



Hornsea Three Sandbank Implementation Plan

Request for Further Information: Change log

 Orsted

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Author	Royal HaskoningDHV
Checked by	Rosalyn Jones
Approved by	Karma Leyland
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Acronyms

Acronym	Definition
AoS	Area of Search
BEIS	Department for Business, Energy, and Industrial Strategy
DCO	Development Consent Order
DDV	Drop Down Video
Defra	Department for Environment Food & Rural Affairs
EIA	Environmental Impact Assessment
EIFCA	Eastern Inshore Fisheries and Conservation Authority
EMP	Environmental Monitoring Plan
JNCC	Joint Nature Conservation Committee
MLA	Marine License Application
MMO	Marine Management Organisation
NNSSR	North Norfolk Sandbanks and Saturn Reef
NFFO	National Federation of Fishermen's Organisations
SAC	Special Area of Conservation
SBIP	Sandbanks Implementation Plan ¹
SG	Steering Group
SNCB	Statutory Nature Conservation Bodies
SoS	Secretary of State
UXO	Unexploded Ordnance
WNNC	Wash and North Norfolk Coast
WROV	Work-class Remotely Operated Vehicle

¹ Acronym chosen so as not to be confused with Site Integrity Plan (SIP)

1 Introduction

1.1 Purpose of this document

1. As required by Schedule 14 Part 2 of the Hornsea Project Three Offshore Wind Farm (Hornsea Three) Development Consent Order (DCO), Hornsea Three submitted Sandbank Implementation Plans (SBIPs) for The Wash and North Norfolk Coast (WNNC) Special Area of Conservation (SAC) and the North Norfolk Sandbanks and Saturn Reef (NNSSR) SAC, and supporting documents, to the Department for Business, Energy and Industrial Strategy (BEIS) for approval on December 1st 2021.
2. Following this submission, BEIS conducted a statutory consultation and invited comment from core members of the benthic compensation Steering Group (SG) who are the named consultees in Schedule 14 Part 2 of the DCO (Joint Nature Conservation Committee (JNCC), Natural England and the Marine Management Organisation (MMO))². Consultation commenced on 3rd December 2021 and closed on 21st January 2022.
3. In response to BEIS, the MMO confirmed that all comments previously raised as part of the SG consultation have been satisfactorily addressed, and MMO have no outstanding comments³. A joint submission made by JNCC and Natural England acknowledged several comments raised during the SG consultation have been closed, however there remain outstanding areas of misalignment⁴. The joint submission from JNCC and Natural England noted that '*Natural England and JNCC believe Hornsea Project Three have demonstrated they can meet the SoS's requirements as laid out within the DCO*'.
4. Following close of the BEIS-led statutory consultation, Hornsea Three received a request for further information from BEIS on 8th February 2022. In summary, BEIS requested Hornsea Three give further consideration to those comments marked as outstanding in Appendix 2⁵ of the joint response submitted by JNCC and Natural England, and provide further rationale on specific aspects of the marine debris removal campaign and long term debris reduction measures (the exact requests are captured in [Table 1](#)).
5. This document has been drafted in response to BEIS request for further information and Hornsea Three is pleased to provide this further information to support BEIS approval of the SBIPs. Further consultation with Natural England and JNCC has been conducted to support the development of this document.
6. As the subject of what constitutes appropriate compensation has been previously raised by consultees in relation to the Hornsea Three DCO conditions, a standalone high-level summary of Hornsea Three's position in support of the compensation measures was included within the Consultation Summary (07124534_A) submitted to support the SBIPs. As such, Hornsea Three have not reiterated that information in this document and refer BEIS to the rationale provided in the Consultation Summary⁶.

1.2 Structure of this document

7. This document is comprised of the following sections:
 - **Section 1:** Provides an overview of the purpose of this document and approach to developing this response to a request for further information from BEIS.
 - **Section 2:** Provides [Table 1](#) as the change log which provides Hornsea Three response to comments received and indicates where documents have been updated.

1.3 Document updates

8. Hornsea Three have considered the request for further information and has updated the following documents in response:

² [EN010080-003623-Hornsea Three Letter Inviting Comments on SBIPS 3 Dec 2021.pdf \(planninginspectorate.gov.uk\)](#)

³ [EN010080-003637-Final SBIP response to PINS.pdf \(planninginspectorate.gov.uk\)](#)

⁴ [EN010080-003633-EN010080 Hornsea Three SBIP SNCB comments letter Final.pdf \(planninginspectorate.gov.uk\)](#)

⁵ [EN010080-003634-EN010080 Hornsea Three SBIP SNCB comments Appendix 2 Final.pdf \(planninginspectorate.gov.uk\)](#)

⁶ [EN010080-003630-Hornsea Three Sandbank Implementation Plans Consultation Summary \(07124534_A\) Redacted.pdf \(planninginspectorate.gov.uk\)](#)

- NNSSR SBIP (07122823_A);
- WNNC SBIP (07103743_A);
- Appendix 1 Marine Debris Removal Campaign: Desktop Study (07108734_A); and
- Appendix 2 Environmental Monitoring Plan (07126576_A).

9. Detail of the specific updates to the documents is provided in the change log provided as **Table 1**.

10. Hornsea Three has not updated the following documents as no further comments were received in relation to these documents:

- Appendix 3 Disposal Technical Study (07154337_A); and
- Consultation Summary (07124534_A).

1.4 Further consultation

11. Hornsea Three notes that the updates to the SBIPs, as detailed in **Table 1**, have been supported with a consultation meeting held with Natural England and JNCC on 9th March 2022. Consultation was focussed in relation to updates to the scope of the marine debris removal campaign (Comment ID New Comment 12 and New Comment 13 in **Table 1**), monitoring to be conducted following marine debris removal (Comment ID 96 in **Table 1**) and the decision tree to be used during the marine debris removal (Comment ID 103, 107, 119, 121, 131, 147, New Comment 10 and New Comment 14 in **Table 1**).

12. The MMO have also been informed of these updates during a meeting held 15th March 2022.

2 Change Log

13. **Table 1** provides the change log detailing the updates made to the SBIPs documentation as outlined in **Section 1.3**. **Table 1** provides the:

- Comment ID number: this number is linked to the Consultation Summary (07124534_A) submitted to BEIS on December 1st 2021 to support the SBIPs. This approach is to ensure continuity between that document and this request for further information and to indicate which comments received have been provided a response during SG consultation;
- Consultee name;
- Document updates: specifying which documents, and document sections, have been updated following BEIS request for further information;
- Comment received during SG consultation and Hornsea Three response at time of SBIPs submission. These columns are copied from the Consultation Summary (07124534_A) to provide BEIS with this further detail where comments have been provided a response during SG consultation;
- Stakeholder comment received following BEIS statutory consultation; and
- Hornsea Three response and rationale for document update.

14. Hornsea Three notes that all responses in **Table 1** are relevant to both WNNC and NNSSR SBIPs unless specifically stated.

Table 1: Summary of outstanding comments and updates to SBIPs.

Comment ID Number (link to Consultation Summary)	Consultee	Document Updates	Comment received during SG consultation	Response / where addressed in SBIPs prior to submission	Stakeholder comment received	Rationale underpinning document update
Schedule 14 Part 2 Requirement 13 (a) Annex 1 reef						
No comments were received under this requirement.						
Schedule 14 Part 2 Requirement 13 (b) Disposal of dredged material						
No comments were received under this requirement.						
Schedule 14 Part 2 Requirement 13 (c) Marine debris removal campaign						
96	Natural England and JNCC	<p>NNSSR SBIP (07122823_A) and WNNC SBIP (07103743_A).</p> <p>Section 6.10.2</p>	<p>Natural England and JNCC remain concerned that the anticipated field report, which will be submitted to the Secretary of State, and the subsequent summary report seem to be the only measure of success for the removal campaign, neither of which provide any indication of the seabed footprint that will be impacted by the debris removal. We also note that no monitoring of seabed recovery will be undertaken and consequently the impacts of the intervention will not be understood or quantified.</p>	<p>Hornsea Three notes that success is demonstration of compliance with the DCO requirement (i.e., removal of debris from the required AoS). The reporting which will be drafted following completion of the debris removal campaign will provide information with regard to debris direct and indirect footprints and the number of targets removed, however this is not linked to success of the campaign. Hornsea Three notes that following receipt of comment on second draft SBIPs 25/10/21 'Natural England welcomes the inclusion of the 'trigger level' and thresholds for removal and adoption of the Orsted's adaptive management approach'.</p> <p>Hornsea Three have provided provision for post-removal monitoring in Section 6.10.2 of NNSSR and WNNC SBIPs in response to the request from SNCBs.</p>	<p>We note that a monitoring section has now been included in Section 6. And that 5 locations where an object larger than 10 m has been removed will be monitored. However, there is currently limited information on how and when monitoring will take place. We assume because reference is made elsewhere in the SBIP to tying this monitoring in with the DML monitoring requirements, that this is unlikely to occur immediately after removal. Therefore, comparisons between surveys immediately after removal and subsequent years to demonstrate the full extent of recovery will not be possible.</p> <p>JNCC and NE reiterate that we do not consider that looking at the nature of epifauna assemblage change to be an appropriate part of monitoring, given that in many sandbank habitats, mobile and sessile epifauna may be sparse and not major parts of characteristic communities. We note that the survey methodology referred to relates solely to geophysical surveys and Drop Down Video (DDV). As such we understand that Hornsea Three means to survey epifauna only with no infaunal analysis.</p>	<p>Hornsea Three notes that monitoring priority will be given to locations where larger objects have been removed to increase the likelihood of identifying remaining seabed impressions one year following marine debris removal. However, monitoring is not contingent on identifying targets of greater than 10 m in size. If items of that size are not removed, then the locations where the next largest items have been removed will be selected as the five monitoring locations. Text has been added in Section 6.10.2 to clarify this further.</p> <p>The monitoring will be conducted immediately post-removal (utilising the Work-class Remotely Operated Vehicle (WROV) to collect the required data) to establish a baseline and one year following removal of the marine debris (utilising geophysical and Drop Down Video (DDV) survey) and is specifically designed to demonstrate habitat recovery against the baseline. Text has been added in Section 6.10.2 to clarify this further. This has been clarified with SNCBs during a consultation meeting held between Hornsea Three and SNCBs on March 9th.</p> <p>Hornsea Three cannot identify references to monitoring requirements under the deemed Marine Licenses in the WNNC and NNSSR SBIPs, however Hornsea Three does note that vessel sharing may occur should other monitoring in relation to Hornsea Three need to be conducted across the same time period, however this will not compromise the quality of the monitoring being conducted in relation to the marine debris removal.</p> <p>Hornsea Three does not consider the monitoring of infauna to be appropriate or proportionate for the following reasons:</p> <ul style="list-style-type: none"> There is a high degree of predictability which can indicate that infauna has recovered if the sandbank feature has recovered, and it is a widely accepted assumption that infauna will

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						<p>recolonise an area once the habitat is available and similar to what was present prior to a disturbance event. This has been derived through many years of monitoring recovery of sedimentary habitats following dredging and aggregate extraction activity. The main characteristics that affect recovery are known to be the habitat type and the mobility of the substrate. Both of these characteristics are improved following removal of debris and will be monitored using the methodology secured in the WNNC and NNSSR SBIPs. Habitat type (compared to the surrounding area) and to some extent mobility (through any ripples or other surface marks) can be observed through the DDV surveys and geophysical surveys.</p> <ul style="list-style-type: none"> • Changes to infauna will not determine whether the sandbank is functioning as it should, this will be derived from habitat characteristics. • Monitoring of habitat through the methodology secured in the WNNC and NNSSR SBIPs may provide incidental evidence and signs of infaunal colonisation, such as worm casts or burrow holes. • Hornsea Three is concerned that conducting infaunal monitoring is not proportionate to the scale of the marine debris removal, particularly in areas of sandbank which are generally known to have sparse infaunal communities. The costs of sampling in the context of answering the questions of recovery of an area are considered to be highly disproportionate when other proxies can be confidently used to determine recovery. Conducting infaunal monitoring may set an unhelpful precedent within the industry to conduct infaunal sampling.
103	Natural England and JNCC	<p>NNSSR SBIP (07122823_A) and WNNC SBIP (07103743_A).</p> <p>Figure 12 has been added alongside text updates in Section 6.3.3.3.</p> <p>Section 4.2.</p>	<p>It should be noted that the Natural England S. spinulosa reef map for the WNNC is for the confirmed core reef, and so the assertion that the desktop study is considering all previous reef identified is incorrect. It is NE and JNCC's understanding that a log of all debris encountered will be provided to steering group members as evidence of the scale/type/volume of debris encountered and of how effective this exercise is at dealing with</p>	<p>The DBA considered all available data on reef locations - if Natural England have additional data which should be used in the DBA Hornsea Three would appreciate the provision of this data.</p> <p>The offshore campaign is then structured as such to enable Hornsea Three to then ground truth reef presence/absence and "core" status during Stages 1 and 3 of the debris removal campaign. Section 6.7 of the WNNC and NNSSR SBIPs provides further detail with regard to the content of the reporting</p>	<p>It remains unclear if new geophysical data will be reviewed by the onboard ecologist prior to the commencement of the debris removal, or if historic geophysical data and then real time ROV footage will be used to confirm present/absence of reef. This should be clarified.</p> <p>The credentials of the benthic ecologist should be shared with the Benthic Steering Group.</p>	<p>Hornsea Three refers to Section 6.3.3 of the WNNC and NNSSR SBIPs which outlines the survey sequence of events. Stage 1 of the campaign comprises the collection of new geophysical survey data, and Stage 2 comprises the analysis of this new geophysical data for seafloor targets (potential debris) but also to identify areas of biogenic reef, and other sensitive features, which will be considered as exclusion zones. The on-vessel benthic ecologist will ensure that the exclusion zones are maintained throughout Stage 3 and</p>

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			<p>different debris types. The log should include information on:</p> <ul style="list-style-type: none"> - the location, size, and nature of the debris; - whether the debris was recovered, a recovery was attempted and aborted, or if the debris was left in situ. 	<p>which includes that information requested by SNCBs.</p>	<p>Natural England wishes to see further information on the decision tree to be followed by the onboard ecologist to determine if the long term ecological benefit to the geogenic reef substrate is greater than the single localised disturbance impact experienced as part of the removal activities.</p>	<p>additionally review the real time WROV footage to confirm absence of biogenic reef before marine debris removal commences. The decision tree which has been updated in the WNNC and NNSSR SBIPs (see Figure 12) indicates a requirement for the on-vessel benthic ecologist to confirm the absence of biogenic reef at each debris location prior to any seabed contact commencing.</p> <p>The WNNC and NNSSR SBIPs have been updated to secure that the on-vessel ecologist should have a minimum set of credentials and competence level which is considered appropriate for the role that individual will hold. This update is secured in Section 4.2. Hornsea Three notes that the requirements must not be specific to a certain individual to avoid campaign delays should that individual suffer from illness or become otherwise unavailable prior to campaign commencement.</p> <p>Hornsea Three notes that a reduction in jetting to 30 cm maximum in relation to the geogenic reef feature has been drafted into the decision tree which supports the Marine License Application (MLA) and is now shown in Figure 12 of the WNNC and NNSSR SBIPs. At time of SBIPs submission to BEIS (December 1st), this more detailed decision tree was not included in the WNNC and NNSSR SBIPs to allow for consultation, and subsequent amendment, throughout the MLA process. This approach was aligned with Statutory Nature Conservation Bodies (SNCBs) prior to SBIPs submission. Hornsea Three notes that the MMO-led consultation on the MLA remains underway and therefore the decision tree presented in Figure 12 remains subject to change as noted in the footnote accompanying the figure. Comments on the decision tree have been received from Natural England on 15th March and Hornsea Three is confident that the decision tree presented as Figure 12 addresses the concerns raised by SNCBs and can be agreed with SNCBs prior to campaign commencement. This alignment is supported by a consultation meeting held between Hornsea Three and SNCBs on March 9th.</p>
105	Natural England and JNCC	No updates are required in relation to this comment.	More clarity is needed regarding the reference to 'previous surveys' in this section. It is unclear if this is referring to Hornsea Project Three previous surveys or surveys from other projects.	Text has been amended in Section 4.2 of the WNNC and NNSSR SBIPs regarding the term previous surveys. It should be noted that the debris removal	Please see above comment for Point 6 provided above (Comment 103 in this document)	Hornsea Three refers to the response drafted in relation to Comment 103 regarding the approach to collecting geophysical survey data as Stage 1 of

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			It should be noted that the debris removal campaign is proposed in other parts of the SAC to that of the Hornsea Project Three cable route. Please also see our detailed comments on the Appendices below.	campaign will not be implemented within Hornsea Three Order Limits.		the marine debris removal campaign. No further updates are required in relation to this comment.
107	Natural England and JNCC	<p>NNSSR SBIP (07122823_A) and WNNC SBIP (07103743_A).</p> <p>Figure 12 has been added alongside text updates in Section 6.3.3.3.</p>	Natural England and JNCC welcome the use of the WROV during the debris removal process. However, it is assumed that there is likely to need to be further discussion regarding the positioning of the WROV on the seabed to reach the object. Therefore, it will not only be the footprint of the object that needs to be considered in any assessment, but also footprint of the WROV to reach the required location.	Hornsea Three agree that the WROV may interact with the seabed however note that this will introduce localised and minor sediment movement only. Further consideration of this aspect will be considered as part of the Marine License application however is not anticipated to introduce significant impacts to sensitive features. Hornsea Three notes that following receipt of comment on second draft SBIPs 25/10/21, SNCBs agree that 'As long as a decision tree can be agreed, we believe that significant impacts to the interest features of the site can be avoided'.	We welcome that the ROV will do 'fly-bys' to help the benthic ecologist identify the landing location for the WROV and/or whether or not above seabed jetting may be required. It would be helpful to have more detail on the decision tree in relation to this point.	Hornsea Three notes that at the time of SBIPs submission to BEIS (December 1 st), the more detailed decision tree was not included in the WNNC and NNSSR SBIPs to allow for consultation, and subsequent amendment, throughout the MLA process. This approach was aligned with SNCBs prior to SBIPs submission. Hornsea Three notes that the MMO-led consultation on the MLA remains underway and therefore the decision tree presented in Figure 12 remains subject to change as noted in the footnote accompanying the figure. Comments on the decision tree have been received from Natural England on 15 th March and Hornsea Three is confident that the decision tree presented as Figure 12 addresses the concerns raised by SNCBs and can be agreed with SNCBs prior to campaign commencement. This alignment is supported by a consultation meeting held between Hornsea Three and SNCBs on March 9 th .
109	Natural England and JNCC	No updates are required in relation to this comment.	Please note that shipping lanes in The Wash often overlap with areas of reef, for instance, The Well. It is not clear how the removal of debris from mixed sediment will help with the functionality of Annex I sandbanks.	The DBA which is Appendix 1 to the SBIPs outlines that all AoS lie within areas demarcated as Annex I sandbank habitat, as defined in the JNCC MPA mapper. Sandbank features include, as a sub-feature, subtidal mixed sediments which are more likely to be sensitive to disturbance than subtidal sand and therefore the ecological benefit here is considered most important.	This comment remains outstanding.	Hornsea Three notes this response however is unsure what further information can be provided in relation to this comment. A request for further detailed information in relation to this comment was made by Hornsea Three at SG Meeting 7 (09/11/21) however further clarity from SNCBs was not provided.
111	Natural England and JNCC	No updates are required in relation to this comment.	It is not clear from these maps that the area of search only interacts with Annex I sandbanks. It is Natural England and JNCC's understanding is that only Annex I sandbanks will be targeted.	The DBA which is Appendix 1 to the SBIPs specifies that all AoS are located within Annex I sandbank habitat, as defined in the JNCC MPA mapper	Natural England notes there is a preference for more stable coarse and mixed sediment to be targeted for debris removal.	Hornsea Three notes this response.
115	Natural England and JNCC	<p>NNSSR SBIP (07122823_A) and WNNC SBIP (07103743_A).</p> <p>Section 6.10.</p>	Please clarify if monitoring will be undertaken to prove the predictions being made in this section in relation to, for example, indirect scouring of the seabed caused by debris.	Any indirect impacts caused by the presence of debris (such as scour) will be logged by the WROV and this information will be provided in the reporting associated with the debris removal campaign detailed within Section 6.10 of WNNC and NNSSR SBIPs.	We are not aware that this confirmation has been provided.	<p>Hornsea Three notes that this commitment is secured in Section 6.7 of the WNNC and NNSSR SBIPs in relation to the post-campaign reporting 'The report will also include an estimate of the direct footprint of the recovered debris (based on size of each item of debris) and the potential area of seabed that could have been indirectly affected by the debris.'</p> <p>This commitment is further secured in Section 6.10 of the WNNC and NNSSR SBIPs which notes that the detailed report will include consideration of</p>

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						<p>'identification of any areas of scour or habitat damage that are visible around the item of debris'.</p> <p>A sentence has been added to Section 6.10 to note that these aspects which will be reported on are intended to consider predictions made in the WNNC and NNSSR SBIPs, such as scour surrounding debris items.</p>
119	Natural England and JNCC	<p>NNSSR SBIP (07122823_A) and WNNC SBIP (07103743_A).</p> <p>Figure 12 has been added alongside text updates in Section 6.3.3.3.</p>	If Natural England and JNCC are not being consulted between investigations and removal, then a decision tree for the specialist on board should be agreed with the BSG.	A decision tree has been included in Section 6.3.3 of the NNSSR and WNNC SBIPs. A further detailed decision tree will be developed with the WROV contractor and specialists to support the Marine License application.	As noted above within Point 6 (Comment 103 in this document), we wish to see further information on the decision tree to be followed by the onboard ecologist.	Hornsea Three notes that at the time of SBIPs submission to BEIS (December 1 st), the more detailed decision tree was not included in the WNNC and NNSSR SBIPs to allow for consultation, and subsequent amendment, throughout the MLA process. This approach was aligned with SNCBs prior to SBIPs submission. Hornsea Three notes that the MMO-led consultation on the MLA remains underway and therefore the decision tree presented in Figure 12 remains subject to change as noted in the footnote accompanying the figure. Comments on the decision tree have been received from Natural England on 15 th March and Hornsea Three is confident that the decision tree presented as Figure 12 addresses the concerns raised by SNCBs and can be agreed with SNCBs prior to campaign commencement. This alignment is supported by a consultation meeting held between Hornsea Three and SNCBs on March 9 th .
121	Natural England and JNCC	<p>NNSSR SBIP (07122823_A) and WNNC SBIP (07103743_A).</p> <p>Figure 12 has been added alongside text updates in Section 6.3.3.3.</p>	We note the proposed methods of removal in this section (and Table 8) and reiterate that methods must not be used that further damage the protected features of the site. There remain outstanding concerns in this regard.	<p>Although Hornsea Three notes that further consultation on impacts resulting from the debris removal can be considered during the Marine License application, Hornsea Three would appreciate further information with regard to impact pathways of concern to SNCBs. The debris removal has been designed to minimise all impacts to the surrounding environment, particularly sensitive features.</p> <p>Hornsea Three notes that following receipt of comment on second draft SBIPs 25/10/21, SNCBs agree that 'As long as a decision tree can be agreed, we believe that significant impacts to the interest features of the site can be avoided'.</p>	As long as a decision tree can be agreed, we believe that significant impacts to the interest features of the site can be avoided.	Hornsea Three notes that at the time of SBIPs submission to BEIS (December 1 st), the more detailed decision tree was not included in the WNNC and NNSSR SBIPs to allow for consultation, and subsequent amendment, throughout the MLA process. This approach was aligned with SNCBs prior to SBIPs submission. Hornsea Three notes that the MMO-led consultation on the MLA remains underway and therefore the decision tree presented in Figure 12 remains subject to change as noted in the footnote accompanying the figure. Comments on the decision tree have been received from Natural England on 15 th March and Hornsea Three is confident that the decision tree presented as Figure 12 addresses the concerns raised by SNCBs and can be agreed with SNCBs prior to campaign commencement. This alignment is supported by a consultation meeting held between Hornsea Three and SNCBs on March 9 th .
123	Natural England and JNCC	No updates are required in relation to this comment.	Natural England and JNCC remain concerned that the anticipated field report, which will be submitted to the Secretary of State (SoS), and	Hornsea Three notes that success is demonstration of compliance with the DCO requirement (i.e., removal of debris from the required AoS). The	Please see response to Point 2 (Comment 96 in this document) provided above.	See response to Comment 96 regarding the approach to monitoring seabed recovery following the marine debris removal campaign.

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			the subsequent summary report seem to be the only measure of success for the removal campaign, neither of which provide any indication of the potential footprint within which debris will be removed. We also note that no monitoring of seabed recovery is expected to be undertaken and therefore are unsure how Hornsea Project Three will demonstrate the impact of their intervention on the feature.	reporting which will be drafted following completion of the debris removal campaign will provide information with regard to debris direct and indirect footprints and the number of targets removed, however this is not linked to success of the campaign. Hornsea Three have provided provision for post-removal monitoring in Section 6.10.2 of NNSSR and WNNC SBIPs in response to the request from SNCBs.		Hornsea Three notes that Section 6.6 of the WNNC and NNSSR SBIPs secures that reporting submitted following completion of the campaign will consider the direct and indirect footprint of the debris removed, alongside the sediment type the debris was removed from as far as practicable.
125	Natural England and JNCC	No updates are required in relation to this comment.	The SNCBs are concerned that the adaptive management approach will potentially increase the area of impacts to the site and therefore this requires further consideration. Adaptive management should be a structured, iterative process of robust decision-making that aims to reduce uncertainty over time. Simply increasing the area of search area does not necessarily ensure that sufficient targets will be found, and risks increasing the area over which the marine debris removal could have a negative impact on site features.	The adaptive management approach increases the likelihood of identifying an area of high debris density, therefore removing maximum debris targets. Hornsea Three would appreciate further information with regard to impact pathways of concern to SNCBs. The debris removal has been designed to minimise all impacts to the surrounding environment, particularly sensitive features. Hornsea Three notes that following receipt of comment on second draft SBIPs 25/10/21 ' <i>Natural England welcomes the inclusion of the 'trigger level' and thresholds for removal and adoption of the Orsted's adaptive management approach</i> '.	Section 6.9.1 Natural England welcomes the inclusion of the 'trigger level' and thresholds for removal and adoption of the adaptive management approach. Though our concerns regarding the extent to which the adaptive management approach providing compensation remain outstanding.	The package of compensation measures secured in the Hornsea Three DCO, as drafted by BEIS, have the aim of removing and preventing debris, and Hornsea Three do not consider alternative compensation measures with different aims as appropriate or proportionate adaptive management. Section 2.4 of the Consultation Summary (07124534_A) provides further information regarding the adaptive management approach.
127	Natural England and JNCC	No updates are required in relation to this comment.	It would be helpful in the SBIP to set out how the target densities were identified to achieve the maximum ecological benefit, and what that ecological benefit looks like.	The target densities were informed by previous surveys and are indicative of the minimum density of debris expected to be found during the Hornsea Three marine debris removal campaign. Actual densities will not be known until the initial geophysical survey is carried out and each target is confirmed as debris using the WROV however considerably larger AoS than are required in the Hornsea Three DCO have been targeted for surveying to identify those areas of high debris density. There is clear ecological benefit in removing debris that is not native to the sandbank environment as outlined in Section 2 of this document.	See point 17 (Comment 125 in this document) above. We are still unclear what the ecological benefit for sandbanks from the debris removal looks like.	Hornsea Three refers to the response provided in relation to Comment 125 regarding adaptive management. The ecological benefit to sandbank habitat is outlined in Section 2 of the Consultation Summary (07124534_A) and supported by provisions for monitoring of feature recovery following the marine debris removal. Hornsea Three is unsure what further information SNCBs are requesting to support this rationale as there is clear ecological benefit in removing debris that is not native to the sandbank environment. This is supported by the Habitats Regulations Assessment drafted for the Boreas Project ⁷ , the Secretary of State noted that ' <i>The removal of marine debris will improve the condition of the habitats for the endemic epifaunal communities by exposing the underlying substrates that constitute the benthic ecosystem. This will contribute to the conservation objectives of the SAC by removing artificial materials from the seabed and reducing adverse pressures on the biological assemblages.</i> '. Hornsea Three supports this position in relation to WNNC and NNSSR SACs.

⁷ Norfolk Boreas - Habitats Regulations Assessment (planninginspectorate.gov.uk)

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131	Natural England and JNCC	<p>NNSSR SBIP (07122823_A) and WNNC SBIP (07103743_A).</p> <p>Figure 12 has been added alongside text updates in Section 6.3.3.3.</p>	As mentioned above, there is geogenic reef as well as biogenic reef within WNNC. This should be captured here.	Text has been included in Section 6.2.1.1 of the NNSSR and WNNC SBIPs in relation to geogenic reef.	Natural England welcomes the consideration of geogenic reef in paragraphs 42 - 44. We advise that Subtidal stony Reef has a Medium-High sensitivity to removal of substratum, with a pressure benchmark of 30 cm. The feature may therefore, be sensitive water jet or pumps to 1m depth. Whilst subtidal stony reef is not a designated feature of the NNSSR SAC, it is an Annex I habitat and a feature of the WNNC.	Hornsea Three notes that a reduction in jetting to 30 cm maximum in relation to the geogenic reef feature has been drafted into the decision tree which supports the MLA and is now shown in Figure 12 of the WNNC and NNSSR SBIPs. At time of SBIPs submission to BEIS (December 1 st), this more detailed decision tree was not included in the WNNC and NNSSR SBIPs to allow for consultation, and subsequent amendment, throughout the MLA process. This approach was aligned with SNCBs prior to SBIPs submission. Hornsea Three notes that the MMO-led consultation on the MLA remains underway and therefore the decision tree presented in Figure 12 remains subject to change as noted in the footnote accompanying the figure. Comments on the decision tree have been received from Natural England on 15 th March and Hornsea Three is confident that the decision tree presented as Figure 12 addresses the concerns raised by SNCBs and can be agreed with SNCBs prior to campaign commencement. This alignment is supported by a consultation meeting held between Hornsea Three and SNCBs on March 9 th .
133	Natural England and JNCC	No updates are required in relation to this comment.	We would like to request if any survey data can be shared with Natural England and JNCC to help inform further management of the site.	All data collected during the offshore campaign will be provided to Natural England and JNCC to help inform further management of the site. This has been included in Section 6.7 of WNNC and NNSSR SBIPs.	We note that reports will be made available, but we query whether this will also include the metadata behind those reports/figures, which would provide important context to the reports.	Hornsea Three refers to Section 6.10.2 of the WNNC and NNSSR SBIPs which secures 'Where requested by SG members, supporting metadata can be provided.'
135	Natural England and JNCC	No updates are required in relation to this comment.	We would welcome as a minimum a proportion of locations being revisited to demonstrate that recovery has occurred and is rapid, as this currently remains an evidence gap and may help with wider discussions about removal of infrastructure and recovery. It would be good to monitor recovery/infill of holes and scour left by debris both before and after removal to add to evidence base that removal of it is contributing to recovery of the feature.	Hornsea Three have provided provision for post-removal monitoring in Section 6.10.2 of NNSSR and WNNC SBIPs in response to the request from SNCBs.	See response to Point 2 (Comment 96 in this document) provided above.	Hornsea Three refers to the response provided in relation to Comment 96 regarding post-removal monitoring of seabed recovery.
147		<p>NNSSR SBIP (07122823_A) and WNNC SBIP (07103743_A).</p> <p>Figure 12 has been added alongside text updates in Section 6.3.3.3.</p>	Please be advised that we have lower confidence that data and reference material dated prior to 2013 remain relevant, given the tidal surge during that year and changes to the marine environment that occurred. Therefore, project specific data will need to be collected to inform the deployment of compensation measures to ensure that there is no further damage to the sites.	Hornsea Three understands that there is no recent bathymetric data (or other data) that covers the entire WNNC or NNSSR SAC areas upon which assessments could have been based. Hence, Hornsea Three had to focus our attention on what was available, which is, older than 2013. Hornsea Three understand that significant storm events can cause changes to sandbanks, particularly by waves near their crests when they are close to the sea surface. However, the sandbanks are likely to recover after the storm to a situation where they	This comment remains outstanding due to limited information provided on the decision tree.	Hornsea Three notes that at the time of SBIPs submission to BEIS (December 1 st), the more detailed decision tree was not included in the WNNC and NNSSR SBIPs to allow for consultation, and subsequent amendment, throughout the MLA process. This approach was aligned with SNCBs prior to SBIPs submission. Hornsea Three notes that the MMO-led consultation on the MLA remains underway and therefore the decision tree presented in Figure 12 remains subject to change as noted in the footnote accompanying the figure.

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				are dynamically stable with the more typical condition, which is driven by tidal currents. Although the storms may cause short-term changes induced by waves, Hornsea Three understand that they would not be long-lasting, and the sand banks would recover to a morphology similar to before the storm driven by the predominant currents. Additionally, storms have been occurring for many centuries before the recent 2013 storms and so they are part of the natural process of sandbank development and evolution which is described in the data/information that we present in the DBA, which is relevant to the discussion of how the sandbanks function at a landscape-scale in the WNNC and NNSSR SACs.		Comments on the decision tree have been received from Natural England on 15 th March and Hornsea Three is confident that the decision tree presented as Figure 1.2 addresses the concerns raised by SNCBs and can be agreed with SNCBs prior to campaign commencement. This alignment is supported by a consultation meeting held between Hornsea Three and SNCBs on March 9 th .
149	Natural England and JNCC	Appendix 1 (07418349_A). Section 4.1.	Whilst we recognise the intention may have been to identify locations with greater benefits to sediment transport, the SNCBs advise against ranking the designated site importance of Annex I sandbanks on their ability to influence sediment transportation within the site and wider environment. This is not a key principle for designation and is not part of conservation objectives on the site. No one sandbank is more important than another.	Accepted and appreciate the comment. The discussion in Sections 4.1 and 4.2 of the DBA have been changed to reflect this.	Natural England advises that this section should make reference to both sediment processes and conservation objectives.	Hornsea Three notes that these sections of Appendix 1 to the SBIPs relate to sediment transport as a potential driver of accumulation of marine debris within the WNNC and NNSSR SACs in order to define appropriate Area of Search (AoS). Section 4.1 has been updated to include a section reference to where detail of the conservation objectives is provided, however including that detail within this section in relation to the conservation objectives of the WNNC and NNSSR SACs is not considered relevant to the section aim.
157	Natural England and JNCC	No updates are required in relation to this comment.	Given The Wash has been an active bombing range and surrounded by RAF bases since the war there is a high probability that UXO will be identified. Whilst it is stated that UXO will be not removed as part of the debris removal campaign, there is the potential that identified UXO may ultimately need to be removed or managed as a health and safety matter. This was the case during the Race Bank cable installation.	Hornsea Three will not remove any UXO as part of the marine debris removal campaign. UXO locations will be recorded, excluded, and avoided in line with the CIRIA guidance (2015). The benthic compensation measures (including marine debris removal campaign) are separate from any cable installation works and therefore HSE risk can be managed differently. As part of the marine debris removal campaign, Hornsea Three will not remove / detonate identified UXOs; instead, and in line with CIRIA guidance on UXOs for the construction industry (2009), Hornsea Three will be responsible for reporting identified UXOs to HM Coastguard in the first instance. The Marine License application for the marine debris removal campaign will not include an application for UXO detonations.	This concern remains outstanding.	Hornsea Three notes the previous rationale provided in response to this comment. Unexploded Ordnance (UXO) will not be removed as part of the marine debris removal campaign and permission for this activity will not be secured in the Marine License which will support the marine debris removal campaign. Hornsea Three further notes that the circumstances in relation to the Race Bank UXO removal campaign are significantly different. Where contractors will be conducting cable installation works in close proximity to a UXO, there is a clear safety case to remove that UXO as the cable installation must proceed. In relation to the marine debris removal campaign, an avoidance approach can be adopted and, as there is no ongoing safety case, the UXO can remain <i>in situ</i> in line with CIRIA guidance (2009). Hornsea Three notes that UXO are routinely left <i>in situ</i> (and infrastructure diverted to avoid the need

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						for removal) and HM Coastguard does not see necessary to undertake further removal activities.
159	Natural England and JNCC	No updates are required in relation to this comment.	The SNCBs would expect the most up to date reef data to inform the areas of search, noting that Sabellaria reef can establish with 12 months. Any older data increase the risk of Sabellaria spinulosa reef being present.	Clarifying information has been added to Section 5 of Appendix 1 to the SBIPs confirming that any areas of new reef, identified during Stages 1 or 3 of the campaign would be avoided with the appropriate buffers applied.	See our comment at Point 6 (Comment 103 in this document) above.	Hornsea Three refers to the response drafted in relation to Comment 103 regarding the approach to collecting geophysical survey data as Stage 1 of the marine debris removal campaign. No further updates are required in relation to this comment.
161	Natural England and JNCC	No updates are required in relation to this comment.	The SNCBs are concerned in relation to the proposal to focus on coarser sediment as this mostly likely to be location where Annex I reef is located.	Coarser sediment is targeted as it more likely to be impacted by cable protection deployment and less sensitive to disturbance than finer sediment types. Text has been included in Section 6.2.1 of the NNSSR and WNNC SBIPs to provide additional justification on this point. Hornsea Three notes that following receipt of comment on second draft SBIPs 25/10/21, SNCBs agree that <i>'As long as a decision tree can be agreed, we believe that significant impacts to the interest features of the site can be avoided'</i> .	See our comment at point 6 (Comment 103 in this document) above.	Hornsea Three refers to the response drafted in relation to Comment 103 regarding the approach to collecting geophysical survey data as Stage 1 of the marine debris removal campaign and management of biogenic and geogenic reef. No further updates are required in relation to this comment.
165	Natural England and JNCC	No updates are required in relation to this comment.	We would expect any monitoring of the recovery of the areas of the SACs impacted by the development to also include those areas identified for compensation. This is needed to ascertain whether said compensation has been successful in the context of the conservation objectives of the designated site.	Hornsea Three have provided provision for post-removal monitoring in Section 6.10.2 of NNSSR and WNNC SBIPs in response to the request from SNCBs. However, this monitoring is secured in the SBIPs and is not a requirement of the EMP. The DCO requirement 13 (e) does not link to the marine debris removal campaign and sits as a separate piece of work to investigate the specific effects of cable protection in relation to sediment and epifauna.	See our comment to Point 2 (comment 96 in this document) above.	Hornsea Three refers to the response provided in relation to Comment 96 regarding post-removal monitoring of seabed recovery.
New Comment 1	Natural England and JNCC	NNSSR SBIP (07122823_A) and WNNC SBIP (07103743_A). Section 6.10.2.	Comment not received during SG consultation.		Natural England note that compliance with the DCO will be considered complete if debris removal is carried out in the area of search, irrespective of the number of pieces of debris that will be successfully removed, and irrespective of the findings of any monitoring against the conservation objectives of the site. We note that there is currently no plan to submit monitoring of areas post removal to the SoS or BSC. It is therefore unclear how HP3 propose to demonstrate to Regulators and SNCBs that the compensation has been effective.	Hornsea Three notes that success is demonstration of compliance with the DCO requirement (i.e., removal of debris from the required AoS) and the SBIPs are structured as such. Adaptive management has been developed, as good practice rather than a statutory requirement, which will be implemented should the number of debris items removed fall below the trigger levels identified in the SBIPs, which SNCBs support. Hornsea Three refers to Section 6.10.2 of the WNNC and NNSSR SBIPs which secures that all monitoring reports, and metadata, will be provided to the SG. Hornsea Three has updated this section to secure that monitoring reports will be provided to the Secretary of State for information to demonstrate the recovery of the feature. The post-removal monitoring will evidence the recovery of the sandbank feature. Should the

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						monitoring a year following removal not demonstrate recovery at all sample locations, Hornsea Three commit to conducting one further monitoring (Year 2) to confirm recovery of the feature. Hornsea Three notes that it is not an unreasonable assumption that removal of an item of surface debris will result in rapid infill and recovery of the feature and therefore although results of post-removal monitoring will be provided to the SG it is not considered that a set of actions should recovery not be demonstrated is required to be agreed.
New Comment 2	Natural England and JNCC	No updates are required in relation to this comment.	Comment not received during SG consultation.		MMO will need to complete a HRA of the marine debris removal alone and in combination with other plans and projects. Should MMO at this point in time find themselves unable to conclude that the marine debris removal campaign could not make a contribution to adverse effects on the SACs in combination, they may find themselves in the unenviable position that an AEoI can't be excluded, given the predicted impacts of the cable protection and the uncertainty around the effectiveness of the compensatory measures. This highlights the importance of ensuring that the SBIPs minimise the risk of debris removal significantly impacting the SACs.	The compensation as defined by BEIS will be implemented, in accordance with the SBIPs approved by BEIS. Hornsea Three agrees that the marine debris removal will not introduce significant impact to the SACs, and SNCBs agree that <i>'As long as a decision tree can be agreed, we believe that significant impacts to the interest features of the site can be avoided'</i> .
New Comment 3	Natural England and JNCC	No updates are required in relation to this comment.	Comment not received during SG consultation.		The SNCBs do not agree that increasing the area of search is adaptive management. Adaptive management is a structured, iterative process of robust decision-making that aims to reduce uncertainty over time. Increasing the search area does not do this and is more simply a way to look at meeting any success goals. That said we welcome the inclusion of the 'trigger level' and thresholds for removal.	The package of compensation measures secured in the Hornsea Three DCO, as drafted by BEIS, have the aim of removing and preventing debris, and Hornsea Three do not consider alternative compensation measures with different aims as appropriate or proportionate adaptive management. Section 2.4 of the Consultation Summary (07124534_A) provides further information regarding the adaptive management approach and specifically details that the approach undertaken to increase the Area of Search (AoS) is adaptive management in relation to the process of removing marine debris. Hornsea Three further notes receipt of the following comment on second draft SBIPs 25/10/21 <i>'Natural England welcomes the inclusion of the 'trigger level' and thresholds for removal and adoption of the Orsted's adaptive management approach'</i> .
New Comment 4	Natural England and JNCC	No updates are required in relation to this comment.	Comment not received during SG consultation.		Natural England note the calculations that in a 6-week campaign period proposed approximately 168 targets may be identified within a SAC.	Hornsea Three is not aware of the evidence which underpins an average item of debris size of 5 m ² per target.

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					<p>Assuming an average size of 5 m² per target, then this potentially may remove debris covering a total area of 4,200m² (i.e. less than half a hectare). Whilst we understand that the campaign can be extended in duration (para. 1.23), it is likely it would have to be extended over a period of approximately 1 year for WNNC and 11 years for NNSR and several adaptive management areas in order to find sufficient marine debris to offer improvements in area similar to those that will suffer from AEol. The worst-case scenario (WCS) area of impact to Annex I habitats from the Hornsea Three OWF will be a long term/permanent loss of 41.80 ha in NNSR SAC and 2.77 ha in WNNC SAC. Natural England therefore consider that the area where marine debris may be removed during the one-off activity is not sufficient to provide adequate compensation in lines with EC compensation ratios guidance.</p>	<p>Hornsea Three notes the DCO requirement to remove debris identified from within the AoS identified and the campaign is structured to deliver this.</p> <p>Hornsea Three further notes that debris in the WNNC and NNSR SACs is not only having a direct footprint impact but introduces indirect impact to the feature through scour and sediment availability to the wider sediment transport system. These further aspects must be considered alongside the direct footprint of the debris removed and are included within monitoring objectives set out in Section 6.10 in the WNNC and NNSR SBIPs.</p> <p>Hornsea Three reiterates that the deployment of cable protection is a last option to achieve cable burial and Hornsea Three continue to work towards deployment of minimum cable protection.</p> <p>Hornsea Three further notes that the compensation being delivered does not comprise of one debris removal campaign alone. There are several long-term debris reduction measures, which will be active through the full operational life of Hornsea Three, secured in the SBIPs which will result in prevention of debris entering the WNNC and NNSR SACs.</p>
New Comment 5	Natural England and JNCC	<p>NNSR SBIP (07122823_A) and WNNC SBIP (07103743_A).</p> <p>Section 6.10.2.</p>	Comment not received during SG consultation.		<p>Natural England note the applicant's clarification that post removal monitoring is not a requirement of the DCO. Natural England welcome that the applicant has included monitoring following debris removal. However, Natural England consider that the monitoring of 1 to 5 areas where <10 m+ debris is removed, if areas can be relocated, 1 year post consent, with Drop Down Video but no infaunal sampling, would be insufficient for Hornsea Three to demonstrate to SNCBs that the compensation had been effective and supports the conservation objectives of the sites.</p> <p>Natural England and JNCC wish to highlight that we do not consider that looking at the nature of epifauna assemblage change to be an appropriate part of monitoring, given that in many sandbank habitats, mobile and sessile epifauna may be sparse and not major parts of characteristic communities. We note that the survey methodology relates solely to geophysical surveys</p>	<p>Hornsea Three notes that monitoring priority will be given to locations where larger objects have been removed to increase the likelihood of identifying remaining seabed impressions one year following marine debris removal. However, monitoring is not contingent on identifying targets of greater than 10 m in size. If items of that size are not removed, then the locations where the next largest items have been removed will be selected as the five monitoring locations. Text has been added in Section 6.10.2 to clarify this further.</p> <p>Hornsea Three notes that the monitoring approach is designed specifically to monitor sediment function, at wide, system functionality scale and local to the debris removal locations respectively. If epifauna is recorded during DDV surveys it will be noted, however the survey is designed to monitor sediment recovery rather than focus on epifauna specifically. The conservation objectives for the WNNC and NNSR SACs include maintaining or</p>

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					and Drop Down Video (DDV) and do not agree that monitoring of habitat characteristics through such measures provides an appropriate proxy for infauna analysis.	<p>restoring: the extent and distribution of qualifying natural habitats; and the structure and function of qualifying natural habitats. The monitoring of habitat that is restored following debris removal (affecting a qualifying natural habitat) is therefore designed to provide evidence that this conservation objective is being supported by the debris removal.</p> <p>The infaunal component of sandbank habitats is also considered to be sparse and the monitoring of habitat recovery provides a proxy for species recovery given the extensive amount of data available on infaunal recovery related to the habitat characteristics sediment type and mobility. These two characteristics (sediment type and mobility) are the key determinants for infaunal benthic recovery of a habitat, as has been shown from the extensive studies undertaken for the aggregates industry. Any infauna in the surrounding area will re-colonise the habitat once these two characteristics have recovered following removal of debris and the monitoring proposed will collect data in relation to those two characteristics.</p>
New Comment 6	Natural England and JNCC	No updates are required in relation to this comment.	Comment not received during SG consultation.		SNCB do not believe that sufficient debris could be collected from within the Areas of Search to act as compensation for the adverse effect to NNSSR SAC.	Hornsea Three notes the SNCB position with regard to the adequacy of the compensation measures secured in the Hornsea Three DCO.
New Comment 7	Natural England and JNCC	NNSSR SBIP (07122823_A) and WNNC SBIP (07103743_A). Table 7.	Comment not received during SG consultation.		Excluded areas should encompass areas of Sabellaria identified as 'low reef (Gubbay, 2007).	<p>Hornsea Three further commits to considering any areas of 'low reef' as exclusion zones. This has been updated in Table 7 of the WNNC and NNSSR SBIPs</p> <p>It should be noted that Hornsea Three does not consider this necessarily proportionate to the feature, however, note SNCBs concern regarding the novel nature of the activity and therefore in this circumstance are comfortable considering 'low' reef as an exclusion zone.</p>
New Comment 8	Natural England and JNCC	No updates are required in relation to this comment.	Comment not received during SG consultation.		Natural England concur that debris removal may be considered to offer environmental benefits or improvement in relation to the Marine Strategy Framework Directive and Marine Plans, however marine litter has not been identified as a pressure in relation to the conservation objectives of either the NNSSR or WNNC SACs.	<p>Hornsea Three refers to Paragraph 17 of the Consultation Summary (07124534_A) which addresses this comment in full.</p> <p>Hornsea Three further notes in relation the Habitats Regulations Assessment drafted for the Boreas Project⁶, the Secretary of State noted that <i>'The removal of marine debris will improve the condition of the habitats for the endemic epifaunal communities by exposing the underlying substrates</i></p>

⁶ Norfolk Boreas - Habitats Regulations Assessment (planninginspectorate.gov.uk)

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						<i>that constitute the benthic ecosystem. This will contribute to the conservation objectives of the SAC by removing artificial materials from the seabed and reducing adverse pressures on the biological assemblages.</i> Hornsea Three supports this position in relation to WNNC and NNSSR SACs.
New Comment 9	Natural England and JNCC	No updates are required in relation to this comment.	Comment not received during SG consultation.		Natural England data on Annex I sandbank distribution in WNNC SAC (available from Defra's MAGiC mapping application) has also been referred to. This data indicates a wider distribution of sandbank habitat in the SAC than the JNCC data; however, has not been presented herein given that the JNCC data provides a more conservative distribution of sandbank habitat considered appropriate for this assessment.	Hornsea Three notes that the text provided in the SNCB response has been taken from Appendix 1 and is copy / paste from that document (see Section 7.1.1 paragraph 82 of Appendix 1), however a comment has not been provided in relation to it. Hornsea Three supports the rationale underpinning the sandbank distribution data used to inform Appendix 1 to the SBIPs and no updates to that process have been undertaken.
New Comment 10	Natural England and JNCC	NNSSR SBIP (07122823_A) and WNNC SBIP (07103743_A). Figure 12 has been added alongside text updates in Section 6.3.3.3.	Comment not received during SG consultation.		There is currently insufficient information included in the decision tree for SNCB to have confidence that Annex I habitat could be avoided.	Hornsea Three notes that at the time of SBIPs submission to BEIS (December 1 st), the more detailed decision tree was not included in the WNNC and NNSSR SBIPs to allow for consultation, and subsequent amendment, throughout the MLA process. This approach was aligned with SNCBs prior to SBIPs submission. Hornsea Three notes that the MMO-led consultation on the MLA remains underway and therefore the decision tree presented in Figure 12 remains subject to change as noted in the footnote accompanying the figure. Comments on the decision tree have been received from Natural England on 15 th March and Hornsea Three is confident that the decision tree presented as Figure 12 addresses the concerns raised by SNCBs and can be agreed with SNCBs prior to campaign commencement. This alignment is supported by a consultation meeting held between Hornsea Three and SNCBs on March 9 th .
New Comment 11	Natural England and JNCC	NNSSR SBIP (07122823_A) and WNNC SBIP (07103743_A). Section 6.10.2 and Section 6.2.1.1.	Comment not received during SG consultation.		There is currently no monitoring proposed specifically in relation to the recovery of geogenic reef, if debris is removed from this habitat.	Hornsea Three further commits that should geogenic reef be identified during the marine debris removal campaign, and an item of debris be removed from this habitat type, this location will be included as an additional monitoring location in addition to the five monitoring locations already secured in Section 6.10.2 of the WNNC and NNSSR SBIPs. This has been confirmed with SNCBs during a consultation meeting held between Hornsea Three and SNCBs on March 9 th . This further commitment has been drafted into Section 6.10.2 of the WNNC and NNSSR SBIPs and

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New Comment 12	BEIS	<p>NNSSR SBIP (07122823_A) and WNNC SBIP (07103743_A).</p> <p>Addition of Section 6.3.5.1 and text added to Section 6.1.</p>	n/a		<p>BEIS understand that the exact locations of the debris removal campaign and the total area of debris that will be identified within them is not yet known. However, we note from the initial surveys, and details provided of the removal campaign to be carried out, that certain types of debris (including very large items and fishing nets) will not be removed and that the actual amount of debris removed from the areas identified in the SACs may therefore be less than originally anticipated. The original sandbanks compensation strategy anticipated that areas subject to the compensation measures would be cleared of marine debris, and we would ask for further details to be provided as to the range of debris collection methods considered so that larger objects and fishing nets can be targeted by the removal campaign.</p>	<p>a reference to this commitment included in Section 6.2.1.1.</p> <p>Hornsea Three notes that the AoS are identified in the WNNC and NNSSR SBIPs, however the total quantity of debris removed will not be known until the campaign is underway.</p> <p>The vessel(s) mobilised to undertake Stage 3 of the campaign (the debris identification and removal) are capable of removing items up to the sizes noted in Section 6.3.3.4 of the WNNC and NNSSR SBIPs. Several attachment types and lifting equipment are proposed to ensure debris of different shapes and sizes can be accommodated, and Hornsea Three expect to be able to remove all types of potential fishing gear identified, including pots and large nets up to the sizes and weights identified in the WNNC and NNSSR SBIPs.</p> <p>However, Hornsea Three acknowledges BEIS expectation that all identified items are removed regardless of the capabilities of the vessels mobilised. Therefore, should Hornsea Three identify an item which is beyond the capabilities of the vessels currently mobilised (for example an incredibly large (e.g. 40 foot) shipping container) either due to constraints with the vessel equipment or the marine license constraints (such as sediment movement to a maximum of 1 m depth), Hornsea Three will investigate the item using the WROV and use the images collected to develop a bespoke removal plan which would demonstrate how that item can be removed. This may involve working with a specialist salvage contractor. As these removals may require bespoke methodologies, Hornsea Three would deliver this in a separate campaign (likely the following summer season) and under a separate Marine License. Hornsea Three notes that agreement with the SG would be sought throughout the development of this removal plan, and should alignment not be reached as to the benefit versus impact of removal the item will be left <i>in situ</i>. Hornsea Three notes that removal of such items is subject to HSE risk which will also be considered during consultation with the SG. This commitment has been included in WNNC and NNSSR SBIPs as Section 6.3.5.1 and a cross-reference added in Section 6.1.</p>

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New Comment 13	BEIS	<p>NNSSR SBIP (07122823_A) and WNNC SBIP (07103743_A).</p> <p>Section 6.1 and Section 7.</p>	n/a		<p>Whilst we understand that there may be a rationale for leaving targets <1m in situ, if these and other items are not to be removed, please provide updates to the reports setting out any additional areas to be included in the removal campaign so that the equivalent number of targets can be removed.</p>	<p>This amendment has been consulted on with SNCBs during a consultation meeting held between Hornsea Three and SNCBs on March 9th and SNCBs are aligned with the proposed approach.</p> <p>Hornsea Three notes that the constraint around smaller items is related primarily to the capabilities of the geophysical survey techniques used during Stage 1 of the campaign to identify the seafloor targets. Following further consideration of these techniques and discussion with the appointed Contractor regarding their capabilities, Hornsea Three have amended the SBIPs to confirm that the geophysical survey data collected will be interrogated to identify seafloor targets > 0.5m in size and those identified will be considered for investigation and removal during Stage 3. This has been amended in Section 6.1 of the WNNC and NNSSR SBIPs. This amendment has been consulted on with SNCBs during a consultation meeting held between Hornsea Three and SNCBs on March 9th and SNCBs are aligned with the proposed approach.</p> <p>Additionally, should items smaller than 0.5 m happen to be identified during the campaign (for example entangled in larger items such as fishing nets), removal will be attempted and is considered to be highly achievable with the methodologies proposed unless the item is highly mobile (for example a plastic bag or plastic bottle). This has been clarified in Section 6.1 of the WNNC and NNSSR SBIPs.</p> <p>Hornsea Three notes that the findings of the marine debris removal campaign will inform aspects of the debris reduction and awareness campaign. If several small items are encountered during the debris removal campaign but cannot be removed due to mobility of the item, the awareness campaign can adapt and aim to minimise pollution from those sources rather than remove the item. This has been clarified in Section 7 of the WNNC and NNSSR SBIPs.</p> <p>Hornsea Three notes the preference for the seabed to be 'cleared' of debris and are confident that the campaign delivers this as far as practicable. Alternative approaches which may 'clear' the seabed include grappling and / or trawling which</p>

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						would be towed along the seafloor and may pick up any debris identified. However, this was not considered to be appropriate by Hornsea Three and the SG due to potential impact pathways and therefore has not been progressed as it was considered a Marine License would not be granted for this methodology.
New Comment 14	BEIS	NNSSR SBIP (07122823_A) and WNNC SBIP (07103743_A). Section 6.3.3.2.	n/a		Please could you confirm that the steering group will be consulted at Stage 3 of the marine debris removal campaign, between the investigation of debris and its removal, to ensure that the removal methods will not damage benthic habitats.	<p>Hornsea Three cannot make this confirmation as it is not feasible to conduct consultation following investigation of the debris item by WROV, and removal of that item. This is because removal will be conducted immediately following investigation, often during the same dive by the WROV. Providing sufficient consultation time to the SG (which is expected to be no less than 20-days for a written response to be received) while having a removal vessel on standby introduces risk that the debris item may move or become further buried in sediment, is not proportionate to the potential impact pathways introduced by the marine debris removal activity and introduces significant commercial risk in terms of managing the contract of that vessel.</p> <p>The decision tree is designed to ensure that SNCBs are comfortable with the on-vessel decisions being made and Hornsea Three is confident that the decision tree can be agreed as part of the marine licensing process which is currently underway.</p> <p>Hornsea Three will further commit to consulting with the SG following Stage 2 of the campaign, and prior to commencement of Stage 3 (target investigation), to present the seafloor target list and any exclusion zones identified to the SG for information. This commitment is secured in Section 6.3.3.2.</p>
Schedule 14 Part 2 Requirement 13 (d) awareness campaign						
197	Natural England and JNCC	No updates are required in relation to this comment.	We would like to draw attention to the draft Principles of Compensatory Measures, and in particular point (e) on monitoring the effectiveness of compensation in MPAs.	Noted, no amendment required.	See response to Point 2 (Comment 96 in this document) provided above.	<p>Hornsea Three notes that Comment 96 relates to monitoring of the marine debris removal campaign.</p> <p>Hornsea Three notes that monitoring commitments in relation to the marine debris reduction and awareness campaign measures is secured in Section 7.4 and Table 10 of the WNNC and NNSSR SBIPs.</p>
199	Natural England and JNCC	NNSSR SBIP (07122823_A) and	We note that retrieval of fishing gear by fisherman as a result of the rapid retrieval mechanisms holds the potential for further	Any rapid retrieval techniques will be conducted with vessels who operate in the vicinity of SACs under their normal fishing practices. Hornsea Three	These concerns remain outstanding.	Hornsea Three reiterates, as per Section 7.1.1.1 of the WNNC and NNSSR SBIPs 'Rapid recovery of fishing gear, whilst not changing the methods used

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		<p>WNNC SBIP (07103743_A).</p> <p>Section 7.1.1.</p>	<p>damage to the protected features of the WNNC and NNSSR SAC, depending on the method of retrieval. This paragraph also states that consultation with "some fishers" received a "positive response", yet no guarantee of ongoing buy-in from fishers and commitment to use of appropriate retrieval methods that minimise damage can be provided.</p>	<p>cannot control an activity that already takes place (making retrieval more efficient will reduce impact). Hornsea Three remain in consultation with Kingfisher with regard to the potential supporting project of mapping sensitive areas within WNNC and NNSSR SACs to provide to fishing vessels and hope to provide further information in the final SBIPs submitted to BEIS.</p> <p>Successful gear marker funds have been implemented on the west coast of the UK by Ørsted with high take up of the initiative.</p>		<p>for recovery, would facilitate fishermen in the retrieval of their gear in a more efficient manner (thereby potentially reducing any effects on the seabed from repeated efforts of retrieval). This in turn would potentially reduce the affected seabed area impacted by drifting lost or derelict gear, all of which could reduce the scale of any effect'. Fishing gear is routinely recovered by the fishing industry using a number of techniques, predominantly grappling, and the proposed measure increases the efficiency of this gear recovery but cannot change the technique used.</p> <p>Hornsea Three appreciates SNCB wider concern in terms of impact to SAC features resulting from fishing activity in relation to all fishing practices, including retrieving lost gear, however Hornsea Three is not in the position to alter or suggest methodology amendments to fishing practices which are licensed through the MMO. This approach to deployment of the rapid retrieval measure has been supported throughout SG consultation by National Federation of Fishermen's Organisations (NFFO) and Eastern Inshore Fisheries and Conservation Authority (EIFCA).</p> <p>As part of the awareness campaign (Section 7.1.3 of the WNNC and NNSSR SBIPs), Hornsea Three have committed to promoting best practice guidance on retrieving fishing gear which fishermen can implement. Hornsea Three will further commit to providing this industry-standard guidance to each fisherman who is engaged in the rapid retrieval initiative. This is secured in Section 7.1.1.</p>
New Comment 15	BEIS	<p>NNSSR SBIP (07122823_A) and WNNC SBIP (07103743_A).</p> <p>Section 7.2 and Section 7.3.</p>	n/a		<p>With regards to the marine debris awareness events, please identify the success criteria for these measures, as well as interim milestones which would trigger adaptive management measures</p>	<p>Hornsea Three refers to Section 7.2 and Section 7.3 of the WNNC and NNSSR SBIPs which notes that making the measures listed available to the secured target groups is considered success through compliance with the DCO.</p> <p>Hornsea Three has added further text to Section 7.3 to note that the trigger level for adaptive management is when a measure is no longer viable to implement.</p> <p>Hornsea Three notes that the UK fishing industry, which is the primary target group for the marine debris reduction measures, is consistently fluctuating in terms of vessel numbers and target locations. This will continue to fluctuate through</p>

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						<p>the operation of Hornsea Three considering changes to fishing practices and available fishing locations resulting from increasing Marine Protected Area restrictions and moving fish stocks resulting from rising sea temperatures. For these reasons, it is not appropriate to base trigger levels or milestones on specific numbers of vessels or level of predicted engagement.</p> <p>Hornsea Three is confident that the measures listed will be received well by the fishing industry, as NFFO and EIFCA support these measures, and Hornsea Three is prepared to fund and promote these measures to ensure engagement throughout operation of Hornsea Three. To secure this commitment, further text has been added to Section 7.2 of the WNNC and NNSSR SBIPs which facilitates feedback from those persons declining engagement in the measures and allows Hornsea Three to demonstrate that engagement to promote uptake is ongoing, consistent throughout the life of the project, and present clearly any reasons why engagement by some persons may be low. This reporting will be provided to the Secretary of State to ensure a consistent dialogue with Hornsea Three regarding engagement in these measures is open.</p>
New Comment 16	BEIS	No updates are required in relation to this comment.	n/a		<p>With regards to marine debris reduction, please provide details of how fishers will be incentivised to retrieve lost fishing gear. Please also confirm how you will support fishers with the removal of lost fishing gear, which methods of recovery will be used, and how such methods will avoid harm to benthic habitats.</p>	<p>Fishers are inherently incentivised to retrieve lost gear through economic benefit to their fleet. Any gear lost permanently is required to be replaced, often at high cost to the vessel and wider fleet. Hornsea Three is encouraging greater success and efficiency of retrieval of lost gear by making it easier to locate, either through the deployment of transponders or better gear marking. Hornsea Three is fully funding these initiatives which further incentivises fishing vessels to engage as it is at no additional cost to their operations.</p> <p>In alignment with the response provided to Comment 199, Hornsea Three is not in the position to alter or suggest methodology amendments to fishing practices which are licensed through the MMO. This approach has been supported throughout SG consultation by NFFO and EIFCA. Fishers routinely retrieve gear, which has been lost or improperly marked, through methods licensed by MMO and Hornsea Three cannot comment on</p>

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						whether these methods introduce impact pathways to benthic habitats.
Schedule 14 Part 2 Requirement 13 (e) environmental monitoring						
227	Natural England and JNCC	No updates are required in relation to this comment.	It should be noted that the decommissioning will not be for decades, and therefore will not help projects currently in the initiation phase. We would welcome the industry doing further monitoring of infrastructure removal and recovery before decommissioning.	Hornsea Three appreciate the value in this data, however, cannot conduct infrastructure removal studies at this stage. Post-removal monitoring of marine debris (secured in the SBIPs) may provide further evidence base to the recovery of habitat following removal of hard substrate.	This concern remains outstanding.	<p>Hornsea Three appreciates the value in this data, however, do not consider it proportionate to conduct infrastructure removal studies alongside implement the requirements outlined in Schedule 14 Part 2 of the DCO.</p> <p>Post-debris removal monitoring of locations where large items of marine debris has been removed (as secured in Section 6.10.2 of the WNNC and NNSSR SBIPs) is designed to monitor the recovery of sandbank habitat and is anticipated to add to the evidence base on habitat recovery. This monitoring is designed to directly inform aspects such as infill rates in relation to both the impression left following removal and any scour associated with the item of debris.</p>
229	Natural England and JNCC	Appendix 2 (07126576_A). Section 5.2, Section 5.1 and Table 2.	The MMO will become the regulator of the EMP and all further consultation on the EMP will be conducted with MMO and the relevant SNCBs' We query why the MMO is deemed to be the regulator of this EMP for the SBIPs, given the relevance of its findings to the compensatory measures that the SoS has mandated. We also feel the rest of the Steering Group, should be given the opportunity to provide consultation responses to the EMP, not just the SNCBs.	The MMO will be the regulatory body as agreed with the MMO and BEIS. All relevant stakeholders (including other parties outside of the SNCBs) will be provided with monitoring reports following their approval by MMO. Text within Section 5.2 of Appendix 2 of the SBIPs has been amended to reflect that position.	This comment remains outstanding. Natural England and JNCC are concerned that a compensatory Environmental Monitoring Plan (EMP) is very distinct from a standard EMP. Therefore, we question how any outputs will be openly and transparently consulted upon when the DML condition referred to only relates to the MMO in consultation with the relevant SNCB. We believe that there is a wider requirement for BEIS and other stakeholders to be made aware of the outcomes, not only so that evidence gaps can be filled, but so that lessons can be learnt (even if this is only to modify/standardise monitoring methodologies).	<p>Hornsea Three notes that Appendix 2 of the SBIPs secures that MMO will conduct a consultation on each monitoring report which should include the relevant SNCBs. The wording does not limit MMO in terms of conducting a wider consultation should MMO deem that approach appropriate.</p> <p>Hornsea Three notes that while the SG were invited to comment on Appendix 2 in draft format, Natural England and JNCC were the only members of the SG to provide comment and therefore Hornsea Three query the request for continued inclusion of the wider SG in relation to consultation on monitoring reports.</p> <p>Hornsea Three notes Section 5.2 of Appendix 2 of the SBIPs which secures that <i>'to further increase the evidence base, all monitoring data and reports will be shared with the wider industry through the Crown Estate's Marine Data Exchange and on OWEER once they have been deemed to not be of any commercial sensitivity'</i>.</p> <p>Hornsea Three further commits that all monitoring reports, once approved by the MMO, will be provided directly to BEIS and the SG for information (alongside being made available on the Marine Data Exchange). Section 5.2 of Appendix 2 has been updated to reflect this.</p>

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						Hornsea Three further commits to adding a lessons learned section to each monitoring report to increase the learnings derived from the monitoring secured in the EMP. This has been added to Section 5.1 and Table 2.
233	Natural England and JNCC	No updates are required in relation to this comment.	Natural England is concerned that there is no information provided on who (Ørsted/OFTO) will undertake monitoring in the longer term, and that only the MMO in consultation with the relevant SNCB will be commenting on the effectiveness of the monitoring. We question why BEIS, as having mandated the compensation, and the wider benthic steering group would not be afforded this opportunity.	The MMO will be the regulatory body as agreed with the MMO and BEIS. All relevant stakeholders (including other parties outside of the SNCBs) will be provided with monitoring reports following their approval by MMO. Text within Section 3.2 and 5.2 of Appendix 2 of the SBIPs has been amended to reflect that position. It is anticipated that the monitoring will be conducted by Orsted.	Natural England notes the intention to provide copies of the report to the core steering group members, but it remains unclear how consultation responses and further requirements will be taken forward.	<p>The consultation on, and approval of, each monitoring report will follow the statutory process as routinely conducted by the MMO.</p> <p>Hornsea Three notes that Appendix 2 of the SBIPs secures that MMO will conduct a consultation on each monitoring report which should include the relevant SNCBs. The wording does not limit MMO in terms of conducting a wider consultation should MMO deem that approach appropriate.</p> <p>As detailed in Sections 2.2 and 5.3 of Appendix 2 to the SBIPs, the monitoring reports will be provided to MMO, and any consultation responses received during the MMO statutory consultation is anticipated to inform the need for adaptive monitoring strategies to be implemented.</p>
235	Natural England and JNCC	No updates are required in relation to this comment.	We note that the survey methodology referred to in this section relates solely to geophysical surveys and Drop Down Video (DDV). As such, we understand that Hornsea Project Three mean to survey epifauna only (with no infaunal analysis) and would refer back to a previous comment made stating that "Natural England do not consider that looking at the nature of epifaunal assemblage change to be an appropriate part of monitoring, given that in many sandbank habitats, mobile and sessile epifauna may be sparse and not major parts of characteristic communities".	As per the DCO requirement, Hornsea Three will not be monitoring the infauna and therefore have designed the monitoring methodology accordingly. Hornsea Three notes that changes to epifaunal communities resulting from cable protection presence is a key evidence gap which the monitoring secured in the EMP will address.	Please see response to Point 2 (comment 96 in this document) provided above.	<p>Hornsea Three notes that this comment relates to monitoring under the EMP, and Comment 96 relates to monitoring as part of the marine debris removal campaign and encourages that, despite similar comments on both aspects, the two should be kept separate to avoid confusion.</p> <p>In relation to the request to conduct infaunal monitoring as part of the EMP, Hornsea Three notes that this is not a requirement of the DCO. Additionally, obtaining infaunal samples in close proximity to the cable protection is not possible due to HSE constraints in deploying a large grab in close proximity to an electrical cable. Therefore, samples could only be collected at distance from the cable protection which is unlikely to be effective as any impacts are acknowledged to be highly localised.</p> <p>The monitoring secured in the EMP was developed following review of reports available through the Offshore Wind Environment Evidence Register (OWEER) recently launched by the Crown Estate and developed by JNCC and Defra. The report published as a part of this work (The Crown Estate</p>

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						<p>2019) identifies that the main data gap for impacts relating to and resulting from cable protection is colonisation of epifauna on artificial substrate. A recently published report from Defra (2021) reiterates that the potential ecological consequences arising from the presence of cable protection is a critical knowledge gap and determines that imagery-based survey data could help to fill this knowledge gap. The monitoring secured in the EMP utilised imagery-based survey techniques which is supported by the Defra (2021) report.</p> <p>The infaunal component of sandbank habitats is considered to be sparse and the monitoring of habitat recovery through imagery-based surveys provides a proxy for species recovery given the extensive amount of data available on infaunal recovery related to habitat characteristics such as sediment type and mobility (characteristics which will be monitored using the approach secured in the EMP). These two characteristics (sediment type and mobility) are the key determinants for infaunal benthic recovery of a habitat, as has been shown from the extensive studies undertaken for the aggregates industry. Any infauna in the surrounding area will re-colonise the habitat once these two characteristics have recovered following removal of cable protection.</p>
237	Natural England and JNCC	Appendix 2 (07126576_A). Section 3.1.3.	In determining the timeframes for monitoring, it would be useful to understand what evidence of feature recovery timescales has been used. We would expect any monitoring plan to be tailored to the expected recovery timeframes of the specific features being monitored. This would also apply to any post-decommissioning monitoring (Section 4.4, paragraph 46).	Recovery text has been added to Section 4.4 of Appendix 2 of the SBIPs to provide rationale to the timeframes proposed for monitoring.	Natural England notes that consideration of recovery timeframes has now been included. However, it would be helpful to have monitoring designed to demonstrate that this has occurred within the predicted timeframes.	<p>Hornsea Three refers to Section 3.1.3 and Section 4.5 of Appendix 2 to the SBIPs which details that the monitoring proposed has specifically been designed to monitor recovery and the monitoring frequencies have been selected to test the hypothesis that recovery will occur in the predicted timeframes. Section 3.1.3 of Appendix 2 to the SBIPs has been updated to fully reflect this.</p> <p>Hornsea Three commits to implementing adaptive monitoring should the initial monitoring campaign indicate recovery is occurring at an unexpected timeframe. Section 3.1.3 of Appendix 2 to the SBIPs has been updated to incorporate this commitment.</p>
New Comment 17	Natural England and JNCC	No updates are required in relation to this comment.	Without further evidence Natural England cannot agree with certainty that the placement of cable protection along 6 export cables in the near shore area is unlikely to impact on coastal process/far field effects. Therefore, we would support further	Hornsea Three does not consider it appropriate to run models as part of the monitoring campaign, as any far field effects are not significant (as demonstrated by the EIA). Any effects will be local to the cable protection. Mobile sand banks are expected to migrate over	Natural England note that far field assessments are not proposed. As previously raised, without further evidence Natural England cannot agree with certainty that the placement of cable protection along 6 export cables in the near shore area is unlikely to impact on coastal process/far field	Hornsea Three does not consider it appropriate to run models as part of the monitoring campaign, as the Environmental Impact Assessment (EIA) concluded that any impacts on sandbanks arising from changes to the sediment transport regime are

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			monitoring to determine whether this is the case.	cable protection. The depth of sediment will depend on the rate of migration and the thickness of the sediment pile within the bank. The protection will remain covered until it emerges at the other side of the bank after it has passed over. This would be a very long term effect given the size of a sand bank and is not significant in EIA terms. The purpose of the monitoring would be to determine if impacted areas continue to function as part of the system. Sediment supply to coast is not relevant to habitat loss within the SAC and therefore out of scope for the monitoring programme.	effects. Therefore, we would support further aims, objectives and monitoring to determine whether this is the case.	<p>predicted to be of very limited local spatial extent and magnitude, continuous and reversible.</p> <p>As stated in the ES (Hornsea Three, 2018), the maximum volume of sediment that could potentially accumulate (on the updrift side of the cable protection) is limited by the dimensions of the protection to approximately 3.46 m³ of sediment per metre of cable protection, which is small in both absolute and relative terms. The maximum dimensions of morphological change (seabed lowering) that might result from the maximum temporary reduction in sediment supply are therefore proportionally limited (e.g. a maximum of 0.1 m bed lowering might occur in an area up to 34.6 m downstream of the cable protection, or up to 0.5 m up to 6.92 m downstream, or 0.05 m up to 69.2 m downstream, etc) and is therefore unlikely to measurably affect the form and function of the seabed locally or regionally.</p> <p>As the stable slope approaches the top of the cable protection (up to 2 m above the seabed), the blockage effect of the cable protection will be progressively reduced to near zero and sediment will subsequently be transported directly over the obstacle (via the sediment slope and/or in saltation or suspension) unimpeded, at the naturally occurring ambient rate and direction. Therefore, no far-field effects are expected to occur and are not significant (as demonstrated by the EIA). Hornsea Three does not consider far field assessments appropriate due to the extensive rationale which supports the conclusion of no significant impact in EIA terms.</p>
New Comment 18	Natural England and JNCC	No updates are required in relation to this comment.	Comment not received during SG consultation.		Natural England note the additional post-approval consultation that will be required of us in relation to the EMP, in addition to the usual statutory duties associated with an OWF.	Hornsea Three notes the resource requirement and appreciate SNCB engagement in this additional consultation requirement which will be conducted by the MMO.
New Comment 19	Natural England and JNCC	No updates are required in relation to this comment.	Comment not received during SG consultation.		SNCB are of the opinion that environmental monitoring does not directly compensate for habitat loss resulting from the deployment of cable protection within the NNSR SAC but recognise that DCO condition 13 of Schedule 14 includes Environmental Monitoring Plans (EMPs) for the cable protection deployed within the SACs.	Noted.
New Comment 20	Natural England and JNCC	No updates are required in relation to this comment.	Comment not received during SG consultation.		Natural England and JNCC highlight that monitoring should be undertaken to understand the impact of cable protection, and how its	Hornsea Three agrees that the monitoring secured in the EMP should link to the Conservation Objectives of the WNNC and NNSR SACs.

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					deployment may impact on the achievement of the conservation objectives of the site. We note that, despite having highlighted this previously, there is no provision for monitoring in the context of conservation objectives of the designated sites.	Hornsea Three refers to Section 3.1.2 of Appendix 2 to the SBIPs which details that the monitoring is specifically designed to consider the maintenance of the structure and function of the habitats, and the recovery of the function of the habitat as per the Conservation Objectives of the WNNC SAC and NNSR SAC.
New Comment 21	Natural England and JNCC	Appendix 2 (07126576_A). Section 4.1.2 and Section 4.4.	Comment not received during SG consultation.		There is currently no aim in relation to the hypothesis that all cable protection will be successfully retrieved. Natural England would welcome the inclusion of an objective to quantify the cable protection used during construction and operation and maintenance, and the proportion that is successfully removed and that which could not be removed.	Hornsea Three notes that Section 4.1.2 of Appendix 2 to the SBIPs secures that the volumes of cable protection deployed during construction will be reported under the EMP. This text has been updated to reflect this commitment. It should be noted that the volumes of cable protection which may potentially be deployed through the routine operation and maintenance of Hornsea Three will similarly be required to be reported to the MMO under the relevant license conditions, therefore are content that the EMP post-decommissioning monitoring reports should note the quantities of cable protection which has been deployed. Hornsea Three can similarly provide reporting regarding the quantity of cable protection removed at time of decommissioning. Section 4.4 of Appendix 2 to the SBIPs has been updated to secure this commitment.
New Comment 22	Natural England and JNCC	Appendix 2 (07126576_A). Section 4.1.2.	Comment not received during SG consultation.		Following completion of construction, target sample locations where cable protection has been deployed will be selected for monitoring. It is not clear to Natural England how HP3 will be able to keep to the 1 and 5 km intervals, will this not depend on where cable protection was required and the length of the deployment? Or do they propose to pick the nearest cable protection to the preconstruction transects?	As detailed in Section 4.1.2 of Appendix 2 to the SBIPs, pre-construction transects will be carried out at 1 km and 5 km intervals as locations of cable protection will not be known. Following deployment of cable protection, sample locations will be selected from those areas where cable protection has been deployed, using the same frequency as the pre-construction transect locations (1 km intervals in WNNC, 5 km intervals in NNSR) to ensure that the operational monitoring locations are as close to the pre-construction transect locations as possible. Section 4.1.2 has been updated to reflect this.