

**From:** [Brown, Emma \(NE\)](#)  
**To:** [Hornsea Project Three](#)  
**Cc:** [Burton, Louise \(NE\)](#)  
**Subject:** Natural England Deadline Three Submission for Hornsea Project Three  
**Date:** 14 December 2018 19:16:02  
**Attachments:** [EN\\_10080\\_NE\\_Hornsea\\_Project\\_three\\_Deadline\\_3\\_Submission\\_-\\_ISH\\_4.pdf](#)  
[EN\\_10080\\_NE\\_Hornsea\\_Project\\_three\\_Deadline\\_3\\_Submission\\_-\\_ISH\\_1\\_\(002\).pdf](#)  
[EN\\_10080\\_NE\\_Hornsea\\_Project\\_Three\\_Deadline\\_3\\_Submission\\_-\\_ISH\\_2\\_PART\\_1\\_-\\_Ornithology.pdf](#)  
[HP00066\\_101\\_HOW03\\_HiDef\\_Method\\_statement\\_20160401.pdf](#)  
[EN\\_10080\\_NE\\_Hornsea\\_Project\\_Three\\_Deadline\\_3\\_Submission\\_-\\_ISH\\_2\\_PART\\_2\\_-\\_Benthic.pdf](#)  
[EN\\_10080\\_NE\\_Hornsea\\_Project\\_Three\\_Deadline\\_3\\_Submission\\_-\\_ISH\\_2\\_PART\\_2\\_-\\_Benthic\\_Annex\\_2.2B\\_Response\\_on\\_REP2-004.pdf](#)  
[EN\\_10080\\_NE\\_Hornsea\\_Project\\_Three\\_Deadline\\_3\\_Submission\\_-\\_ISH\\_3\\_.pdf](#)

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Hello,

Please find attached Natural England's Deadline Three Submission.

This includes the following documents:

- EN 10080 NE Hornsea Project Three Deadline 3 Submission - ISH 1
- EN 10080 NE Hornsea Project Three Deadline 3 Submission - ISH 2 PART A – Ornithology
- HP00066\_101\_HOW03\_HiDef\_Method\_statement\_20160401 (Submitted as appendix 5 of ISH 2 Part 1)
- EN 10080 NE Hornsea Project Three Deadline 3 Submission - ISH 2 PART 2 – Benthic
- EN 10080 NE Hornsea Project Three Deadline 3 Submission – ISH 2 PART 2 – Benthic Annex 2.2A – Review of Applicant's response to IP response to ExA Questions – Benthic Ecology
- EN 10080 NE Hornsea Project Three Deadline 3 Submission – ISH 2 PART 2 – Benthic Annex 2.2B – Response on REP2-004
- EN 10080 NE Hornsea Project Three Deadline 3 Submission - ISH 3
- EN 10080 NE Hornsea Project Three Deadline 3 Submission - ISH 4

Kind regards,

Emma

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Please note I currently work Monday - Thursday

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THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010

HORNSEA PROJECT THREE OFFSHORE WIND FARM

Planning Inspectorate Reference: EN010080

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**NATURAL ENGLAND**  
**WRITTEN SUBMISSION FOR DEADLINE 3 – Issue Specific Hearing 2**  
**Part 2: Benthic**

**Annex 2.2B Natural England and JNCC responses to Applicant's responses to Natural England WR in relation to Benthic Ecology**

Dated 14<sup>th</sup> December 2018

**Annex 2.2B Summary of Natural England and JNCC responses to Applicant’s responses to Natural England WR in relation to Benthic Ecology which is deferred from Deadline 2 and provide support for our Oral Representation at ISH 2 Part 2 summarised for Deadline 3**

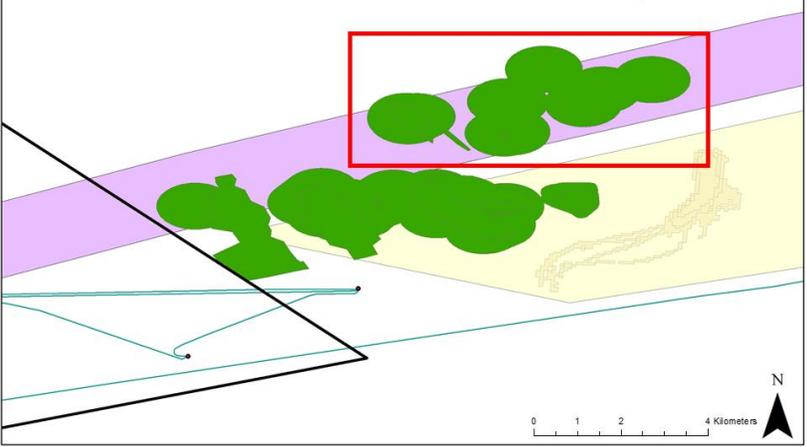
Overarching summary

Natural England’s advice provided at Deadline 1 remains unchanged and we continue to have fundamental concerns with the both the assessments that have been undertaken and significance of the conclusions drawn by the Applicant. We therefore advise that there is a high risk of significant damage (this could potentially be an adverse effect) to designated sites.

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| 1 | The Applicant is in agreement with Natural England’s comment that the ‘activities must look to minimise, as far as is practicable, damaging the established (i.e. high confidence) reef within the site’, and believes that this is consistent with the mitigation measures put forward by the Applicant for minimising impacts to Annex I reef (as outlined in the Applicant’s response to Q1.1.18 as submitted at Deadline I). | <p>We understand that changes in terminology and products are confusing in the middle of an examination, however, this must not be allowed to confuse or obscure the key message being conveyed, which is JNCC/NE’s agreement that <b>area to be managed as reef must be assessed as Annex I habitat and part of the designated features of the site.</b></p> <p>Please note that this comment was provided to the Applicant before the change of wording detailed in NE’s response to the ExQ. With our current understanding, we would now say that activities must look to minimise, as far as is practicable, damaging the area to be managed as reef within the site. We would also draw attention to NE’s ExQs where the above was followed with an important corollary – “<i>We welcome the applicant’s desire to avoid areas of higher quality reef and/or restrict cable installation to the periphery of reef features, and we consider that both of these mitigations may decrease impact on individual reefs. However, we do not consider that they will lower risk related to leaving the overall reef feature in unfavourable condition</i>”.</p> |
| 2 | However, the Applicant does not agree that this latest JNCC mapping demonstrates areas of ‘established’ or ‘high confidence’ reef within the part of the Hornsea Three offshore cable corridor that coincides with the North Norfolk Sandbanks and Saturn Reef   | <p>We are pleased that the Applicant agrees with NE/JNCC that the majority of the <i>Sabellaria</i> extent within the cable corridor has high mapping confidence or represents established reef.</p> <p>We would like to correct the Applicant’s understanding of the easternmost data points.</p> <p><b><i>Easternmost data points</i></b></p>   |

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|   | <p>SAC. This is on the basis that the easternmost data points mapped by JNCC have not been previously mapped, either by JNCC or the Applicant during the Hornsea Three characterisation surveys, and therefore do not represent an area of high confidence reef, i.e. areas where reef has been consistently recorded over a number of years.</p> | <p>The applicant is incorrect in assuming survey effort relates directly to high confidence reef<br/>Offshore; there has never been an understanding of high confidence reef equalling areas where reef has been consistently recorded over a number of years. The definition of high confidence reef is included in the SNCB methods paper for mapping reef: “<i>Broadly, areas mapped as high confidence reef are a result of surveys that used a combination of remote sensing and ground truthing and/or were specifically designed to identify Annex I habitats.</i>”<br/>(<a href="http://jncc.defra.gov.uk/pdf/20130607_AnnexI_Reef_Map_Methodology_v2.pdf">http://jncc.defra.gov.uk/pdf/20130607_AnnexI_Reef_Map_Methodology_v2.pdf</a>). We believe that the Applicant is confused with the use of high confidence reefs in the core reef methodologies, which both NE/JNCC and the Applicant agree are inappropriate for offshore assessment.</p> <p>We also suggest that the Applicant does not create new terms for reefs where there are already many. Established reef is not used in any SNCB reef guidance and its use here just serves to further confuse terminology.</p> <p>The Applicant seems to believe that <i>Sabellaria</i> reef should only be considered as evidence when mapped on more than one occasion. This is not possible offshore, where our total understanding of condition is based on sparse data that is highly uneven spatially and temporally within sites. Because of this, we continue to consider that precaution is essential when managing this Annex I feature offshore.</p> |
| 3 | <p>The Applicant refers the Ex.A to Figure 2.9 of Volume 2, Chapter 2: Benthic Ecology of the Environmental Statement (APP-062) which shows the potential future Annex I Sabellaria spinulosa reef within the Hornsea Three offshore cable corridor (i.e. the area highlighted in the Natural England Written Representation).</p>                |  |
| 4 | <p>Where the new JNCC data points overlap with the Areas E-G, reef has only been confirmed at these locations</p>   | <p>Please see (2) above concerning the Applicant’s confusion over understanding established reef.</p>  |

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| <p>during one previous survey, so is similarly not considered to represent an area of ‘established reef’. The latest data points mapped along the southern boundary of the offshore cable corridor, coinciding with potential future Annex I S. spinulosa reef Area D in Figure 2.9 of Volume 2, Chapter 2: Benthic Ecology of the Environmental Statement, is where reefs were also mapped during the original Saturn Reef survey in 2003 and the JNCC survey in 2013. This was identified as an area of higher confidence reef in Volume 2, Chapter 2: Benthic Ecology of the Environmental Statement. The Applicant acknowledges that this is an area with the greatest potential for S. spinulosa reef to be present prior to construction but would also note that Area D lies within the offshore cable corridor working area and is therefore out with the area of potential direct impact from cable installation. While the JNCC data also show additional records in the vicinity of Areas A and B, which do coincide with the Hornsea Three offshore cable corridor, the assessment presented in Table 2.21 of Volume 2, Chapter 2: Benthic Ecology demonstrates that there is sufficient space in the remaining offshore cable corridor to allow for micrositing around these features.</p> | <p>The latest version of the UK reef layer (v8) is an updated representation of our scientific evidence and opinion on extent and distribution that ensures parity between fisheries management layers and habitat mapping layers.</p> <p>We <b>agree</b> with the applicant that survey data show the ephemerality of <i>Sabellaria</i> presence within the Saturn Reef region. Because of this, we continue to consider that precaution is essential when managing this Annex I feature offshore, and disagree with the Applicant’s use of their Figure 2.9 of Volume 2, Chapter 2: Benthic Ecology of the Environmental Statement as a baseline for <i>Sabellaria</i> presence.</p> <p>We <b>disagree</b> that the Applicant’s assessment presented in Table 2.21 of Volume 2, Chapter 2: Benthic Ecology of the Environmental Statement demonstrates that there is sufficient space in the remaining offshore cable corridor to allow for micrositing around these features, and we consider that there is a significant risk of further impairment of the conservation objectives if the operations occur.</p> <p><b>Reef layers</b></p> <p><i>Availability of evidence</i></p> <p>As requested at the offshore ecology hearing, we will provide publicly available material depicting <i>Sabellaria</i> data and metadata within NNSSR for <b>Deadline 4</b>. This has previously been provided several times in graphic format to the Applicant throughout the consenting process.</p> <p><i>Extent polylines</i></p> <p>We would also like to provide further information as to the process undertaken to consider reef extent in the areas questioned by the Applicant, which we believe to be those enclosed in the red box below:</p> |
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|   |  |  <p><b>Legend</b></p> <ul style="list-style-type: none"> <li><span style="color: green;">■</span> Area to be managed as Annex I Reef DRAFT output as of 1/11/2018. Finalised layer to be available before January 2019</li> <li><span style="border: 1px solid black; display: inline-block; width: 10px; height: 10px;"></span> North Norfolk Sandbanks and Saturn Reef cSAC/SCI</li> <li><span style="background-color: #d9ead3; border: 1px solid black; display: inline-block; width: 10px; height: 10px;"></span> Aggregate production areas</li> <li><span style="background-color: #f4cccc; border: 1px solid black; display: inline-block; width: 10px; height: 10px;"></span> UK Dredging_2017</li> <li><span style="background-color: #e6e6fa; border: 1px solid black; display: inline-block; width: 10px; height: 10px;"></span> Cable_Corridor_ETRS89_v6_20180207</li> <li><span style="border-bottom: 1px solid blue; display: inline-block; width: 10px;"></span> pipeline_eab_201807</li> </ul> <p style="text-align: right; font-size: small;">JNCC @ 2018 except<br/>Cable_Corridor_ETRS89_v6_20180207 @ Orsted, aggregate production areas and UK_Dredging_2017 @ The Crown Estate 2018, pipeline_eab_201807 @ UKOilandGasData 2018</p> <p>The area in question is comprised of 500m margins around point/polyline records of reef. These records are those stemming from the 2013 Cefas/JNCC North Norfolk Sandbanks cruise. The 500m margin was made around points only where the segment was classed as “Low”, “Medium” or “High” reefiness index, as all three are intrinsically reef.</p> |
| 5 | The Applicant also queries the appropriateness of the use of a 500 m buffer around point locations of potential reef, as presented in JNCC’s latest reef layer, given that the standard approach in all SACs is to map the extent of Annex I reefs using a combination of video transects and geophysical data, in accordance with the relevant guidance | <p><b><i>Appropriateness of 500m margin</i></b></p> <p>There are several reasons why JNCC continue to find a 500m margin appropriate around reef features in this instance:</p> <p>Ecological / conservation reasons:</p> <ol style="list-style-type: none"> <li>1) The 500m margin accounts for ephemerality and movement in offshore <i>Sabellaria</i> reef through the time period likely to occur between examination process and pre-construction activities</li> </ol>  |

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|  | <p>for <i>S. spinulosa</i> reef assessment (i.e. Gubbay, 2007).</p> | <p>2) As such, the 500m margin acts as an ‘exclusion zone’ between operations and the feature, that may increase the possibility of site recovery</p> <p>Technical reasons:</p> <ol style="list-style-type: none"> <li>1) Continuation of accepted cross-industry, cross-regulator standards for offshore designated sites</li> <li>2) Paucity of evidence that aids understanding of impact and recovery</li> <li>3) Lack of understanding of scale of possible technical error in terms of installation, operation and maintenance</li> <li>4) Lack of proven mitigation for similar operations</li> </ol> <p>Given the above, and given the acceptance of such margins by both Defra and the MMO for industrial operations with North Norfolk Sandbanks and Saturn Reef SAC, we continue to consider that precaution in terms of 500m margins is essential when managing this Annex I feature offshore.</p> <p><b>Margin use in UK waters</b></p> <p>To inform fisheries management proposals, Natural England and JNCC created a joint Technical Guidance Note (“Providing management advice on MPA features – guidance on using feature data for the purposes of fisheries management including the use of buffers and margins, 4th November 2016”). This is provided here. This notes that for ephemeral habitats, <i>“the optimum approach to map ephemeral features has been to use several data sets gathered over a reasonable time series. This helps inform delineation of a core area which protects the most regular and persistent occurrences of the feature. An alternative approach, where time series data is unavailable, is to use available point data (effectively spanning a single point in time) and, where appropriate, apply a margin to that.”</i></p> <div style="text-align: center;">  <p>Marine Buffers and Margins FINAL.pdf</p> </div> |
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|   |   | <p>The 500m margins have been accepted by Defra (2018) in their fisheries management proposals.</p> <p><b>Sabellaria survey approaches (Gubbay 2007)</b></p> <p>The Applicant has misinterpreted Gubbay (2007) in terms of standard survey approaches, and how they relate to creating and buffering evidence on extent as they consider that standard survey approach in all SACs is to map the extent of Annex I reefs using a combination of video transects and geophysical data. However Gubbay (2007) shows that “A variety of survey methodologies and tools can be used to detect, map, sample and monitor Sabellaria spinulosa reefs. Guidance on what is most appropriate will depend on the definition (and therefore parameters which need to be measured) and what is practical under particular environmental conditions. ... Management proposals also need to reflect the dynamic nature of reefs which can colonise, evolve and degrade rapidly.”</p> |
| 6 | <p>The Applicant agrees with Natural England and JNCC that I Sabellaria reef does not have a wide distribution in the area and therefore is of the view that the adoption of this approach is inconsistent with this standpoint.</p>  | <p>We are pleased that the applicant has changed their opinion to agreeing with NE and JNCC that Sabellaria reef is not a common feature in the region.</p> <p>We are unsure what the Applicant means by “of the view that the adoption of this approach is inconsistent with this standpoint” and would like clarification.</p>   |
| 7 | <p>In summary, the Applicant is of the view that the latest JNCC data does not have any significant impacts for the assessment undertaken in Volume 2, Chapter 2: Benthic Ecology of the Environmental Statement.</p>   | <p>NE/JNCC disagrees with this conclusion.</p>   |
| 8 | <p>Therefore the primary mitigation which has been proposed and is as described in the Applicant’s response to Q1.1.18 as submitted at Deadline I (i.e. to undertake pre-construction surveys to delineate the extent of Annex I reefs at the time of construction and to develop</p> | <p>NE/JNCC disagrees with this conclusion.</p>   |

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|    | mitigation measures, such as micro-siting, to avoid these features) remains appropriate for ephemeral habitats such as Annex I <i>S. spinulosa</i> reef as discussed in the Applicant's response to Q1.2.20 as submitted at Deadline I.  |   |
| 9  | The proposed mitigation is consistent with the advice from Natural England and JNCC in their Written Representation and the Applicant would note that these are standard mitigation measures which have been applied, and proved to be successful, across many offshore industries, including the offshore wind industry, oil and gas (including pipelines) and interconnector cables. | <p>NE/JNCC agree that the mitigation proposed by the Applicant may decrease impact on individual reefs. However, as included in the Written Representation, we do not consider that they will lower risk related to leaving the overall reef feature in unfavourable condition.</p> <p>NE/JNCC agree that they are, in general, standard mitigation measures across industries. However, we caution that most industrial operations are not proposed with little evidence in within a SAC with a restore objective.</p>   |
| 10 | Furthermore, these mitigation measures are consistent with the measures implemented by the aggregates industry within the North Norfolk Sandbanks and Saturn Reef SAC for avoiding Annex I reefs, as outlined in JNCC (2017) 'Supplementary Advice on Conservation Objectives for North Norfolk Sandbanks and Saturn Reef Special Area of Conservation'.                               | <p>We are pleased that the Applicant has consulted our Conservation Advice package, however their comment is not evidenced by the Supplementary Advice on Conservation Objectives (SACO). In fact, the SACO in many areas disagrees with their statement: "<i>Our understanding is that the aggregate industry operates under a policy of avoiding impacting areas where S. spinulosa is found. Therefore, there is no evidence to suggest that S. spinulosa reef within the site is impacted by this specific activity.</i>"</p> <p>We also note that the aggregates industry voluntarily includes mitigation through inclusion of exclusion areas within their licenses. These exclusion areas have been larger than the 500m margins suggested as a basis by JNCC. We would be pleased to provide further information on the Area 484 exclusion zone to the Examiners.</p> |
| 11 | The Applicant also refers the Ex.A to the Applicant's response to Q1.1.17 as submitted at Deadline I, which signposts to the relevant sections of the assessment (i.e. primarily Table 2.21 of Volume 2, Chapter 2: Benthic Ecology  | NE/JNCC disagrees with this conclusion.   |

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|    | of the Environmental Statement) which demonstrates that the Hornsea Three offshore cable corridor is of sufficient width to allow for micrositing around any potential Annex I reef features which may develop prior to construction within the North Norfolk Sandbanks and Saturn Reef SAC.  |                          |
| 12 | The Applicant is also pleased to note that in paragraph 4.12 of Annex D4 of Natural England's Written Representation they 'welcome the applicant's desire to avoid areas of higher quality reef and/or restrict cable installation to the periphery of reef features' and agrees that in the unlikely event that the primary mitigation fails, this mitigation put forward by the Applicant will decrease the impact on individual reefs. | Comments provided above. |

#### Markham's Triangle

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| 1 | The Applicant notes the Natural England and JNCC comments regarding the assessment of total impacts throughout the lifetime of the project. The Applicant's position remains that a comprehensive assessment of project lifetime effects within Markham's Triangle proposed Marine Conservation Zone (pMCZ) has been undertaken and is clearly presented in both Volume 5, Annex 2.3: MCZ Assessment of the Environmental Statement (APP-104) and Volume 2, Chapter 2: Benthic Ecology of the Environmental Statement (APP-062). | We disagree that the Environmental Statement presents a clear and comprehensive assessment of project lifetime effects. |
| 2 | However, to assist, the Applicant would be able to submit a clarification to the Ex.A on this for Deadline 3, in a similar manner as done in the   | We will review once received  |

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|   | Applicant's response to Q1.2.103 as submitted at Appendix 17 to the Applicant's response to Deadline I (REP1-178).   |   |
| 3 | <p>The Applicant also notes Natural England's comment regarding the level of activity proposed by the project within Markham's Triangle pMCZ and has been working to identify where conservatism in the assessment and design envelope could be reduced. The Applicant is pleased to be able to confirm to the Ex.A and Natural England/JNCC that the result of this work is that the maximum design scenario for infrastructure to be installed within Markham's Triangle pMCZ has been reduced from 24% to 10.5%. The implications of this reduction in design envelope are substantial for the predicted extents of temporary and long term/permanent habitat loss within Markham's Triangle pMCZ. ... It should be noted that, as explained in paragraph 5.2.2.8 of Volume 5, Annex 2.3: MCZ Assessment of the Environmental Statement, the maximum design scenario for Subtidal Coarse Sediment assumes that, due to the extensive distribution of this habitat within the pMCZ, all habitat loss effects could theoretically occur entirely within this feature (i.e. all infrastructure within the pMCZ could be placed only in this feature). This is the reason why the maximum design scenario for this habitat feature is identical to the total habitat loss across the entire site (i.e. the maximum design scenarios for the three broadscale habitat features are not additive, but represent the maximum design scenario for each broadscale habitat individually). As Subtidal Sand extends over approximately 10.6% of the area of the Markham's Triangle pMCZ coinciding with the Hornsea Three array area, it is assumed that 10.6% of the maximum temporary habitat loss/disturbance could occur within this habitat. As Subtidal Mixed Sediment extends over approximately 12.95% of the area of the Markham's Triangle pMCZ coinciding with the Hornsea Three array area, 12.95% of the maximum temporary habitat loss/disturbance could occur within this habitat.</p> | <p>We are pleased that the Applicant has continued to work to reduce over-conservatism in the design envelope, and thus provided a new assessment for impact within Markham's Triangle. We are pleased to see these new overall figures for percentage impact on the protected features of the site.</p> <p><b>Assessment</b></p> <p>We understand that the values for broadscale habitats are not additive, however, we still find it extremely difficult to use the Applicant's figures to understand scenarios of impact. We expect the Applicant to provide a clear understanding of the following:</p> <ol style="list-style-type: none"> <li>1) Expected impact to each habitat <b>not</b> the maximum scenario. This will allow us to better understand impact to features. While maximum scenarios are interesting, they may not be realistic for any feature.</li> </ol> |
| 4 | The Applicant notes Natural England and JNCC's comments regarding scour and cable protection and would highlight that detailed project design information is not available at this stage and that full details of this information will be detailed in the Cable Specification and Installation Plan   | Natural England would advise that as with Triton Knoll that outline documents are provided as part of the consenting process and remain live.   |

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|   | and the Scour Protection and Management Plan which will be produced prior to construction and agreed in consultation with statutory consultees.   |  |
| 5 | The implications of this impact are considered within the assessment of colonisation of offshore foundations and scour and cable protection within Markham's Triangle pMCZ as presented in paragraph 5.2.3.22 et seq. of Volume 5, Annex 2.3: MCZ Assessment of the Environmental Statement (APP-104). This includes consideration of localised changes to benthic habitats from shell debris as noted in Natural England and JNCC's comment. The conclusion of this assessment considers that any changes would be highly localised to the immediate vicinity of the offshore structures within the Hornsea Three array area (see paragraph 5.2.3.28 of Volume 5, Annex 2.3: MCZ Assessment of the Environmental Statement). | We do not consider it appropriate to assess impact to a pMCZ by providing a reference to a non-comparable study in Sweden. |

Annex D7 – Relevant sections relating offshore sections not raised at the ISH

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| 1 | Therefore, in summary, it is the Applicant's understanding that there is now agreement between Natural England and the Applicant that both the Hornsea Three array area and offshore cable corridor have been adequately characterised for the purposes of undertaking the Environmental Impact Assessment (EIA). | Please note that Appendix D7 only related to the nearshore characterisation and relates only to the Application and not subsequent information. Appendix D1 believe that there is sufficient for characterisation for Wash and North Norfolk Coast SAC but not allay our concerns about the significance of the impacts to designated features. JNCC disagrees that there is adequate characterisation offshore |
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Annex D2 - Cable Protection Clarification Note – Only considered relevant parts relating to issues not raised in hearing. However, in reviewing this there is several references to the RIAA therefore we refer the examiner to Natural England concerns with the HRA conclusions provided at Appendix D5 provided for Deadline 1

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| 1 | It is therefore concluded with high confidence that the basis and results of the assessments are valid for the full range of environmental settings | Natural/JNCC disagree with the statement |
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|   | considered for Hornsea Three, including both SACs  |  |
| 2 | The examples provided within the clarification note review were drawn exclusively from the Applicants projects, as this type of information (i.e. the amounts of cable protection placed on developer assets) is not typically publicly available and therefore it was not possible to use examples from other offshore wind developers.   | Noted  |
|   | The JNCC caveat at the start of Pidduck et al. (2017) was noted and accounted for in the clarification note, which considers a wider range of evidence and the applicability of that evidence to a wider range of environmental settings. Pidduck et al. (2017) is included as it was the only contemporary and available study of its type found regarding the possible impacts of rock dump on Annex I sandbanks in the North Norfolk Sandbanks and Saturn Reef SAC. | Noted. We appreciate the Applicant using contemporary studies to inform their assessments.   |
|   | The Applicant refers the Ex.A and Natural England to its response to paragraph 3.8 in Annex D4 of Natural England's Written Representation (REP1-217).   | Noted. Comment provided above.   |
|   | The Applicant would clarify that although references such as Coolen (2017) may discuss the positive effects of cable protection, the installation of cable protection for Hornsea Three has not been assessed by the Applicant as  | We appreciate the Applicant referencing Coolen (2017) etc. in their documentation, and we are considering whether the results of the Dutch studies are applicable to situations involved in this application. However, at this present moment in time our advice remains unchanged |

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|  | <p>a positive effect within Volume 2, Chapter 2: Benthic Ecology of the Environmental Statement (APP062). The purpose of referencing sources such as Coolen (2017) in the Cable Protection Clarification Note (REP1-138), was to provide evidence to support the use of sensitive cable protection measures within designated sites to facilitate ecological functioning in areas of cable protection, as was requested by Natural England in their Relevant Representation (RR-097). The Applicant's would note that, as set out in paragraph 5.20 of the Cable Protection Clarification Note (REP1-138), the purpose of this paper was to provide evidence that the cable protection measures proposed for Hornsea Three would allow for some continued ecological functioning following deployment of this material, whilst acknowledging that this material does constitute the introduction of alien material into the marine environment.</p> |   |
|  | <p>The Applicant would also refer the Ex.A to paragraph 2.11.2.4 of Volume 2, Chapter 2: Benthic Ecology (APP-062) which notes that the assessment is considered to be equivalent to the Intersessional Correspondence Group on Cumulative Effects (ICGC) pressure "Physical loss (permanent change):</p>   | <p>We would welcome engagement with the Applicant outwith this process to ensure that future descriptions of pressures are valid and match up with ICGC standard lists.</p> |

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|  | Physical change (to another seabed type) |  |
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