

From: Tania Davey [mailto:tdavey@wildlifetrusts.org]
Sent: 07 February 2019 16:12
To: Hornsea Project Three
Cc: Joan Edwards
Subject: TWT response to deadline 6

Dear Sir/Madam

Please find attached a post-hearing submission from The Wildlife Trusts.

Kind regards

Tania

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Mr Prentis
National Infrastructure Planning
Temple Quay House
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The Wildlife Trust reference: 20010531

BY EMAIL

7 February 2019

Dear Mr Prentis

Deadline 6: The Wildlife Trusts post-hearing submission and further comments for Hornsea Project Three

The Wildlife Trusts (TWT) attended the recent Hornsea Project Three hearing on offshore ecology issues and we have summarised our comments below. In addition, we provide further comments on the Outline Cable Specification Plan and Preliminary Trenching Assessment.

1. Written submission following the offshore issue specific meeting on 29th January 2019

1.1. Cabling within The Wash and North Norfolk Coast SAC

Our concerns regarding cabling within The Wash and North Norfolk Coast SAC have increased since becoming aware of Race Bank Offshore Wind Farm cable burial failure resulting in the need for rock protection. Our concerns have again increased since learning that The Wash and North Norfolk Coast SAC is now in unfavourable condition. To ensure no adverse effect on The Wash and North Norfolk Coast SAC from cabling works and cable protection, the following is required:

- An assessment of why Race Bank offshore wind farm cable burial has failed, resulting in the need for increase rock protection and a comparative assessment on if the same risks are likely for the Hornsea 3 cable route.
Post hearing comment: We welcome that some of this has been addressed in the Preliminary Trenching Assessment document.
- A new assessment using the recent condition information to understand if the recovery of The Wash and North Norfolk Coast SAC will take place with the addition of Hornsea Three cables. This assessment must take the cumulative effect of fishing into account. Fishing is one of the causes of unfavourable condition within The Wash and North Norfolk Coast SAC and therefore cannot be considered part of the baseline. We refer to Natural England's comments in their response to written questions for deadline 4 (REP4-130) "*fishing is mobile, variable and subject to change, fishing impacts may not be adequately captured in the baseline characterisation*".

1.2. Southern North Sea SCI Site Integrity Plan

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TWT supports the development of Site Integrity Plans to manage underwater noise disturbance impacts within the Southern North Sea SCI. However, we are concerned that no strategic mechanism is in place to manage and coordinate the multiple Site Integrity Plans that will be produced by offshore wind farm developers. With a lack of coordination in place to oversee the delivery of mitigation, there is a risk to the site integrity of the Southern North Sea SCI. TWT have been working on the suggestion of an offshore wind farm levy which could be part of a toolkit to deliver management. This has been shared with the Planning Inspectorate previously. We highlight that a strategic approach to mitigation and monitoring for offshore wind farms in Scotland is delivered through Regional Advisory Groups. We suggest this is replicated for English offshore wind farms undertaking noisy activities in the Southern North Sea.

2. Preliminary Trenching Assessment

We welcome the production of the Preliminary Trenching Assessment, which provides much more clarity on cable burial viability. The document highlights the complex geology found within the cable route area and how very detailed survey information will be required to ensure the most appropriate burial tools are used.

Although we welcome that the applicant has included a lessons learnt section in this document, we would welcome further information on the similarities and/or differences between the geology within the Race Bank cabling area and the Hornsea Three cable area within The Wash and North Norfolk Coast SAC. This will provide clarity on if the problems encountered for Race Bank cabling pose a similar risk within the Hornsea Three area cabling area.

3. Cable Specification and Installation Plan

TWT welcomes the further clarity on the post-consent process and monitoring in relation to cabling activity. We request that the applicant engages with TWT post-consent during the development of this plan. It is essential that effective mechanisms are in place within the DCO or as a dML to ensure that detailed pre-construction survey work is undertaken to provide certainty that the correct burial tools are used. We welcome the monitoring which the applicant has proposed within the document. However, careful monitoring will be needed to ensure the amount of cable protection is recorded so that the total allowable amount consented within protected sites will not be exceeded.

Thank you for taking our comments into consideration.

Yours sincerely



Joan Edwards
Director, Public Affairs and Living Seas
The Wildlife Trusts