
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

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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**

**ISH5 Annex A: Natural England's Comments on REP 4 097 Biotope
Clarification paper as requested at ISH 5.**

Dated 7th February 2019

Natural England's Comments on REP 4 097 Biotope Clarification paper as requested at ISH 5.

Natural England have reviewed this clarification paper in consultation with JNCC, and we do not consider that it sufficiently addresses our concerns.

The issue remains that SNCBs (NE & JNCC) do not consider that the processes the applicant took to reach their biotope results to be scientifically rigorous. Whilst we accept that the conclusions appear consistent with the JNCC/Cefas biotopes, this does not necessarily indicate that they are correct.

For example, JNCC could have found ApriBatPo, and the Applicant could have found the same in a similar area. To get these results, there could be several things happening:

- 1) Both sets of survey methodologies and accuracies allowed analyses to show the same conclusion
- 2) One set of survey methodologies and accuracies was as above, and the other set could show the same result, albeit artefactually from incorrect analyses or poor evidence

Within our submissions to date, we've maintained that we can't tell which situation is occurring. The Applicant's habitat mapping could be correct, but because the processes through which they analysed their data is somewhat different to the standard set of analyses undertaken with survey evidence we are unable to establish this.

Consequently, as per our response to The Examiner's Question in ISH 5, we are unable to confirm that the assessment of the baseline for North Norfolk Sandbanks and Saturn Reef SAC is appropriate.