



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES
2010

Rampion Two Offshore Wind Farm

Appendix C5 to the Natural England Deadline 5 Submission

Natural England's Advice on Marine Mammals

For:

The construction and operation of the Rampion 2 Offshore Windfarm located approximately 13km off the Sussex coast in the English Channel.

Planning Inspectorate Reference EN010117

Natural England's Advice on Marine Mammals

In formulating these comments, the following documents have been considered:

- [REP4-020 & REP4-021] - 6.2.11 Environmental Statement Volume 2 - Chapter 11 Marine Mammals Rev C (tracked)
- [REP4-055 & REP4-056] - 7.18 Offshore In Principle Monitoring Plan Rev B (clean & tracked)
- [REP4-051 & REP4-052] - 7.14 Draft Piling Marine Mammal Mitigation Protocol Rev B
- [REP4-057 & REP4-058] - 7.22 Commitments Register Rev D (clean & tracked)
- [REP4-067] - 8.40 8.40 ITAP - Information to support efficacy of noise mitigation abatement techniques with respect to site conditions at Rampion 2 Offshore Windfarm

1. Summary of Key Points

As stated, in our covering letter Natural England will not be submitting an overall risk and issues log at deadline 5. However, we have included an extract of the following points within tab C – Marine Mammals, where the documents submitted at deadline 4 have generated updated advice/comments from Natural England.

Point	Point Number (s) from Appendix C [RR-265]	Taken from Natural England's Relevant and Written Representations Rampion 2 - Appendix C - Marine Mammals [RR-265]	Consultation, actions, progression at Deadline 5
C24	25 and 26, Summary 1 and 2, Volume 4, Appendix 11.3 Underwater noise assessment technical report	<p>The number of piles and pile locations per day needs to be clarified. In the text the Applicant has stated that up to 2 monopiles and 4 pin piles may be installed in a 24-hour period (Section 3.2.2). However, the Applicant appears to have modelled simultaneous and sequential piling occurring within a 24-hour period (Tables 4-31 and 4-33). If both sequential and simultaneous piling is within the envelope, then theoretically up to 4 monopiles or 8 jacket pin piles could be installed in a 24-hour period (and indeed this is what is stated as the worst-case scenario in Appendix 11.2). The worst-case piling scenario in a 24-hour period must therefore be clarified, modelled and used consistently. It should also be clarified whether a maximum of 2 locations may be installed in a 24-hour period.</p> <p>In addition, the worst-case spatial extent of the noise impact (particularly for disturbance) requires review. We query whether the east and west locations are the worst-case in terms of spatial extent of underwater noise impact, given that the worst-case propagation occurs at the South and East locations (Section 4). Should this instead be South and East (or another location)? This may make a difference to the noise impacts that occur over larger spatial scales (e.g. disturbance assessment using noise contours). The Applicant should ensure that the worst-case spatial extent for noise impacts from simultaneous piling has been modelled and update the assessments if necessary.</p>	<p>The Applicant has updated the marine mammal ES chapter to reflect that 4 monopiles or 8 pin piles may be installed in a 24-hour period. We note that no corresponding change in the modelling has been undertaken.</p> <p>We advise that the Applicant clarify that the worst-case scenario has been modelled appropriately, with respect to this update in the ES chapter and our relevant representation comment regarding worst-case spatial extent.</p>

C33	7.14 Draft Piling Marine Mammal Mitigation Protocol, 27, 32, 33, and 35, Summary 14	<p>We have several concerns regarding the MMMP: The acoustic deterrent device (ADD) duration is typically based on the permanent threshold shift (PTS) range. If the impact range is not presented for simultaneous piling, we query how an appropriate ADD duration can be calculated. The Applicant should consider this. The ADD is an important part of the mitigation measures and an appropriate duration is needed to demonstrate that its usage can reduce impacts to acceptable levels. The Applicant should present an approach to determining appropriate ADD duration for simultaneous piling.</p> <p>The MMMP should explicitly outline the soft start/ramp up procedure that has been modelled as the worst-case, and commit to not exceeding this soft start/ramp up profile. This will ensure that the worst-case impact ranges are not exceeded. Furthermore, the Joint Nature Conservation Committee (JNCC) guidelines for piling mitigation state that the soft start should be a minimum of 20 minutes. It is therefore not appropriate to have a soft start that is 7.5 minutes. The terminology used should match that in the guidelines and clearly demonstrate that the guidelines are being adhered to.</p> <p>We welcome the inclusion of at-source noise abatement methods in the draft MMMP, however, there is limited evidence on the level of noise reduction of various systems and their efficacy in the environmental characteristics of the site that may affect their deployment. We advise that the Applicant needs to give due consideration to the uncertainties that exist regarding the level of abatement that may be achieved in the environmental conditions at the Rampion 2 site.</p>	<p>We note that the updated MMMP now states the ramp up profile, which partially addresses our concern. However, it still incorrectly refers to the soft start duration being 7.5 minutes.</p> <p>We note that the information provided in the "<i>Information to support efficacy of noise mitigation / abatement techniques with respect to site conditions at Rampion 2 Offshore Windfarm</i>" provides useful information on the considerations around NAS for this site. See Appendix E5 for further advice regarding this matter.</p> <p>Our point regarding ADD duration remains unaddressed.</p>
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C40	Summary 14, Comment 42, 7.18 Offshore in Principle Monitoring Plan)	Currently the only post-consent monitoring that has been proposed is the industry-standard monitoring of underwater noise from the first 4 piles. Whilst the Applicant refers to the Marine Mammal Mitigation Plan (MMMP) there is no consideration of monitoring the effectiveness of the mitigation measures in reducing the impacts to acceptable levels.	We advise that the Applicant's proposed change to monitor 4 piles from the first 12 foundations is not sufficient to address this point. We advise that further information is required with regards to consideration of monitoring the effectiveness of the mitigation measures in relation to impacts on marine mammals.
C41	Mitigation, Summary 13	The embedded environmental measures outlined by the Applicant (in Table 11-14 in the ES Chapter 11 Marine Mammals) should be secured in the DCO/dML. Specifically: C-51 (Vessel Management Plan) – this should be secured for all phases of the project, C-52 (piling Marine Mammal Mitigation Plan), C-102 (UXO Clearance Marine Mammal Mitigation Protocol). We note that the Table 11-14 details that C-51 and C-52 will be secured in the DCO or dML conditions. C-102 will be secured through the application for UXO clearance works marine licence. Natural England query whether this secures that the final MMMP will be in accordance with the Draft MMMP submitted with this Application. There are also two other commitments Natural England strongly support in Table 11-14 and welcome the proposal to secure these in the dML: C-265 (piling noise mitigation technology), C-275 (low order detonations).	We understand that the commitments in the marine mammal ES chapter are now secured in the standalone commitments document. We note that the text in commitment C-265 of the marine mammals ES chapter has not been updated to reflect the change in the commitments register. We advise that this is updated.