

National Infrastructure Planning
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Bristol,
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Email: HornseaProjectThree@pins.gsi.gov.uk

PINS Reference: EN010080

Our Reference: 20010154

29th October 2018

Dear Sir/ Madam,

Re: EN010080 Application by Orsted Hornsea Project Three (UK) Ltd for an Order granting Development Consent for the proposed Hornsea Project Three Offshore Wind Farm

Please find below Whale and Dolphin Conservation (WDCs) response to the question issued on 9th October 2018

Q1.2.114

“Conditions 11(4) and 11(5) of the Generation Assets DML and 12(4) and 12(5) of the Transmission Assets DML [APP-027] seek to mitigate potential effects on marine mammals from piling operations. To what extent do you consider that this would be an effective approach?”

WDC Response:

We appreciate the commitment that the Applicant is making to the implementation of mitigation. We also appreciate that there is a lack of detail on the final project design which makes it difficult to determine the type of mitigation required. Our comments on the effectiveness of the proposed measures in the document above are below.

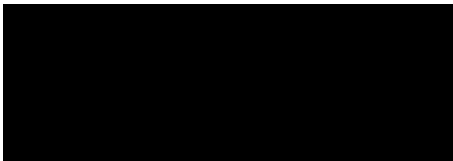
- Seasonal restriction to piling – Due to the location of Hornsea Three at just 2 km from the Southern North Sea SCI (SNS SCI), and with the cable corridor overlapping the SNS SCI, WDC would welcome restricting the piling season to reduce the impacts of construction during the summer season when harbour porpoise would be in the area of the SNS SCI. However as harbour porpoise and other cetaceans use the area throughout the year, this would need to be in-combination with other proven mitigation methods.
- Scheduling of piling, having regard to previous, ongoing and future piling associated with other offshore developments, based on an updated assessment of cumulative impacts – Due to the cumulative impacts of piling, WDC would welcome a piling schedule to reduce the potential cumulative impacts, and agree that other offshore developments need to be included. However without knowing which other activities will be considered, and as the piling schedule for other activities as well as Hornsea Three, are subject to change, it is difficult to ensure a schedule of piling that will ensure that cumulative impacts are mitigated.
- The use of alternative foundation methodologies, such as jacket foundations or gravity base foundations - WDC recommend that foundations requiring pile driving are not used due to the noise levels generated by pile driving. We would welcome the consideration of other foundations including suction buckets or floating technologies.

- *The use of noise reduction at source technologies* - WDC would welcome the use of noise reduction technologies to reduce the noise from piling activities should foundations requiring pile-driving be used. However without a commitment to which methodologies will be used it is impossible to say at this stage if these will be effective to minimise the impacts of piling activity on marine mammals. We have concerns regarding the built in mitigation based on JNCC guidelines as it is widely known that these guidelines are outdated, and do not use the latest scientific evidence (full detail in WDC's Written Representation).
- *The use of other relevant technologies or methodologies that may emerge in the future.* – WDC would welcome the consideration of developing noise mitigation methods that may develop in the future. However, as above, without a commitment to which methodologies will be used it is impossible to say at this stage if these will be effective to minimise the impacts of piling activity on marine mammals. To ensure that any mitigation methods are effective, we would like to see a commitment to ensure that only proven mitigation methods are included (full detail in WDC's Written Representation).

WDC are pleased to see the proposals to mitigate the effects on marine mammals from piling operations. Currently there is not enough detail in the proposed measures to conclude that this is an effective approach. Until the finer details of the plans are known, WDC do not agree that these measures are sufficient to mitigate potential effects on marine mammals from piling operations.

We are happy to meet to discuss any of these issues further.

Yours faithfully,



Vicki James.
Policy Officer