

From: [Dominika Phillips](#)
To: [Kay Sully](#); [KJ Johansson](#); [Hornsea Project Three](#)
Cc: [Andrew Guyton](#); [Stuart Livesey](#)
Subject: Hornsea Project Three (UK) Ltd response to Deadline 5 (Part1)
Date: 23 January 2019 21:00:57
Attachments: [image003.png](#)
[D5_HOW03_Appendix_1_Transport_Assessment_Appendix_G.pdf](#)
[D5_HOW03_Appendix_2_Preliminary_Trenching_Assessment.pdf](#)
[D5_HOW03_Appendix_3_OCSIP.pdf](#)
[D5_HOW03_Appendix_4_ISH2_ornithology_clarifications.pdf](#)
[D5_HOW03_Appendix_5_Migratory_Seabirds_Clarification.pdf](#)
[D5_HOW03_IP_WR.pdf](#)
[D5_HOW03_SoComm.pdf](#)
[HOW03_Guide_to_the_application.pdf](#)
[HOW03_Shell_Position_Statement.pdf](#)
[HOW03_SOCC_MCA_V1_3.pdf](#)
[HOW03_SoCG_NNDC_January_2019_D5_version.pdf](#)

Dear Kay, K-J

We are pleased to enclose Ørsted Hornsea Project Three (UK) Ltd (“the Applicant”) response to Deadline 5, Wednesday 23rd Jan 2019. These documents have been prepared by the Applicant and have been produced in response to the Examining Authority’s (ExA) letter of 9 October 2018 (“the Rule 8 letter”).

These documents are being issued over a series of emails, each email containing a pdf file or files. The **last** email to be issued by the Applicant will contain a supporting file tracking sheet – to help the ExA ensure that it has received each email transmission.

Please acknowledge safe receipt of these documents.

If we can be of any assistance in that regard, please do not hesitate to contact myself or Andrew Guyton.

Best regards,
Dr Dominika Chalder PIEMA
Environment and Consent Manager



Environmental Management UK | Wind Power
5 Howick Place | London | SW1P 1WG



Please consider the environment before printing this e-mail

This communication contains information which is confidential and is for the exclusive use of the addressee(s).

If you are not a named addressee, please inform the sender immediately and also delete the communication from your system.

Ørsted Power (UK) Limited is registered in England
Registered number: 04984787
Registered Address: 5 Howick Place, London, SW1P 1WG
The Company is a wholly owned subsidiary of Ørsted A/S (a company registered in Denmark)
More information on the business of the Ørsted group can be found at www.ørsted.com
Disclaimer version 1.1

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

Hornsea Project Three
Offshore Wind Farm



Hornsea Project Three Offshore Wind Farm

Appendix 3 to Deadline 5 Submission - Outline Cable Specification and Installation Plan

Date: 23rd January 2019

Document Control			
Document Properties			
Organisation	Ørsted Hornsea Project Three		
Author	RPS, GoBe Consultants, Ørsted		
Checked by	Felicity Browner		
Approved by	Andrew Guyton		
Title	Appendix 3 to Deadline 5 Submission – Outline Cable Specification and Installation Plan		
PINS Document Number	n/a		
Version History			
Date	Version	Status	Description / Changes
23/01/2019	A	Final	Submitted at Deadline 5 (23/01/2019)

Ørsted

5 Howick Place,

London, SW1P 1WG

© Orsted Power (UK) Ltd, 2019. All rights reserved

Front cover picture: Kite surfer near a UK offshore wind farm © Ørsted Hornsea Project Three (UK) Ltd., 2019.

Table of Contents

1. Outline Cable Specification and Installation Plan	1
2. Structure of the CSIP	2
3. Cable Burial and Protection Decision Making Process	2
4. Outline Sandwave Clearance Plan	5
Overview	5
Outline Document Structure	5
Monitoring and future management	8
5. Outline Cable Protection Plan	8
Overview	8
Outline Document Structure	9
Consultation	10
Monitoring and future management	14

List of Figures

Figure 3.1: Draft consultation process on Cable Specification and Installation Plan and indicative timelines.	4
Figure 4.1: Outline Sandwave Clearance Plan consultation with indicative timelines.	7
Figure 5.1: Outline consultation plan on cable crossings with indicative timelines.	12
Figure 5.2: Outline consultation plan for cable burial and remedial cable protection with indicative timelines.	13

1. Outline Cable Specification and Installation Plan

- 1.1 The Applicant has considered the submissions made to date (both in writing and orally) from Natural England with regard to their concerns relating to Hornsea Three sandwave clearance (as part of site preparation), cable burial and cable protection matters within designated sites.
- 1.2 One of the key messages that the Applicant has taken from these submissions is the need to provide Natural England with as much clarity as possible as to how and when detailed information relating to the Hornsea Three cable installation process (inclusive of any site preparation and/or protection works) will come forward and how the specific activities are controlled within the Development Consent Order (DCO), so that they can have greater confidence in the Applicant's assumptions relating to site preparation, cable burial and deployment of cable protection measures.
- 1.3 The Applicant notes that the existing Transmission Assets Deemed Marine Licence (dML) includes a number of conditions that will trigger the need for the provision of this information to the MMO for approval prior to the commencement of works. The principal post consent plan where this information will be presented in detail will be the Cable Specification and Installation Plan (CSIP). To facilitate greater clarity with specific regard to sandwave clearance and also cable protection, the Applicant is proposing that the CSIP will include two sub-plans in the form of a Sandwave Clearance Plan and a Cable Protection Plan where these activities occur within existing designated sites (i.e. North Norfolk Sandbanks and Saturn Reef Special Areas of Conservation (SAC), the Wash and North Norfolk Coast SAC and the Cromer Shoal Chalk Beds Marine Conservation Zones (MCZ)).
- 1.4 At Deadline 4, the Applicant submitted a revised draft DCO (REP4-003) which commits to the following (see Schedule 11, Part 2, Condition 13(1)(h) and Schedule 12, Part 2, Condition 14(1)(h)):
- (h) a cable specification and installation plan, to include—*
- (i) technical specification of offshore cables below MHWS, including a desk-based assessment of attenuation of electro-magnetic field strengths, shielding and cable burial depth in accordance with industry good practice;*
 - (ii) a sandwave clearance plan for all designated sites affected, including details of the volumes of material to be dredged, timing of works, locations for disposal and monitoring proposals;*
 - (iii) a detailed cable laying plan for the Order limits, incorporating a burial risk assessment encompassing the identification of any cable protection that exceeds 5% of navigable depth referenced to Chart Datum and, in the event that any area of cable protection exceeding 5% of navigable depth is identified, details of any steps (to be determined following consultation with the MCA) to be taken to ensure existing and future safe navigation is not compromised or similar such assessment to ascertain suitable burial depths and cable laying techniques, including cable protection;*
 - (iv) a cable protection plan for all designated sites where cable protection is required, including details of the volumes, material, locations and seabed footprints for cable protection measures, where required, consideration of alternative methods of protection and monitoring proposals;*
 - (v) proposals for the volume and areas of cable protection to be used for each cable crossing; and*

(vi) proposals for monitoring offshore cables including cable protection during the operational lifetime of the authorised project which includes a risk based approach to the management of unburied or shallow buried cables, and, where necessary, details of micrositing through any European Site.

1.5 This document serves as an Outline Cable Specification and Installation Plan, and presents detail on:

- The structure of the CSIP;
- Cable burial and protection decision making process;
- Outline content of the Sandwave Clearance Plan for designated sites; and
- Outline content of the Cable Protection Plan for designated sites.

1.6 The Applicant would welcome discussion with Natural England on the content of the outline CSIP and related plans at this stage, to ensure in principle this meets the reasonable requirements of Natural England and JNCC in management of the relevant designated sites.

2. Structure of the CSIP

2.1 It is proposed that the CSIP would be developed in line with standard industry approach to the CSIP documentation and therefore, adopt the following structure (noting the inclusion of the sandwave clearance and cable protection plans):

- 1) Introduction;
- 2) Project Context;
- 3) Scope and Objectives of the CSIP;
- 4) Scope of the CSIP;
- 5) Statements of Compliance;
- 6) Updates and Amendments to the CSIP;
- 7) Technical Specifications of Cables;
- 8) EMF Attenuation Study;
- 9) Cable Burial Risk Assessment (CBRA);
- 10) Sandwave Clearance Plan;
- 11) Cable Laying Plan and Installation Methodology; and
- 12) Cable Protection Plan.

3. Cable Burial and Protection Decision Making Process

3.1 The Applicant has made clear throughout its submissions and responses to interested parties that use of cable protection is considered a last resort to ensuring asset integrity, and that burial of cable will always be the preferred protection solution, as this provides the best protection for cables (see section 3 of the Cable Protection in Designated Sites clarification note; REP1-138).

- 3.2 The Applicant acknowledges that it will be important, particularly within the areas where the cables intersect with designated sites, for there to be ongoing dialogue between the Project and the relevant Statutory Nature Conservation Bodies (SNCBs) as the CSIP is developed. It is proposed that an Ecological Clerk of Works (ECoW) will be responsible for ensuring this coordinated approach to the development of the plan. The ECoW will be to be the main point of contact for SNCBs throughout the pre-construction, construction and post-construction phases of the project. The ECoW will form an interface between the Hornsea Three engineering and consents teams, as well as briefing contractors to ensure compliance with the DCO and any further measures agreed through this plan.
- 3.3 To aid Natural England at this stage the Applicant has sought to map out the typical stages of the development of the CSIP and identify how and where it may be sensible for engagement between both parties to occur, and this is reflected within Figure 3.1. As indicated in Figure 3.1 below, further detail on SNCB consultation relating to sandwave clearance activities and cable protection installation are outlined in Figure 4.1, **Error! Reference source not found.** and **Error! Reference source not found.**, although the two key stages of pre-construction consultation with SNCBs as outlined in Figure 3.1 are as follows:
- **Consultation to inform contractor tendering:** To be undertaken prior to contractor appointment and once a complete CBRA has been produced. This will enable SNCBs to provide feedback to be incorporated into the contractor ITT documents, if appropriate. As indicated in Figure 3.1, full site specific survey data may not be available at this point, but this would allow SNCBs to provide input into the tendering process, emphasising the high level of attention to be placed on cable installation within designated sites and providing guidance on the principles for environmental protection for inclusion in tender documentation.
 - **Pre-installation Consultation:** This phase of consultation would be undertaken following contractor appointment and detailed design. Consultation would be led by the project ECoW, with key contacts from Ørsted engineering and consents and installation contractors (e.g. environmental compliance officer, if appropriate) also in attendance. The purpose of this consultation would be to inform contractor planning of installation campaigns and ensure all environmental considerations are properly communicated to contractors.
- 3.4 Sections 4 and 5 provide further detail on consultations to be undertaken and information provided during these consultations, in relation to sandwave clearance and cable protection. It would be expected that these would form part of the consultation outlined in Figure 3.1, to ensure a holistic and coherent strategy. The Applicant would welcome discussion with the MMO and SNCBs on the most efficient and effective consultation strategy.

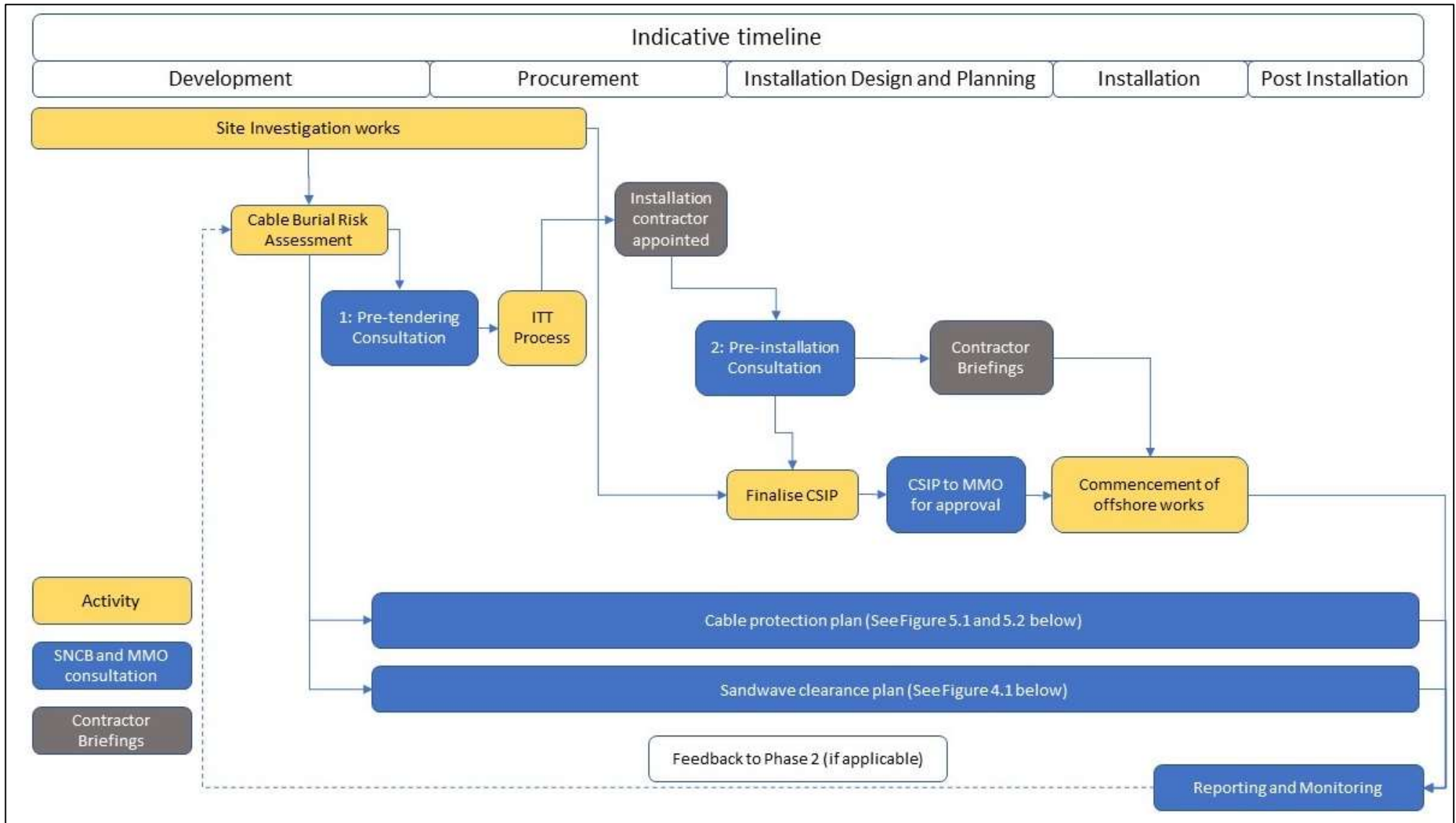


Figure 3.1: Draft consultation process on Cable Specification and Installation Plan and indicative timelines.

4. Outline Sandwave Clearance Plan

Overview

- 4.1 This document will be a live document which will relate to sandwave clearance activities within designated sites. This document has been drafted following comments within the Natural England and JNCC Relevant Representation (RR-097) that a robust project plan should be provided, defining clear project parameters for Hornsea Three sandwave clearance activities within the North Norfolk Sandbanks and Saturn Reef SAC. The purpose of this document will ultimately be to demonstrate compliance with the consent with regard to the extent, nature and location of any sandwave clearance activity within designated sites, but will also:
- Facilitate proactive and advance communication between Hornsea Three and the SNCBs with regard to sandwave clearance activities and associated monitoring within designated sites throughout all stages of cable installation;
 - To ensure that the any sandwave clearance activities and associated disposal within designated sites are reported to SNCBs in an auditable and timely manner, within limits set out in the DCO, Environmental Statement and the Report to Inform Appropriate Assessment (RIAA).
- 4.2 This will ensure SNCBs have a full and real time understanding of cable installation activities particularly within designated sites, allowing them to manage activities within the sites and gain a better understanding of the effects of these activities on designated features. Accordingly, clear distinction will be made within the Sandwave Clearance Plan for clearance activity planned with each individual designated site. This could then be used by the relevant SNCB to provide evidence-based advice on future operations within the relevant designated site.

Outline Document Structure

- 4.3 It is proposed that the Sandwave Clearance Plan will contain information on:
- The maximum design scenario presented within the Environmental Statement, RIAA and the DCO;
 - The location, timing and methodology of any proposed sandwave clearance works (and associated disposal activity);
 - The context of the proposed clearance works in relation to the relevant designation features, including:
 - NNSR SAC: Annex I sandbanks;
 - NNSR SAC: Annex I reefs;
 - WNNC: Annex I sandbanks and relevant sub-features (Subtidal Sand, Subtidal Mixed Sediments and Subtidal Coarse Sediments); and
 - WNNC: Annex I reefs.
 - Roles and responsibilities and key contacts (noting the prominent role of the ECoW); and
 - Communication procedures and timescales.

Consultation

- 4.4 Consultation on the clearance proposals will centre around:
- Presentation of final ground model based on site specific pre-construction geophysical and geotechnical data obtained from the pre-construction site investigation works;
 - Details of locations where sandwave clearance is required to install cable below reference seabed level;
 - Expected volumes of sediment to be dredged and disposed;
 - Proposed locations for disposal, including:
 - Consideration of Annex I features/sub-features (including avoidance of Annex I reefs);
 - Proximity to dredge location.
 - Mechanisms for communication to contractors emphasising the need to act with care and minimise seabed impacts within designated sites. To include toolbox talks, provision of accurate shapefiles for key habitats (e.g. reefs);
 - Discussion of contractor briefings, which may include agreed thresholds with reference to maximum design scenarios and DCO commitments;
 - Monitoring proposals for sandwave clearance, including consideration of recovery of cleared sandwaves and disposal areas if within designated sites.
- 4.5 The consultation process with SNCBs and contractors, with indicative timelines, is shown in Figure 4.1 (Note: consultation events would be aligned with those set out in Figure 3.1 to ensure a holistic and coherent approach across the project). All consultation with SNCBs and contractors will be led by the Hornsea Three ECoW.

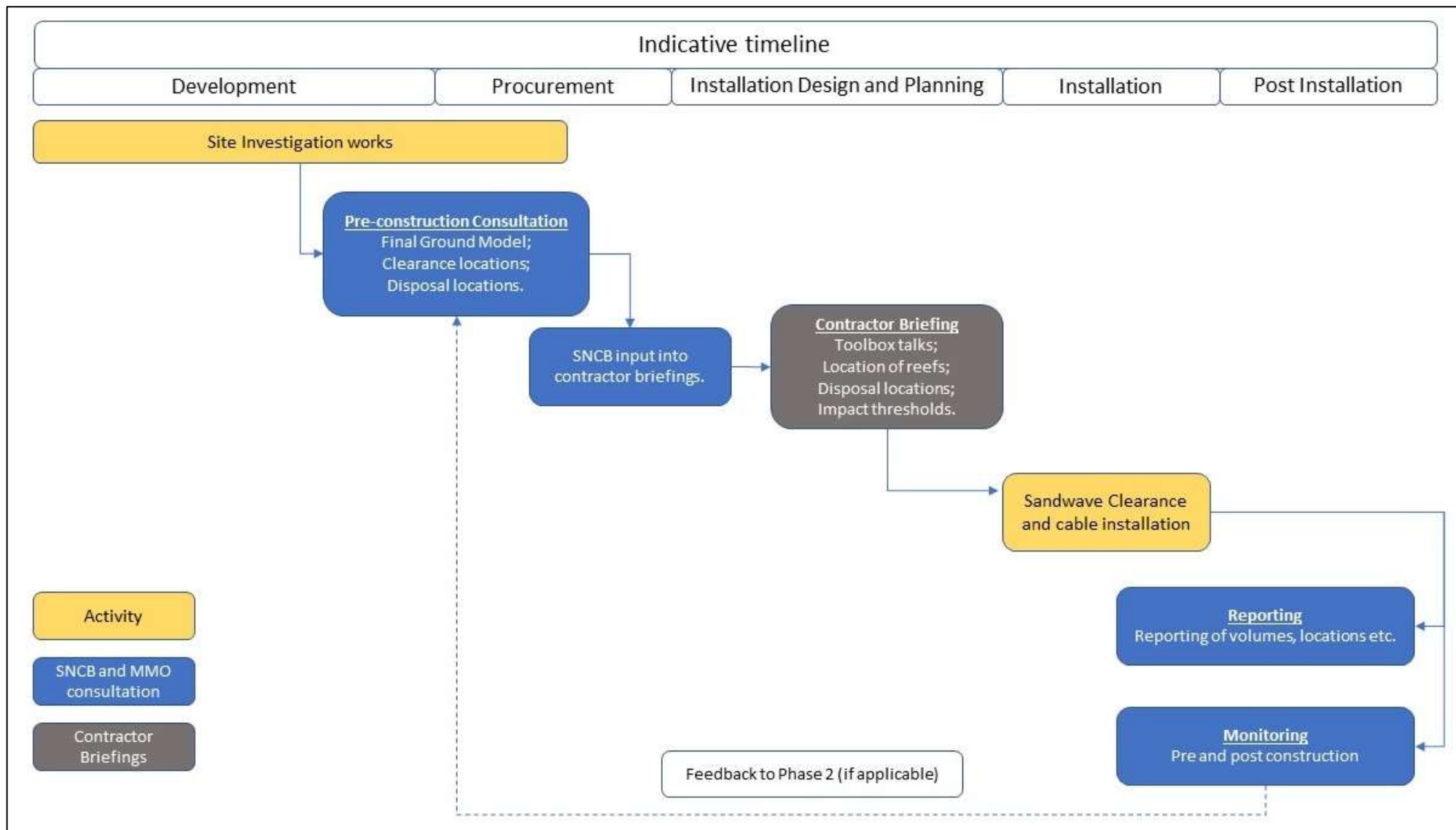


Figure 4.1: Outline Sandwave Clearance Plan consultation with indicative timelines.

Reporting and compliance

- 4.6 Details of actual sandwave clearance activities to be reported as soon as possible following clearance and disposal activities undertaken within designated sites, referring back to the limits stated in the maximum design scenario and DCO and will include confirmation on the:
- Volume of material dredged;
 - Footprint of dredging;
 - Locations of dredge disposal.

Monitoring and future management

- 4.7 Post construction monitoring within each designated site will be reported to the relevant SNCB, with reports and data provided to SNCB in a format which best allows them to understand the effects on the designated features. This is in line with the Conservation Objectives of the North Norfolk Sandbanks and Saturn Reef SAC, i.e. Table 1 of the Supplementary Advice on Conservation Objectives (SACO): Annex I Sandbanks slightly covered by seawater all the time states: *JNCC advise a restore objective which is based on expert judgment; specifically, our understanding of the feature's sensitivity to pressures which can be exerted by ongoing activities i.e. oil and gas sector activities and cabling. Our confidence in this objective would be improved with longer term monitoring and access to better information on the activities taking place within the site.*
- 4.8 The proposals within this plan would help the relevant SNCB to better understand the effect of sandwave clearance activities within the relevant designated site. This could be used by the SNCB to provide evidence based advice on future operations within the designated site based on site specific information, including likely timescales for recovery following dredge/disposal, preferred locations for disposal etc.

5. Outline Cable Protection Plan

Overview

- 5.1 This document will be a live document which will relate to installation of cable protection measures within designated sites. The purpose of this document will ultimately be to demonstrate compliance with the consent with regard to the extent, nature and location of any cable protection activity, within designated sites but will also:

- Facilitate proactive and advance communication between Hornsea Three and the Statutory Nature Conservation Bodies (SNCBs) with regard to cable burial and the use of cable protection measures with particular reference to designated sites, throughout all stages of cable installation and post installation;
- Allow for decisions relating to cable protection measures to be clearly communicated to SNCBs early in the process to facilitate timely and efficient approval of other post consent plans (e.g. cable specification and installation plan and construction method statement) with the MMO; and
- To ensure that the any cable protection placed within designated sites is reported to SNCBs in an auditable manner, within limits set out in the DCO, Environmental Statement and the RIAA.

5.2 This will ensure SNCBs have a better understanding of cable protection requirements particularly within designated sites, allowing them to manage activities within the sites and gain a better understanding of the effects of these activities on designated features. Accordingly, clear distinction will be made within the Cable Protection Plan for clearance activity planned with each individual designated site. This could then be used by the relevant SNCB to provide evidence-based advice on future operations within the relevant designated site.

5.3 It is intended that the Cable Protection Plan will be a live document as it relates to cable protection measures associated with crossings (which will be specified pre-construction) and remedial protection which may be required following cable installation (discussed further below). The version submitted at the point of approval will cover, as far as reasonably practicable, the likely need for any remedial cable protection (e.g. indicated by the areas where burial may be challenging) and the measures taken to minimise the risk of insufficient cable burial in these areas. It should be noted, however, that it will not be possible to identify all areas where remedial burial will be required and therefore this component will need to be revisited during construction where any refinements to the approved plan are required.

Outline Document Structure

5.4 It is proposed that the Cable Protection Plan will contain information on:

- The maximum design scenario presented within the DCO, Environmental Statement and the RIAA.
- The location, volume and footprint of any cable protection measures within designated sites;
- The context of the proposed cable protection measures in relation to the relevant designation features, including:
 - NNSR SAC: Annex I sandbanks;
 - NNSR SAC: Annex I reefs;
 - WNNC: Annex I sandbanks and relevant sub-features (Subtidal Sand, Subtidal Mixed Sediments and Subtidal Coarse Sediments).
 - WNNC: Annex I reefs.

- Roles and responsibilities and key contacts (noting the prominent role of the ECoW); and
- Communication procedures and timescales.

5.5 It is proposed that the Cable Protection Plan will distinguish between any protection required for the crossing of existing assets (e.g., cables and or pipelines), and remedial cable protection requirements.

5.6 The consultation process with SNCBs and contractors, with indicative timelines, is shown in Figure 5.1 for crossings and Figure 5.2 for remedial protection (Note: consultation events would be aligned with those set out in Figure 3.1 to ensure a holistic and coherent approach across the project). All consultation with SNCBs and contractors will be led by the Hornsea Three ECoW.

Consultation

Pre-construction consultation – Design of crossings

5.7 Consultation relating to the need for cable protection associated with the crossing of existing assets will focus on providing clarity on matters including (see Figure 5.1):

- Asset to be crossed and operator;
- Proximity to assets;
- Location of rock protection and features affected;
- Type of protection – type and grain sizes;
- Volume of rock protection;
- Area of seabed affected by crossing (with reference back to DCO commitments); and
- Mechanisms for communication with contractors emphasising the need to act with care and minimise seabed impacts within designated sites as much as practical. To include toolbox talks, provision of accurate shapefiles for key habitats (e.g. reefs) and agreed thresholds for when work stops are required, with reference to maximum design scenarios and DCO commitments;
- Monitoring proposals (focusing on effects on sediment transport and colonisation of protection material) where cable protection is placed within designated sites.

Pre-construction consultation – Remedial Cable Protection

5.8 Consultation relating to the need for cable protection associated with any remedial cable protection will focus on the following areas (see Figure 5.2 and Figure 3.1):

- Presentation of final ground model based on site specific pre-construction geophysical and geotechnical data within SAC to inform likely risk of any remedial cable protection;
- Discussion of the cable laying plan and installation methodology;
- Identify risks which may result in insufficient burial and mitigation taken to minimise the requirement for use of cable protection;
- Proposals for remedial burial operations, if required; and
- Mechanisms for communication to contractors as outlined above for crossings.

Post construction – Remedial Cable Protection

5.9 Should burial (and remedial burial) fail, consultation on the specific cable protection measures to be used within designated sites will be required during the construction phase (see Figure 5.2). This consultation will comprise:

- Presentation of measures taken to ensure burial and demonstrate that all other options have been exhausted;
- Specific locations and volumes of cable protection material required;
- Possible alternatives to rock protection;
- Clarification with regard to any changes required to the existing Cable Protection Plan and how the specific requirements relate to the DCO limits and worst case assumptions within the Environmental Statement and RIAA; and
- Any updates to the monitoring proposals (focusing on effects on sediment transport and colonisation of protection material) where cable protection is placed within designated sites.

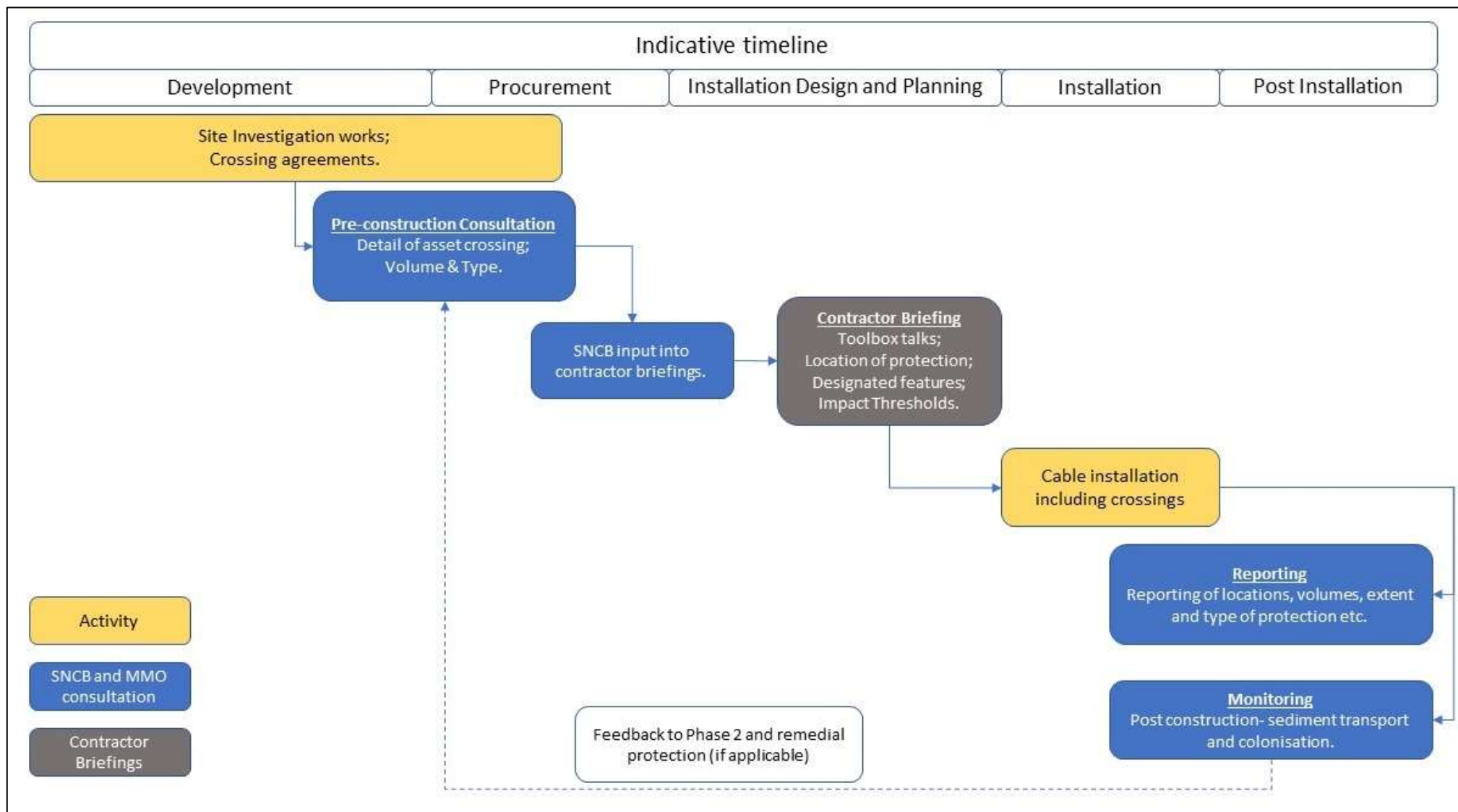


Figure 5.1: Outline consultation plan on cable crossings with indicative timelines.

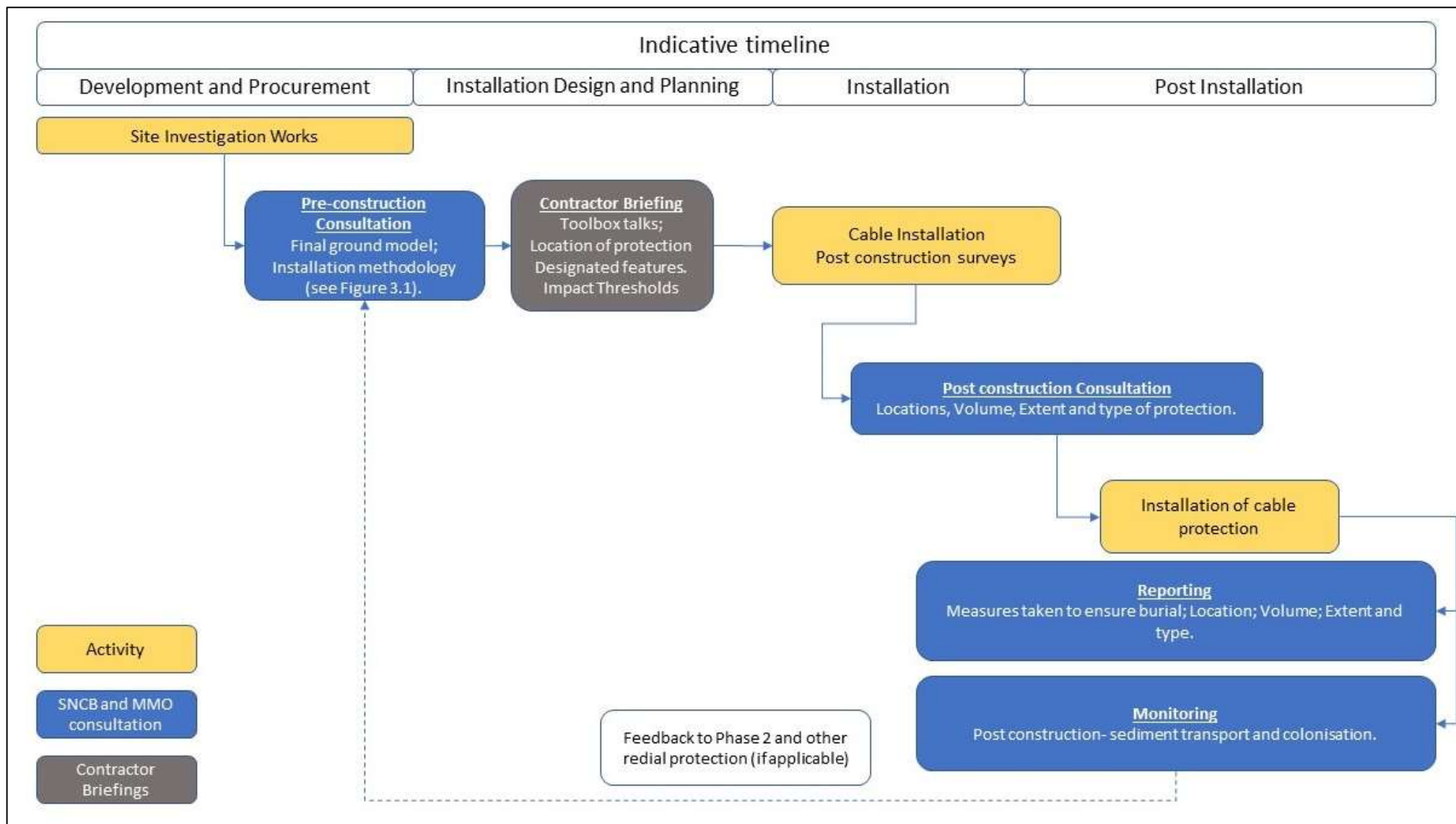


Figure 5.2: Outline consultation plan for cable burial and remedial cable protection with indicative timelines.

Reporting and compliance

- 5.10 Details of all cable protection installed to be reported to the MMO and SNCBs within 8 weeks following deployment of cable protection within designated sites, referring back to the limits stated in the maximum design scenario and DCO:
- Location of cable protection, including features affected;
 - Volume and extent (horizontal and vertical) of cable protection;
 - Type of protection – type and sizes;
 - Area of seabed affected by rock protection (with reference back to DCO commitments).

Monitoring and future management

- 5.11 Monitoring proposals (including full details of proposed methods and timescales) where cable protection material is applied (either for crossing or remedial) within designated sites will include:
- Effects on sediment transport; and
 - Colonisation of cable protection.
- 5.12 Post construction monitoring within each designated site to be reported to the relevant SNCB, with reports and data provided to the MMO and relevant SNCB in a format which best allows them to understand the effects on the designated features. This is in line with the Conservation Objectives of the North Norfolk Sandbanks and Saturn Reef SAC, i.e. Table 1 of the Supplementary Advice on Conservation Objectives (SACO): Annex I Sandbanks slightly covered by seawater all the time states: *JNCC advise a restore objective which is based on expert judgment; specifically, our understanding of the feature's sensitivity to pressures which can be exerted by ongoing activities i.e. oil and gas sector activities and cabling. Our confidence in this objective would be improved with longer term monitoring and access to better information on the activities taking place within the site.*
- 5.13 A recent JNCC study on the effect of rock protection (primarily from oil and gas decommissioning) on the Annex I sandbanks feature of the SAC also states: *Monitoring surveys post rock dump in sensitive areas have the potential to give valuable insights in to the integrity of the existing environment post decommissioning. Current close out reports from Oil and Gas decommissioning programmes occur within four months of the completion of offshore work including debris clearance and post-decommissioning surveys. Information included within close-out reports includes results of post-decommissioning environmental sampling including any immediate consequences of the decommissioning activity. A strategy for long term monitoring is required as part of the decommissioning plan. This strategy can be modified as a result of data obtained, for example, where evidence shows no detectable changes (DECC 2011b). Tailoring future environmental monitoring surveys, for instance using cameras to assess the seabed, may provide a more accurate insight to any changes in Annex I features (extent, height and biodiversity), in this case sandbanks which are slightly covered by seawater all the time.*

- 5.14 The proposals within this plan would therefore help the relevant SNCB to better understand both the extent and precise locations of rock protection within the designated sites associated with Hornsea Three and the effect of rock protection on designated features (including effects on sediment transport and ecological effects). This could be used by the relevant SNCB to provide evidence-based advice on future operations and to have greater confidence in future condition assessments of the designated site.