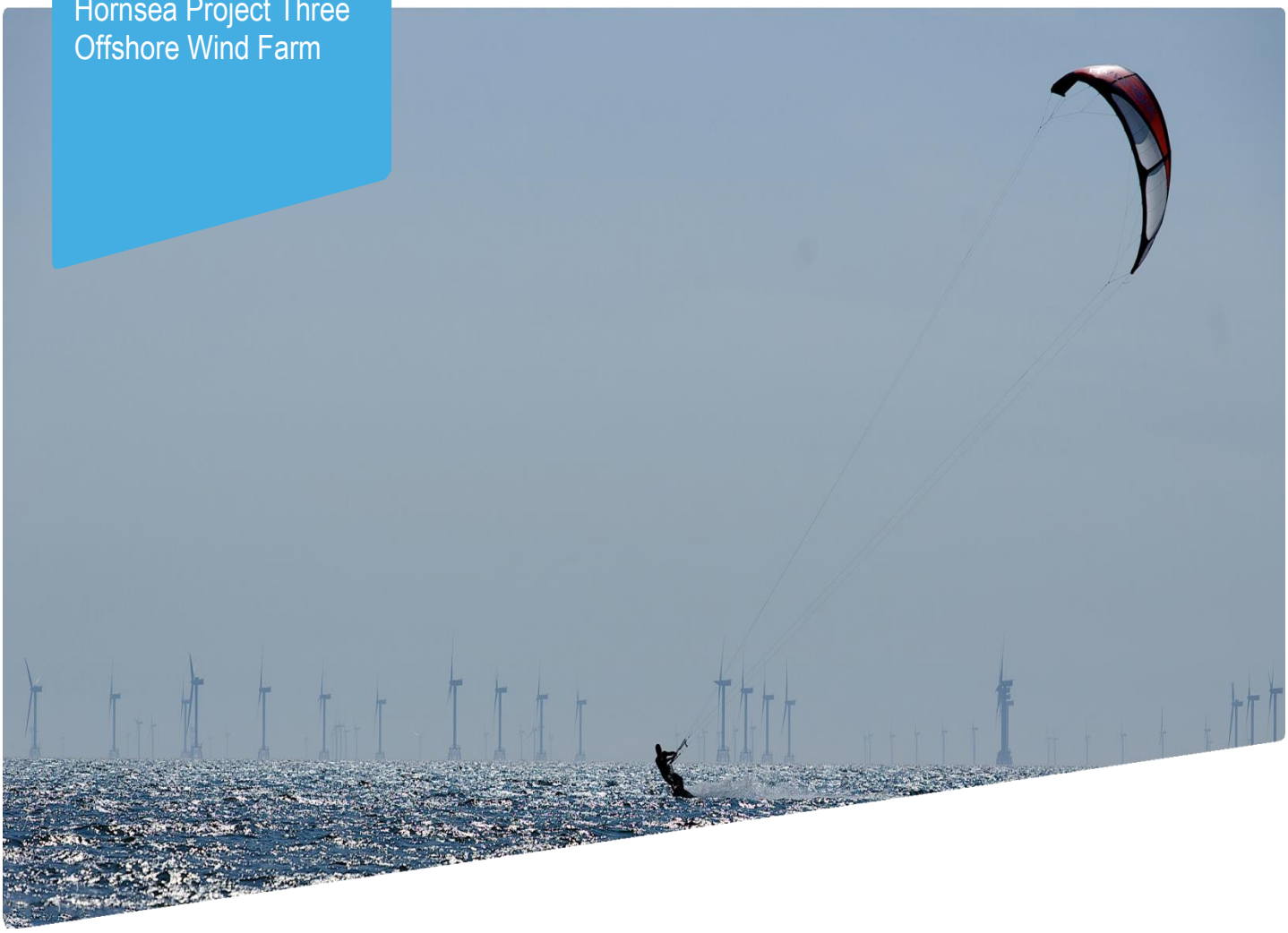
Hornsea Project Three
Offshore Wind Farm



Hornsea Project Three

Offshore Wind Farm

Response to the Secretary of State's Consultation
Appendix 2A: Sandbanks Compensation Strategy

Date: February 2020

Hornsea 3
Offshore Wind Farm

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Response to the Secretary of State's Consultation

Appendix 2A: Sandbanks Compensation Strategy

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Front cover picture: Kite surfer near a UK offshore wind farm © Orsted Hornsea Project Three (UK) Ltd., 2020.

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Acronyms

Acronyms	Description
AEOI	Adverse Effect on Integrity
BEIS	Department for Business, Energy and Industrial Strategy
DCO	Development Consent Order
EIFCA	Eastern Inshore Fisheries and Conservation Agency
FID	Financial Investment Decision
ha	Hectare
INNS	Invasive non-native species
MMO	Marine Management Organisation
Nm	Nautical mile
NNSSR	North Norfolk Sandbanks and Saturn Reef SAC
RIAA	Report to Inform Appropriate Assessment
ROV	Remotely Operated Vehicle
SAC	Special Area of Conservation
SNCB	Statutory Nature Conservation Body
WNNC	The Wash and North Norfolk Coast SAC

1. Purpose

Introduction

1.1 This document sets out the Sandbanks Compensation Strategy for The Wash and North Norfolk Coast (WNNC) and North Norfolk and Sandbanks and Saturn Reef (NNSSR) Special Areas of Conservation (SAC). It has been developed in support of the Hornsea Three Application in response to the Request for Information issued by the Secretary of State for the Department for Business, Energy and Industrial Strategy (BEIS) on 27 September 2019 on matters relating to the delivery of compensatory measures for the Hornsea Three Application. Specifically, this strategy sets out how the preferred measures for compensation relating to effects on sandbanks (as identified within the Compensatory Measures Response) would be secured and delivered under a scenario whereby the Secretary of State determines that compensation for an adverse effect on the sandbank habitats of The WNNC and NNSSR SACs is required.

1.2 In this scenario, a draft DCO requirement has been proposed that the Secretary of State could include in the final DCO for the delivery of the sandbanks compensation package (see Section 2).

1.3 This DCO requirement would be supported by this Sandbanks Compensation Strategy, the proposed wording of which is provided in Section 2.

1.4 Further details on the precise delivery methodology for the measures would be provided in a pre-commencement commitment to produce a Sandbanks Compensation Plan, to be agreed with the Statutory Nature Conservation Body (SNCB).

Compensation package

The proposed compensation package for effects on sandbanks, in the event that the Secretary of State is unable to reach a conclusion of no adverse effect on the integrity of The WNNC and NNSSR SACs, is summarised in

1.5 Table 1.1.

1.6 The objectives of this compensation package are detailed in paragraphs 3.5 to 3.7 (blue mussel) and 3.22 to 3.24 (marine litter).

Table 1.1: Compensation Measures developed by Hornsea Three for Sandbank Habitat

Compensation Measure	Description
Habitat improvement and species recovery:	
a) Blue mussel bed restoration; and b) Biosecurity measures for blue mussel beds.	The restoration of up to 44.57 ha of blue mussel bed within The WNNC SAC; a priority habitat which is a sub-feature of the shallow inlets and bays Annex 1 feature. This would be accompanied by biosecurity measures to help ensure the long-term success and resilience of the new blue mussel bed.
Habitat Restoration:	
c) Marine litter removal within or near The WNNC SAC.	Marine litter removal (within or near The WNNC SAC) and measures to increase the recovery of future lost gear (within the Eastern Inshore Fisheries and Conservation Agency (EIFCA's) district), focused on lost/abandoned fishing gear within sandbank habitats

Hornsea Three has identified examples (in

1.7 Table 1.2 to Table 1.4) as to how these measures could be packaged to deliver the required level of compensation depending on the outcome of the decision by the Secretary of State.

1.8 Factors which may influence the content of the compensation package include the spatial extent of any impact on the designated sandbank habitat that is deemed to represent an adverse effect on site integrity by the Secretary of State, the final scheme design (noting that the current proposals are based on a Rochdale Envelope approach and associated worst case assumptions and not final scheme design that will be taken forward into construction), the extent of suitable locations found for mussel establishment and the results of desk-based and geophysical surveys. In all cases for sandbank compensation, the Applicant would first seek to restore blue mussel beds up to the spatial extent of the adverse effect concluded by the Secretary of State (pre determination of the application defined by the Applicant's worst case, then defined by any conclusions the Secretary of State forms, and then further refined as the final scheme design that will be taken forward into construction). For all options, a commitment would also be made to actively engage with local relevant stakeholders to identify and remove lost/abandoned fishing gear (proportionate to the worst case impact at the respective time) from nearshore areas within the EIFCA's district (up to 6nm within The WNNC SAC).

If the Secretary of State is minded to apply compensation measures to both The WNNC and NNSSR SACs, then

1.9 Table 1.2 applies.

Table 1.2: Package of Measures: 44.57 ha long-term adverse effects on The WNNC and NNSSR SACs

Number	Measures
1	44.57ha of mussel restoration plus associated biosecurity measures.
2	Active engagement with local stakeholders to identify and remove lost/abandoned fishing gear in nearshore areas.
3	Awareness campaign and improved recovery measures for marine litter (fishing gear).

1.10 If the Secretary of State is minded to apply compensation measures to either The WNNC or NNSSR SACs, then Table 1.3 or Table 1.4 apply.

Table 1.3: Package of Measures: 41.8 ha long-term adverse effect on the NNSSR SAC

Number	Measures
1	44.57ha of mussel restoration plus associated biosecurity measures.
2	Active engagement with local stakeholders to identify and remove lost/abandoned fishing gear in nearshore areas.
3	Awareness campaign and improved recovery measures for marine litter (fishing gear).

Table 1.4: Package of Measures: 2.77 ha long-term adverse effect on the WNNC SAC

Number	Measures
1	2.77 ha of mussel restoration plus associated biosecurity measures.
2	Active engagement with local stakeholders to identify and remove lost/abandoned fishing gear in nearshore areas.
3	Awareness campaign and improved recovery measures for marine litter (fishing gear).

The Applicant is confident that the package of measures described is sufficient to compensate for the extent of Hornsea Three's maximum design scenario within these designated sites. The Applicant has considered contingency measures which could be adopted should initial establishment and management (of the packages identified in

1.11 Table 1.2 to Table 1.4) not succeed to the target extent. The detail and timing of when these further measures would apply would be secured in the Sandbanks Compensation Plan (see below). They relate to eelgrass (*Zostera*) restoration in The WNNC SAC and/or debris removal in The WNNC and/or litter/debris removal in the NNSSR SAC.

Environment Engagement Group

1.12 If the Secretary of State determines that compensation is required, following the Order being made, a Hornsea Three Offshore Environment Engagement Group would be established comprising the relevant SNCB(s) and potential delivery partner(s)[1]. The purpose of this group would be to help shape and inform the nature and delivery of the compensation package post consent. The Environment Engagement Group would be consulted on the proposed Sandbanks Compensation Plan[2] prior to submission to the Secretary of State and during the approval process as necessary.

1.13 The Applicant would engage with and report to the Environment Engagement Group at least annually in the establishment phase and as needed, and as documented in the Sandbanks Compensation Plan throughout the monitoring period. Terms of Reference would be agreed between the parties. The Applicant would be the chair and convener of the Environment Engagement Group.

2. Draft DCO Requirement

2.1 If required, this Sandbanks Compensation Strategy would form a certified document and commit the Applicant to delivering a Sandbanks Compensation Plan prior to the commencement of offshore cable installation works[3] and in accordance with its principles as set out within the draft DCO (see Appendix 9/10 to the Applicant's Response). This commitment is included at Article 44, Schedule 14 of the draft DCO, and is worded as follows:

Sandbanks Compensation Plan

1.—*(1)No later than 12 months prior to the commencement of offshore cable installation works in Work No. 2(c) and (d), Work No. 3(c) and (d) and Work No. 5, a Sandbanks Compensation Plan for each of the SACs must be submitted to the Secretary of State for approval.*

(2) No offshore cable installation works in Work No. 2(c) and (d), Work No. 3(c) and (d) and Work No. 5 shall be commenced until the Sandbanks Compensation Plan has been approved in writing by the Secretary of State.

(3) The Sandbanks Compensation Plan(s) must accord with the principles set out in the Sandbanks Compensation Strategy relating to the protected feature "sandbanks slightly covered by water all the time".

[1] For blue mussel restoration and nearshore marine litter compensation the delivery partner is likely to be the EIFCA. For eelgrass compensation, the delivery partner is likely to be Environment Agency (both subject to further discussions).
[2] Containing detail on the delivery of both Blue Mussel Bed Restoration and Marine Litter Removal.
[3] "commencement of offshore cable installation works" means the first day on which export cable sea bed preparation is programmed to be undertaken.

(4) Before approving the Sandbanks Compensation Plan(s) the Secretary of State must consult the MMO and Natural England and, in relation to the North Norfolk Sandbanks and Saturn Reef SAC only, JNCC.

(5) The Sandbanks Compensation Plan(s) must contain an implementation timetable and must be carried out as approved.

Consultation

***5.** Prior to the submission of the Kittiwake Compensation Plan, the Sandbanks Compensation Plan and the MEEB Plan to the Secretary of State for approval, the undertaker must carry out pre-application consultation in accordance with that set out in the Kittiwake Compensation Strategy, Sandbanks Compensation Strategy, and the In principle MEEB Plan respectively.*

Amendments to approved details

***6.** The Kittiwake Compensation Plan, the Sandbanks Compensation Plan and the MEEB Plan approved under this Schedule, include any amendments that may subsequently be approved in writing by the Secretary of State.*

***7.** Any amendments to or variations from the approved Kittiwake Compensation Plan, the Sandbanks Compensation Plan and the MEEB Plan must be in accordance with the principles and assessments set out in the Kittiwake Compensation Strategy, Sandbanks Compensation Strategy, and the In principle MEEB Plan, (as applicable) and may only be approved in relation to immaterial changes where it has been demonstrated to the satisfaction of the Secretary of State that it is unlikely to give rise to any materially new or materially different environmental effects from those assessed in those strategies.*

3. Sandbanks Compensation Strategy

Introduction

3.1 This Compensation Strategy would only take effect if the Secretary of State determines that Hornsea Three would have an adverse effect on the integrity of The WNNC SAC and/or the NNSSR SAC and imposes a DCO requirement for the provision of compensation. The level of compensation required would be established by the worst case footprint as defined in the Appropriate Assessment (by the Secretary of State) and any relevant refinements to that footprint based on the final project design taken forward into construction.

3.2 The package of measures described in paragraph 3.3 *et seq*. (relating to blue mussel beds) and paragraph 3.20 *et seq*. (relating to marine litter) is deliverable and sufficient to compensate for any adverse effect from Hornsea Three within these designated sites. However, contingency measures have been developed which could be adopted should initial establishment and management of the blue mussel bed and marine litter measures not succeed to the target extent. These measures are described in paragraph 3.34 *et seq*. (eelgrass restoration) and paragraph 3.38 *et seq*. (litter/debris removal).

Habitat Improvement: blue mussel bed restoration and biosecurity measures

Introduction

3.3 The conservation objectives of The WNNC SAC include ensuring that, subject to natural change, the integrity of the site is maintained or restored as appropriate, and that the site contributes to achieving the Favourable Conservation Status of its 'qualifying features', by maintaining or restoring their structure and function (including typical species). The restoration of mussel beds would help in the recovery of the species composition of component communities of the Annex I sandbanks feature (Hab_Att_3.01). Their establishment would compensate for the loss of habitat in The WNNC SAC directly and in the NNSSR SAC indirectly.

3.4 Consultation with Natural England and the EIFCA has identified support for this measure and established that:

- existing mussel beds within The Wash range from 1 ha to 60 ha in size; and
- the conservation objectives for The WNNC SAC include a target of restoring the extent of mussel beds to 500 ha. However, the current extent of mussel beds is only 464 ha and there are no current proposals to establish new wild mussel beds. Historically mussel beds have been more extensive than the current target.

Objective and scale

3.5 To qualify as a "bed", blue mussels should provide at least 20% cover of sediments over an area of at least 5 m x 5 m. This definition is informed by the OSPAR case study report for intertidal blue mussel beds on mixed and sandy sediment (OSPAR, 2010[4]), which indicates that the ecosystem engineering effect caused by the mussels is most apparent under high densities, when substrate binding and habitat provision for other plants and animals occur.

3.6 The objective of the blue mussel bed compensatory measure is to improve the habitat within The WNNC SAC through the creation of up to 44.57 ha of new blue mussel bed(s).

3.7 This would equate to the combined worst case long-term impact from the Hornsea Three development (due to placement of cable protection) within The WNNC and NNSSR SACs (44.57 ha).

Delivery process

Blue mussel bed restoration

- In the first instance, Hornsea Three would work with its proposed delivery partner, the EIFCA, to:
- identify suitable location(s) with environmental conditions that are more likely to be conducive to supporting strong and healthy beds;
- identify a suitable method for preparing and seeding the mussel bed(s);
- develop or acquire appropriate volumes of seed mussel and/or prepare a bed(s) of suitable size to support a mussel bed of 44.57 ha; and

[4] OSPAR. 2010. Intertidal Mytilus edulis beds on mixed and sandy sediments. Case Reports for the OSPAR List of threatened and/or declining species and habitats - Update.

- prepare any necessary licenses and supporting documents to facilitate the establishment of mussel bed(s).

3.8 All methods for seed development would be explored, with some of the more well documented methods including suspended collectors, hatchery production or harvesting from wild beds (such as those in Morecambe Bay, Caernarfon Bay, South Wales and The Wash[5]). Alternative measures, such as bed preparation (through the use of cockle / slipper limpet shell) laid adjacent to existing mussel beds to support natural seeding, would also be explored. A full feasibility assessment will be carried out for the chosen method.

3.9 Once the upfront works are complete, a suitable marine contractor would be appointed to deploy the mussel seed onto the desired location (equating to the delivery of this measure). Once the mussel bed(s) had been laid, monitoring and any necessary adaptive management would occur.

Biosecurity measures

3.10 There are a number of threats to blue mussel beds, including parasitic infestation, disease, toxins, planktonic species variation and environmental factors (including water temperature and immersion times), which have the potential to influence long term establishment in The Wash. Evidence on these factors is in development, and the Applicant would continue to engage with the EIFCA to align this measure with best available evidence at the time of works.

3.11 The EIFCA have identified that, whilst it is not possible to avoid parasitic infestation, it may be possible to manage the risk it poses to a mussel bed through careful site selection; a bed with greater food source opportunity and protection from wave climate is likely to be more resilient to parasitic infestation. Careful site selection would be undertaken as part of the delivery of this measure.

3.12 The final biosecurity measure that would be taken is for Hornsea Three to assist in the removal and management of invasive, non-native species (INNS), where relevant. It is understood through discussion with the EIFCA that slipper limpet is an INNS that is widespread in low densities within The WNNC SAC. Accordingly, Hornsea Three would look for an opportunity, within its delivery of the blue mussel bed measure, to assist in the removal and or management of this INNS. This may be through siting the mussel bed on existing slipper limpet beds where conditions for mussel bed establishment are optimal (a potential method of control suggested by the EIFCA) or the identification of slipper limpet beds through the mussel monitoring work, to aid in its management by the EIFCA.

Delivery timeframe

3.13 It is anticipated that the preparatory works associated with identifying a site(s) and developing / sourcing an appropriate amount of seed mussel, securing necessary licences for the work, appointing competent third parties to undertake the field based components of the work, etc. would take one to two years, after which the mussel bed(s) could be laid. Preparatory works would include a full feasibility study undertaken by a suitably qualified person, and the chosen method would be in line with best available scientific evidence. Once the mussel seed is laid, establishment works would be complete, and the bed would be subject to ongoing monitoring and biosecurity commitments.

[5] Suarel. C., Gascoigne. J., Kaiser. M.J. 2004. The Ecology of Seed Mussel Beds. Literature Review.

3.14 The desk based preparatory works would take place post consent, with the development / sourcing of seed and subsequent deployment to site taking place post Financial Investment Decision (FID) / pre commencement of offshore cable installation works in either SAC. The measure, therefore, would be delivered before the impact occurs to either SAC.

3.15 Ongoing monitoring (and where necessary implementation of biosecurity measures and or adaptive management) would take place following the completion of the bed laying.

Monitoring and reporting

3.16 A monitoring package would be designed with the delivery partner and the Environment Engagement Group. Monitoring would focus on the establishment of the mussel bed(s) and the expected changes to the associated benthic communities in the vicinity over time. In the early years (two to three years), as the bed establishes, a suitable monitoring campaign would be developed in consultation with the EIFCA, after which monitoring would be undertaken on an annual basis (for a duration of five years or as agreed with the Environment Engagement Group and detailed within the Sandbanks Compensation Plan).

3.17 If necessary, adaptive management would be undertaken. This could include re-seeding the bed, attempting mussel restoration in an alternative location or implementing measures to help reduce other pressures if necessary. If blue mussel bed restoration is unsuccessful, further measures (such as eelgrass restoration or litter/debris removal) would be investigated in consultation with the SNCB.

Sandbanks Compensation Plan

3.18 Prior to commencing works on blue mussel bed restoration, Hornsea Three Project would prepare in consultation with EIFCA and Natural England a Sandbanks Compensation Plan. The Sandbanks Compensation Plan would be prepared in accordance with the principles of this Compensation Strategy. The Sandbanks Compensation Plan would draw on best practice guidance and the advice of specialists as appropriate.

3.19 The Sandbanks Compensation Plan would set out, where relevant:

- Objectives (in accordance with the above objective).
- Works details (including specific locations, timing etc.).
- A schedule of works and working methods.
- Monitoring, reporting and adaptive management.

Habitat Restoration: litter removal (nearshore)

Introduction

3.20 This compensatory measure would comprise working with the delivery partner (currently proposed to be the EIFCA) to identify and subsequently remove marine litter (principally lost or abandoned fishing gear) located within sandbank habitat, and the delivery of a programme to increase awareness and measures to improve the recovery of lost gear.

3.21 This measure would serve to support the restoration of the sandbank habitat off the North Norfolk coast and specifically within The WNNC SAC.

Objective and scale

3.22 The removals component of this measure would have the objective to restore sandbank habitat to the extent of the litter footprint. This would be achieved through the direct removal of such material from the seabed.

3.23 The geographic focus of the nearshore marine litter compensation measure would be off the North Norfolk coast and in The WNNC SAC in particular. It is proposed that dense areas of lost gear identified on adjacent sandbank habitats would be considered for removal as part of this measure.

3.24 As a minimum, this measure would target marine litter within the designated site, however (if required to satisfy the scale of compensation required) the scale of this measure can be expanded out to include marine litter removal work over a wider area.

Delivery process

3.25 Hornsea Three would work with the delivery partner (currently proposed to be the EIFCA) and local fishing industry as well as local conservation groups to establish areas where there is known or likely potential for lost or abandoned fishing gear. This process would be followed by site investigation works (which may comprise high resolution geophysical survey techniques and/or remotely operated vehicles (ROVs)) to identify the precise location of marine litter. Following identification of any marine litter, any necessary licenses would be secured, and the material subsequently removed in a single campaign and returned to shore for re-purposing where possible or appropriate waste disposal.

3.26 The removal works would be accompanied by awareness events with the fisheries industry in the EIFCA's district that operate within the WNNNC SAC. These could be undertaken in partnership with relevant NGOs, the MMO, EIFCA and NFFO, and would focus on the ecological, safety and economic risks associated with lost gear.

3.27 It is also proposed that the identification of suitable measures to facilitate the rapid recovery of lost gear would be developed with the EIFCA. These may comprise options such as voluntary reporting and provision of technical solutions (such as transponders[6]) that can be fixed to static gear, the detail of which will be confirmed in the Sandbanks Compensation Plan.

Delivery timeframe

3.28 The Sandbanks Compensation Plan (see paragraph 3.33) would be approved prior to the commencement of offshore cable installation works (and therefore prior to any adverse effects arising). The implementation of the physical compensation measures would then be in accordance with the programme documented in the Sandbanks Compensation Plan. Litter removal works would provide an immediate improvement in terms of physical attributes and biological recovery.

[6] Such as https://www.ncl.ac.uk/press/articles/archive/2019/04/nettag/

3.29 The programme of delivery for the implementation of measures to improve the recovery process of lost gear would also be agreed within the Sandbanks Compensation Plan prior to the commencement of offshore cable installation works, and ideally delivered prior to installation works. The first year would focus on the identification of appropriate solutions and engagement with the fishing industry (through the EIFCA), potentially including education/awareness events. It is understood that EIFCA currently undertake ongoing consultation with the local fishing industry relating to static gear fishing in this region, and discussions should be timed to maximise the success of the engagement (noting that, during summer months, the fishermen are focused on carrying out fishing and, therefore, less likely to find time to engage on such matters). The measure to increase the recovery of lost gear (including education/awareness/technology delivery) could be delivered concurrent to offshore export cable installation works.

Monitoring and reporting

3.30 The monitoring of litter removal work would be limited to the duration of the works themselves. That is, the removal process would be monitored, and the results recorded, but there would not be an ongoing monitoring process.

3.31 The removals would be reported to the Environment Engagement Group in accordance with a methodology to be developed within the Sandbanks Compensation Plan.

3.32 It is proposed that an annual report, for the duration of the offshore construction works, that covers measures associated with the uptake of technology aimed at the rapid identification / reporting of lost gear would be prepared by the EIFCA (supported by Hornsea Three) and reported to the Environment Engagement Group, with the need for any future ongoing reporting to be defined within the Sandbanks Compensation Plan.

Sandbanks Compensation Plan

3.33 Prior to commencing offshore export cable installation works, Hornsea Three would prepare and submit for approval a Sandbanks Compensation Plan in accordance with the requirements of the Order. Further details are provided in paragraph 3.18 above.

Species Reintroduction: Eelgrass (*Zostera*) Restoration

3.34 If required (due to any unforeseen failure in the delivery of the blue mussel bed measure and following any necessary adaptive management efforts), Hornsea Three would undertake re-establishment of eelgrass within The WNNC SAC. The scale would be agreed with the SNCB and delivery partner (anticipated to be the Environment Agency) and detailed within the Sandbanks Compensation Plan.

3.35 The first phase of this measure would comprise a desk-based exercise to work with the delivery partner and relevant SNCB(s) to identify a suitable location and methodology. Once a suitable location and methodology had been determined, Hornsea Three would facilitate the implementation of the measure.

3.36 Monitoring of the eelgrass bed would seek to demonstrate that the site selection process for the identification of suitable restoration locations and establishment methodologies were viable within the WNNC SAC.

3.37 Given the proposed nature of this measure (as an adaptive response to be implemented as necessary) its timing has not been defined, however, it would likely occur after the construction works associated with the offshore export cable have taken place (i.e. post impact).

Habitat Restoration: litter/debris removal (nearshore or offshore)

3.38 The removal of marine litter/debris (if required due to any unforeseen failure in the delivery of the blue mussel bed measure and following any necessary adaptive management efforts) would entail working with relevant offshore industry groups, the MMO, SNCBs and TCE to identify any material within the designated (or adjacent) sandbank habitats that can be readily removed without constraint (i.e. technical feasibility, ongoing ownership liability issues or unacceptable HSE risks (for example, oil and gas platforms, installed subsea infrastructure and pipelines are excluded)). Should this measure need to be progressed, this is likely to comprise a desk-based screening exercise of debris, and consultation with relevant sectors and regulators.

3.39 As nearshore litter within The WNNC SAC is addressed as part of the primary package, nearshore areas would be searched for debris only as part of this measure. Offshore, within the NNSSR SAC, this measure would cover marine litter and/or debris as reasonable and proportionate.

3.40 Following this, a targeted ground-truthing exercise over an area up to 20 ha would be actively surveyed for marine litter/debris. The survey would seek to identify (using high resolution and ROV techniques) the nature and precise location of the litter/debris and licences would be sought from the MMO, if necessary, for the removal and disposal activity. The litter/debris found within this area would be removed by a suitable contractor following the process in paragraph 3.20 *et seq*.

3.41 Given the proposed nature of this measure (as an adaptive response to be implemented as necessary) its timing has not been defined, however, it would likely occur after the construction works associated with the offshore export cable have taken place (i.e. post impact).

3.42 Hornsea Three could readily evidence the removal of material from the SACs as the material would be brought to shore. The proposed Sandbanks Compensation Plan to be produced for this measure would need to set out measures to re-purpose or responsibly dispose of any removed material.