



Head of Marine Conservation
The Wildlife Trusts

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Annex A – TWT Comments on the Updated Offshore In Principle Monitoring Plan

Sandeel monitoring plan

While this is not within our immediate field of interest and it has not yet been discussed in sufficient detail, TWT welcome the pre- and post- construction sandeel monitoring plan that the Applicant has committed to undertake, particularly given the uncertainty around the large size of the turbine foundations when compared to the foundations used for the Round 2 offshore windfarms. We would be keen to hear the results of this study if the Applicant is willing to share as this habitat has wider implications for prey availability in the North Sea, such as harbour porpoise.

Joint monitoring programme

We welcome the commitment by the Applicant to work with other East Anglia projects to deliver a joint monitoring programme and we would be keen to hear the results of this study.

Harbour porpoise and noise monitoring

TWT welcome the commitment to monitor harbour porpoise using passive acoustic monitoring (PAM) and we would be interested to hear about the results of ongoing harbour porpoise monitoring in the area.

However, we are still largely dissatisfied that monitoring of underwater noise levels will only occur during the construction of the first four piles. There is a missed opportunity to coordinate the harbour porpoise monitoring programme mentioned above with further underwater noise monitoring in order to have a complete and accurate picture of the impacts of the construction programme.

Annex B – TWT Comments on the Updated Draft Marine Mammal Mitigation Protocol and Updated In Principle Site Integrity Plan for the Southern North Sea Special Area of Conservation

Removal of project alone impacts

TWT welcome the amendment of the commitments within both documents to remove project alone impacts. As stated orally at ISH3 and in our Deadline 3 and 4 responses, TWT had concerns surrounding the Applicant's decision to include project alone impacts (regarding the scheduling of UXO clearance and piling) in the MMMP and SIP as this meant that the project alone impacts on site integrity of the Southern North Sea Special Area of Conservation (SAC) will be dependent on commitments to mitigation and full assessments of mitigation effectiveness that would not occur until post consent.

Therefore, TWT welcome that these commitments have been removed from the Draft MMMP and In-Principle SIP and are now secured under Condition 27 of the Generation DML and Condition 23 of the Transmission DML to *"prevent concurrent piling, concurrent UXO detonations or a combination of the two, and restricts the number of noisy events to one within a 24 hour period during the SNS SAC winter period"* as well as the statement that *"there would also be no concurrent piling or UXO clearance between the proposed East Anglia TWO and East Anglia ONE North projects."* We would like to stress that careful coordination is needed in order to ensure that these activities do not exceed the noise thresholds of the Southern North Sea SAC.

As stated in a previous response, TWT suggest to the regulators/SNCBs that it may be useful to provide guidance as to the definition of the phrase 'any given day' in the current methodology for assessing noise impacts and whether this intended to refer to a calendar day (midnight-midnight) or any 24 hour period ¹. It would be useful to clarify this to ensure consistency between future projects or scheduling of noisy activities.

Submission timescales

TWT also welcome the Applicant's commitment to produce a final detailed SIP for UXO clearance at least six months prior to UXO clearance activities being undertaken.

Impacts on the Southern North Sea SAC

We appreciate that Defra, the MMO and the Southern North Sea Regulators Working Group are taking positive steps to develop effective management for in-combination underwater noise impacts and TWT will continue to work closely with all stakeholders on this. However as stated in previous responses, as a regulatory mechanism for managing the in-combination impacts from multiple SIPs is not yet in place and is unlikely to be in place before the end of this examination, we cannot agree with the in-combination assessment conclusions of no adverse effect on the Southern North Sea SAC.

¹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/889842/SACNoiseGuidanceJune2020.pdf