
From: Brown, Emma [mailto:Emma.Brown@naturalengland.org.uk]

Sent: 08 February 2019 17:22

To: Hornsea Project Three

Subject: Hornsea Project Three Deadline 6 Submissions

Good Afternoon,

Please find Natural England's Written Submissions for Deadline 6 of the Hornsea Project Three Offshore Windfarm examination attached.

This includes our written summaries of the Offshore Ecology and DCO Issue Specific Hearings, along with several Annexes which are provided in response to requests made by the Examiner.

Please note Natural England are not providing a response to the Examiners' questions relating to Markham's Triangle MCZ within this submission.

Natural England has reviewed the relevant documents in consultation with JNCC and have prepared a response but we have subsequently received an email from the Applicant offering further clarification. Unfortunately it has not been possible for us to consider this new information in time for today's deadline, but we intend to give this further consideration and provide a response in due course.

Kind regards,

Emma

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Please note I currently work Monday - Thursday

<http://www.gov.uk/naturalengland>

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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

**NATURAL ENGLAND
WRITTEN SUBMISSION FOR DEADLINE 6**

**ISH 5 Appendix C: Natural England Comments on REP5 – 011: Appendix 3
Cable Specification Installation Plan (CSIP)**

Dated 7th February 2019

Natural England Comments on REP5 – 011: Appendix 3 Cable Specification Installation Plan (CSIP)

Summary

1. Whilst these comments are provided in the spirit of trying to find common ground; it should be noted that it may not be possible, even with the potential provision of further information, to satisfactorily address all of our nature conservation concerns and thus change our advice/position as set out in our Written Representations at Deadline 1. However, this is not to say that any further information and/or revisions wouldn't help inform any risk based decisions made by the competent authorities.
2. Overall we believe a CSIP is useful document and consider it to be best practice to provide such a plan for installation activities within designated sites.
3. However, the CSIP only ensures compliance with the consent. As Natural England has outstanding concerns with the Applicant's proposals and/or do not have sufficient information and evidence to advise on the impacts of those proposals; this document does not change our position in consenting terms.
4. In addition this document largely concerns the installation phase and based on the discussions within ISH 5, Natural England's current understanding is that the Applicant would like to place the 10% cable protection anytime over the lifetime of the project. We therefore believe that there are unlikely to be the same level of controls beyond the initial installation to minimise impacts to the designated features and would therefore question the overall value of this document without an amendment to a DCO/DML condition to ensure that the requirements of the CSIP are also adhered to during any subsequent operation phase when the condition requirements are likely to be transferred to an Offshore Transmission Organisation (OFTO). NB: Section 1.4 Schedule 11 wording only relates to construction.

Detailed Comments

5. Section 2: Any further iterations/versions of the CSIP post consent would need additional/amended text to be included in a dialogue box for ease of clarity and review.
6. Section 3.1: Whilst NE understands and welcomes the Applicant's view that cable protection is to be a last resort; there is no definite commitment to limit the amount of cable protection to a specified amount and/or locations during/ post construction. Therefore the assessment remains for the 10% plus additional 25%.
7. Section 3.2: Whilst it is noted later on in the document that engineers may attend some meetings we request that this is the norm rather than the exception as it avoids understandings and helps find appropriate solutions.
8. Section 3.3: We would welcome input into contractor tendering and pre

installation consultation.

9. Section 3.4: The provision of these docs is best practice in designated sites and is not considered as mitigation.
10. Section 4.1: We welcome the inclusion of the following text '*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.*' Which will demonstrate compliance. However, there is not enough information provided now to be sufficiently clear on the impacts so that whilst this is welcomed should consent be granted it does not address the examination issues of not having a full enough understanding of the impacts through the EIA/HRA process to advise on level of impacts in designated sites.
11. The CSIP should help to ensure that impacts are no bigger than predicted/ consented and as stated in 4.2 will help with evidence base going forwards. We agree with this comment. But it effectively means we are all stuck post consent with the consented parameters and very difficult to change them e.g. Race Bank
12. Section 4.3: We would welcome the clarification now on what is the maximum design scenarios. Our understanding is that the text as it stands wouldn't take into account any modifications the Applicant has or may do to minimise the impacts during the examination process
13. Section 4.4: This section should also consider deposition of disposal material in areas of similar grain size to further enable the recovery of benthic communities over time. Again as per 4.3 as much information on the level of risk (low, med, high) etc. should be provided upfront prior to consent.
14. Section 5: Natural England queries what happens if once more site specific data is available we advise that there is an AEol? How can the MMO be certain that AEol will/can be avoided?
15. Section 5.10: We would like to see this mapped as well as presented. This license condition used at IFA2 interconnector is consider appropriate:

Within 3 months of completion of licensed activities, an 'as built' plan displaying the location of the cable as laid with specific details of the locations of buried and surface-laid cables, the placed location and quantity of rock placement or rock matting used in these works must be submitted to the MMO.
16. Section 5.10: Natural England queries how impacts to surrounding areas as noted for sandwave levelling at Race Bank will be taken into account?
17. Section 5.11 as 5.9: The monitoring should also focus on impacts on benthic habitat of habitat loss/ change and whether cable protection remains exposed or becomes covered in sediment, not just sediment transport and colonisation. It is about form and function and fully understanding impacts and recoverability. Scope for surveys should be agreed in consultation with the SNCBs to address residual concerns.

18. Section 5.14: Whilst we agree with the text it should be caveated by previous comments.