



Offshore Petroleum Regulator
for Environment & Decommissioning

Perenco: Hoton Platform Conductor Installation

Habitats Regulations Assessment (HRA)



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**RECORD OF THE HABITATS REGULATIONS ASSESSMENT UNDERTAKEN
UNDER REGULATION 5 OF THE OFFSHORE PETROLEUM ACTIVITIES
(CONSERVATION of HABITATS) REGULATIONS 2001 (As Amended).**

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1.0	11/03/2026	Document created for SNCB review
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Project Details	
Application reference	Conductor driving operations at Hoton platform
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Applications Being Applied for	DR/2638/0



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Description of the Activity

Perenco UK Ltd proposes to install a single 36" conductor at the Hoton platform to support the future drilling of two new wells. These wells are scheduled for drilling through the installed conductor in late 2026 or early 2027. This Habitats Regulations Assessment (HRA) considers only the conductor installation; the drilling operations will be subject to a separate future assessment.

The conductor will be driven into the seabed to a depth of 43 metres using a Claxton S150 Hydrohammer. The primary installation method involves using hammer energy alone, thereby minimising the need for chemical use or discharge. If the conductor reaches refusal (i.e., ceases to penetrate the seabed), a contingency drill-out procedure will be initiated. This procedure involves deploying a drill inside the conductor to mechanically remove formation material and enable further penetration. During drill-out, returns will be circulated to surface via the inside of the conductor using treated seawater and high-viscosity sweeps to ensure effective hole cleaning and cuttings transport. This contingency approach will therefore result in limited chemical and fluid discharge.

The conductor installation will be undertaken from the HAEVA Jack-Up Barge (JUB), which will jack up alongside the Hoton platform. The JUB is supported by four legs terminating in spud cans, each of which penetrates the seabed with a footprint area of 86.59 m².

Location

The proposed works are located at the Hoton Normally Unattended Installation (NUI) in the Hoton field, Southern North Sea (SNS), within UKCS Block 48/7. The site lies approximately 78 km from the UK coastline and 111 km from the UK–Netherlands Median Line, in water depths of around 32 metres.

Timing

Conductor driving operations are planned to occur between 9 March 2026 and 30 June 2026. The operation itself is expected to take one day, although weather conditions may affect the schedule.

The activity is within or within close proximity to the following sites:

[Southern North Sea SAC – Designated for Harbour porpoise](#)

Conservation Objectives:

1. Harbour porpoise is a viable component of the site;
2. There is no significant disturbance of the species; and
3. The condition of supporting habitats and processes, and the availability of prey is maintained



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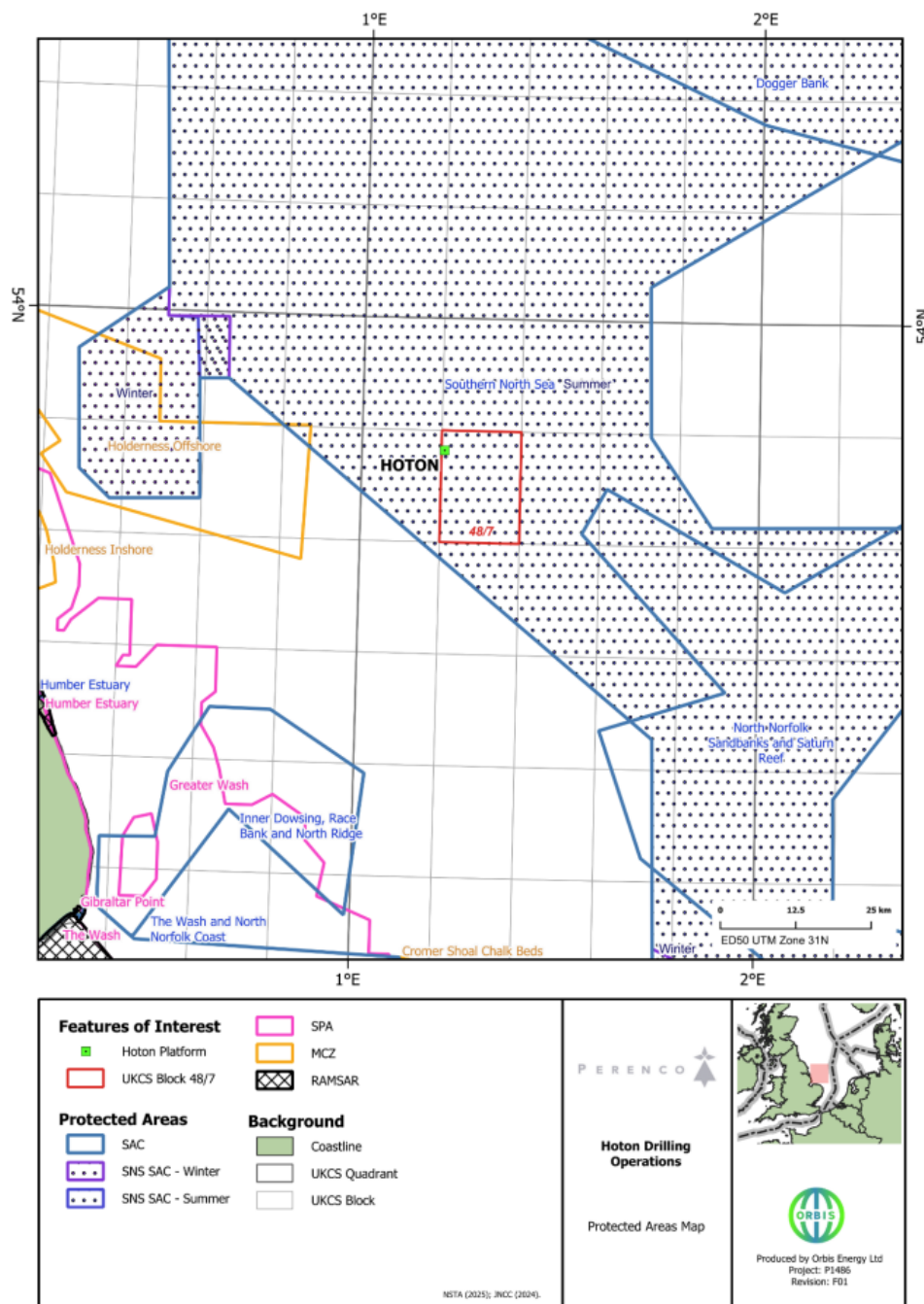


Figure 1: Location of the Hoton Platform

Requirement for a Habitats Regulations Assessment

Regulation 5 of the Offshore Petroleum Activities (Conservation of Habitats) Regulations 2001 (As amended) outlines that the Secretary of State (SoS), before agreeing to the grant of consent of any activity which is likely to have a significant on a relevant site, make an appropriate assessment of the implications for the site in view of its conservation objectives. This document is the record of the SoS appropriate assessment.



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Where the term 'Site' is used within this document, it means any site forming the UK National Site Network. The National Site Network is the UK network of protected sites on land and sea which were designated under the Habitats and Wild Birds directives namely Special Protection Areas (SPA) or Special Areas of Conservation (SAC).

The assessment will first determine what sites and protected features are likely to have conservation objectives which could be significantly affected by the activity and will then proceed to undertake an appropriate assessment of the implication of these effects on the site's integrity.

Stage 1: Test of likely Significant effects (LSE)

Is the activity likely to have a significant effect on the site's conservation objectives?

Pressures associated with the activity

The project is considered to exert the following pressures on the environment:

Pressure 1: Underwater noise (impulsive noise)

Significant levels of impulsive underwater noise will be emitted from the piling of the conductor into the seabed. The operations are expected to take place in accordance with the parameters in Table 1.

Table 1. Conductor driving parameters

Parameter	Values
Number of conductors piles	1
Maximum conductor pile diameter	914mm/36"
Maximum hammer energy (kJ)	150
Conductor pile material	Carbon Steel
Conductor pile length	43 m
Conductor driving duration	10 hours

Pressure 2: Underwater noise (non-impulsive noise)

Underwater noise from non-impulsive sources such as vessel engines and will be generated during the proposed conductor driving operations.

Note: At this time there is no indication that non-impulsive operational noise could have a significant impact on the SNS SAC



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Pressure 3: Seabed disturbance

Conductor driving will result in a disturbance of the seabed when it is placed on location. The positioning of the Haeva Jack Up Barge (JUB) will require the placement of the 4 legs and associated spud cans on the seabed. To aid the positioning of the JUB the 4 anchors will be deployed and the associated anchor chain will make contact with the seabed. The spud cans cans, anchors and anchor chain/wire will cause, compression, abrasion and disturbance of the upper layers of seabed sediment.

The total area of seabed disturbance is 11921m, a break down is quantified in table 2 below

Table 2: Seabed disturbance as outlined in the EAJ

Seabed Disturbance Activity		Estimated Area of Seabed Disturbed (m ²)
Working Position Spudcan Placements x 4		346.4 m ² N1
Standoff Spudcan Placements x4		346.4 m ² N1
Anchors x 4		36 m ²
Anchor Chain Laydown (assuming 50% chain length in contact with the seabed and a lateral movement of 2 m)		2,196 m ² N2
Anchor Wire Laydown and Drag	Starboard Bow Anchor Wire	2,447.26 m ² N2
	Starboard Aft Anchor Wire	3,327.96 m ² N2
	Port Aft Anchor Wire	2,589.94 m ² N2
	Port Bow Anchor Wire	2,802.17 m ² N2
Placement of New Conductor Pipe		25 m ² N3
Total		~~2,603.40 m²~~ 11,921.13 m ²

Pressure 4: Degradation of water or sediment quality:

The activity will involve the discharge of fluids into the sea, some of which may contain chemicals or hydrocarbons that could be toxic or persistent, potentially affecting water or sediment quality. All chemical use will be strictly regulated under the offshore chemical permitting regime, and any hydrocarbon discharge will be controlled through an oil discharge permit.



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LSE Assessment

Site features and conservation objectives are taken from relevant SNCB conservation advice packages found on the following webpages:

- <https://jncc.gov.uk/our-work/southern-north-sea-mpa/>



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Table 2. Test of likely significant Effect

Feature		Is there likely to be a significant effect on the conservation Objectives ALONE	
Pressure	Feature	Conservation Objective	Conclusion
Southern North Sea SAC			
Underwater Noise (Impulsive) Underwater Noise (Non-Impulsive) Seabed Disturbance	Harbour porpoise (Phocoena Phocoena)	1. Maintain - Harbour porpoise a viable component of the site;	No Likely Significant Effect: There is no likely mechanism by which seabed disturbance or non-impulsive noise associated with the project could affect the harbour porpoise population within the site. Noise modelling indicates that sound levels generated during conductor installation could result in the onset of Permanent Threshold Shift (PTS) in harbour porpoise at distances up to 660 metres from the source. Such injury would constitute an offence under the Habitats Regulations. Accordingly, the project will implement mitigation measures to ensure that harbour porpoise are not present within the potential injury zone during piling operations. These mitigation measures will primarily rely on Marine Mammal Observers (MMOs) undertaking a pre-piling visual watch using equipment proven effective at detecting marine mammals at ranges of approximately 1 kilometre. The project will adhere to 2010 Statutory nature conservation agency protocol for minimising the risk of injury to marine mammals from piling noise



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Feature		Is there likely to be a significant effect on the conservation Objectives ALONE	
Pressure	Feature	Conservation Objective	Conclusion
<i>Underwater Noise (Impulsive)</i> <i>Underwater Noise (Non-Impulsive)</i> <i>Seabed Disturbance</i>	<i>Harbour porpoise (Phocoena Phocoena)</i>	2. There is no significant disturbance of the species	No Likely Significant Effect: The SNCB guidance on noise management in harbour porpoise SACs states a plan/project, individually or in combination, is significant if it excludes harbour porpoises from more than: • 20% of the relevant area of the site in any given day, or • an average of 10% of the relevant area of the site over a season The SNCB guidance also assigns standardised disturbance distances for harbour porpoise because of different activities. These are termed effective deterrent ranges (EDRs) and it is assumed that within this EDR harbour porpoise will be disturbed to an extent where they flee the area, effectively displacing porpoise from regions of the SAC. Conductor piling requires the application of a 5 km EDR, which extends to the whole area around the piling vessel. Using this EDR as a radius around the piling vessel the developer has calculated the area of sea within which harbour porpoise may experience disturbance within a 24-hour period as 78.54 km². The percentage of the summer area of the SNS SAC that may be excluded because of the proposed operations is 0.29% per day. The contribution to the seasonal average disturbance is 001% This area of disturbance alone represents a very small proportion of the seasonal area, well below the 20% threshold beyond which adverse effects are possible. Thus, the project alone is unlikely to represent a source disturbance significant enough to significantly affect the conservation objectives.



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Feature		Is there likely to be a significant effect on the conservation Objectives ALONE	
Pressure	Feature	Conservation Objective	Conclusion
<i>Underwater Noise (Impulsive)</i> <i>Underwater Noise (Non-Impulsive)</i> <i>Seabed Disturbance,</i> <i>Degradation of water or sediment quality:</i>	<i>Harbour porpoise (Phocoena Phocoena)</i>	3.Maintain - The condition of supporting habitats and processes, and the availability of prey is maintained	No Likely Significant Effect: The audible disturbance created by the project will be 11921m² highly localised and short lived e.g 10 hours approximately and whilst there will be some effect on fish distribution in the surrounding area, the scale of this change is unlikely to disrupt prey availability at a sufficient spatial or temporal scale that could affect the condition of the harbour porpoise population There will be some abrasion and disturbance of the shallow upper layers of sediment on the seabed covering 11921m², this will be concentrated to the footprint of the Jack up barge (JUB) covering 0.000032262% of the SAC. The pressure will cease once the JUB leaves location allowing recovery to commence, the benthic and demersal communities are typical of the southern north sea with survey data showing predominant taxa in the benthic assemblage were polychaetes (<i>Nephtys cirrosa</i>, <i>Spiophanes bombyx</i>, <i>Magelona mirabilis</i>), bivalves (<i>Tellina fabula</i>), brittlestars (<i>Amphiura</i> spp. (juv)) and malacostracan amphipods (<i>Bathyporeia</i> sp. This type of assemblage is expected to show good recovery to physical disturbance, particularly where this disturbance is shallow and does not significantly change the sediment composition/type. This will allow for the habitat and prey of harbour porpoise to rapidly recover. The application has assessed the impacts of noise on fish and determined that whilst there will be some behavioural response in fish in addition to some localised injury risk, the scale of this effect is too small and over too short a time period to have any significant effect on prey availability in the SAC. <i>Water Quality</i>



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Feature		Is there likely to be a significant effect on the conservation Objectives ALONE	
Pressure	Feature	Conservation Objective	Conclusion
			All chemical and hydrocarbon discharges will comply fully with the Offshore Chemical Regulations and the Offshore Petroleum Activities (Oil Pollution and Control) Regulations 2005. This includes strict adherence to the conditions set out in the project's chemical permit and oil discharge permit issued by OPRED. Hydrocarbon discharges will be limited to the quantities and concentrations specified in these permits. All chemicals used will be assessed and registered through the Offshore Chemicals Notification System (OCNS). The chemical permit details the quantities of each chemical, and all discharges are subject to a rigorous chemical risk assessment process, reviewed by specialist assessors at CEFAS. Risk Quotients (RQ values) for all chemical discharges are low, indicating no significant toxic effects that could compromise the conservation objectives of the SAC.



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LSE Conclusion: Alone

Site	Feature	Conservation Objective	LSE?
Southern North Sea SAC	Harbour porpoise (<i>Phocoena phocoena</i>)	CO1, CO2, CO3	N

When considered alone the project is **unlikely to cause a significant effect on the conservation objectives of any site.**

Southern North Sea SAC:

The following projects have been evaluated to ascertain if they **could** exert a pressure on the SNS SAC's designated feature ("Harbour porpoise (*Phocoena phocoena*)"), which when considered in-combination with those of the proposed operations could result in a significant effect on the site's conservation objectives (Table 2). These projects, in combination, exceed the disturbance thresholds published in the Guidance for assessing the significance of noise disturbance against Conservation Objectives of harbour porpoise SACs of 20% for daily and 10% for seasonal underwater noise. Therefore, there is potential for likely significant effects in the SNS SAC.

Table 2. Likelihood of plans acting in-combination to cause a likely significant effect for the SNS SAC. Blue highlighted entry denotes the proposed operations.

Project	Significant In-combination effect likely?	What pressures may act in-combination? * See Table 3 for references
East Anglia Three – Monopiling (Abated)	Yes	1
Perenco – Conductor Piling	Yes	1
Hornsea Three – Monopiling (Abated)	Yes	1
NEP Expansion – Geophysical Survey (Sub-Bottom Profiling)	Yes	1
NEP Expansion – Seismic Survey	Yes	1
NEP Expansion – Vertical Seismic Profiling	Yes	1
NEP Phase 1 – UXO Clearance (HO)	Yes	1
NEP Phase 1 – Vertical Seismic Profiling	Yes	1
Norfolk Vanguard West – UXO Clearance (LO)	Yes	1
Eastern Greenlink 2 – UXO Clearance (HO)	Yes	1
NEP Phase 1 – UXO Clearance (LO)	Yes	1
Hornsea Three – UXO Clearance (LO)	Yes	1
Ithaca (Cygnus) – Conductor Pile Driving of the 44/12a Slot 1 Well	Yes	1



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Table 3. Pressure reference – Key of pressures use in in-combination assessment

Pressure	Ref
Underwater noise (impulsive: conductor driving-based)	1
Underwater noise (non-impulsive: vessel-based)	2
Seabed disturbance	3



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Table 4: Test of likely significant effect – In Combination

Could any other activity act In – combination with the project to significantly affect the conservation objective?		
Feature	Conservation Objective	Conclusion
Southern North Sea SAC		
<i>Harbour porpoise (Phocoena Phocoena)</i>	1.Maintain - Harbour porpoise a viable component of the site; .	No. A review of activities and projects occurring in the SNS SAC have indicated that there will not be any projects which represent a significant risk to supporting habitats, prey availability or harbour porpoise condition. Therefore, the minor effects of the project are unlikely to significantly affect the conservation objectives of the site even when considered in-combination with other projects ongoing in the SAC
<i>Harbour porpoise (Phocoena Phocoena)</i>	2.There is no significant disturbance of the species	Yes. A significant number of activities are expected to occur in the SNS SAC during 2025 which will emit impulsive noise into the SNS SAC summer area.
<i>Harbour porpoise (Phocoena Phocoena)</i>	3.Maintain - The condition of supporting habitats and processes, and the availability of prey is maintained	No. A review of activities and projects occurring in the SNS SAC have indicated that there will not be any projects which represent a significant risk to supporting habitats, prey availability or harbour porpoise condition. Therefore, the minor effects of the drilling project are unlikely to significantly effect the conservation objectives of the site even when considered in-combination with other projects ongoing in the SAC



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Conclusion: LSE In-combination

It cannot be concluded that the activity is unlikely to cause a significant effect in-combination with other plans or projects on the conservation objectives of the following site:

Site	Feature
Southern North Sea SAC	Harbour porpoise (<i>Phocoena phocoena</i>)

Stage 2: Appropriate Assessment

Could the activity adversely affect the integrity of a site?

Following the LSE assessment (Stage 1) the SoS must undertake an AA to determine whether the proposed activities, when considered in combination with other plans and projects, could have an adverse effect on:

Site: Southern North Sea SAC

Features: Harbour porpoise (*Phocoena phocoena*)

Pressures to assessed: Underwater noise (impulsive: conductor driving-based)

To ensure that the integrity of the SNS SAC is maintained and that it makes the best possible contribution to maintaining Favourable Conservation Status (FCS) for Harbour Porpoise in UK waters, in the context of natural change, this will be achieved by ensuring that:

1. Harbour porpoise is a viable component of the site;
2. There is no significant disturbance of the species; and
3. The condition of supporting habitats and processes, and the availability of prey is maintained.

The ‘*integrity of the site*’ is not defined in the Conservation Objectives. However, EU and UK Government guidance defines the integrity of a site as “*the coherence of the site’s ecological structure and function, across its whole area, or the habitats, complex of habitats and/or populations of species for which the site is or will be classified*’ (EC 2000, Defra 2012). Therefore, the integrity of the site applies to the whole of the site and it is the potential impacts across the whole of the site that are required to be appropriately assessed. Pressures that would affect site integrity include:

- killing or injuring harbour porpoise (directly or indirectly);
- preventing their use of significant parts of the site (disturbance/displacement);
- significantly damaging relevant habitats; or
- significantly reducing the availability of prey.



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The JNCC and Natural England advice is that ‘noise disturbance within the site should not exclude harbour porpoise from more than 20% of the site on any given day. Over a season, the advice is that an average loss of access to more than 10% of the SAC should be considered significant, recognising that within the SAC the abundance of harbour porpoise per unit habitat is generally higher than the equivalent sized habitat in the rest of the relevant Management Unit. Management of temporary habitat ‘loss’ to below defined area/time thresholds is therefore designed to ensure that it continues to contribute in the best possible way to the maintenance of the species at FCS.’ (JNCC, 2020).

Conclusion: Appropriate Assessment - **Alone**

At the LSE assessment stage it was concluded that no significant impact on the designated features of any site will occur when considering the project alone

In-combination Assessment: Harbour porpoise (*Phocoena phocoena*)

A further assessment has been undertaken to understand whether the impacts from other plans or projects could act in-combination with those of the proposed operations and cause an adverse effect on the site integrity.

Scope of Appropriate Assessment:

Site: Southern North Sea SAC

Features: Harbour porpoise (*Phocoena phocoena*)

Pressures: Underwater noise (impulsive: geophysical survey based)

Conservation Objective 1: Harbour porpoise is a viable component of the site.

Given that the project has a very short duration (approximately one day) and that the distance within which the onset of Permanent Threshold Shift (PTS) may occur is limited to 660 metres, the risk of killing or injuring harbour porpoise, either directly or indirectly, is very low. The applicant has appropriate and proportionate control measures in place to prevent injury. Therefore, the likelihood of the activity having any significant effect on the viability of the harbour porpoise population, either alone or in-combination, is negligible, and this Conservation Objective is not considered further in the Appropriate Assessment.

Conservation Objective 2: There is no significant disturbance of the species.

Daily Disturbance

Several other projects are expected to generate impulsive noise within the summer portion of the SAC during the same season, as listed in Table 5. Table 5 also presents the corresponding potential disturbance areas based on each activity's Effective Deterrent Range (EDR).

If all activities planned for the summer period were to occur on the same day, the cumulative disturbance footprint and therefore the area from which harbour porpoise could be displaced would exceed the 20% daily threshold. This exceedance could indicate a potential adverse effect on the Conservation Objectives if no mitigation or coordinated planning were in place.



Mitigation Measures: Daily Disturbance

In practice, not all listed operations will occur on the same day. When activities are instead distributed throughout the summer period, there is sufficient capacity for all operations to proceed while remaining below the 20% daily disturbance threshold.

All operators listed in Table 5 will be subject to licence conditions requiring coordination with one another to ensure that the cumulative disturbance footprint on any given day does not exceed 20% of the summer area. This coordination will be undertaken through the SIMOPs working group within the Developers' Coordination Forum (DCF).

Cumulative daily disturbance will be recorded and monitored via the shared "noisy activities spreadsheet", accessible to regulators and industry partners through the DCF Teams channel.

Seasonal Disturbance

The conductor-driving operation will take place on a single day, with the earliest start being 9 March 2026 and the latest completion date being 30 June 2026. As such, the activity falls entirely within the summer period of the SAC.

There is some uncertainty regarding the precise seasonal average disturbance contribution because licence assessments often assume the longest possible operational duration, whereas actual activities typically conclude within shorter timeframes. Nevertheless, even under worst-case scenarios presented in Table 6, the estimated seasonal disturbance contribution is expected to remain below 3%, well within the 10% seasonal threshold.

To provide additional assurance, the seasonal cumulative disturbance figure will be calculated and monitored through the ongoing cross-sector SIMOPs process, ensuring that operations remain within the recommended thresholds.

Current daily contributions (not necessarily occurring on the same day within the SNS SAC) are as follows:

Table 4. Worst case daily disturbance scenario. Blue highlighted entry denotes the proposed operations.

Activity	Daily Disturbance Percentage (%)
East Anglia Three – Monopiling (Abated)	7.55
Perenco – Conductor Piling	0.29
Hornsea Three – Monopiling (Abated)	0.56
NEP Expansion – Geophysical Survey (Sub-Bottom Profiling)	2.40
NEP Expansion – Seismic Survey	2.96
NEP Expansion – Vertical Seismic Profiling	2.96



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Activity	Daily Disturbance Percentage (%)
NEP Phase 1 – UXO Clearance (HO)	7.21
NEP Phase 1 – Vertical Seismic Profiling	1.66
Norfolk Vanguard West – UXO Clearance (LO)	3.47
Eastern Greenlink 2 – UXO Clearance (HO)	0.01
NEP Phase 1 – UXO Clearance (LO)	0.37
Hornsea Three – UXO Clearance (LO)	0.29
Ithaca (Cygnus) – Conductor Pile Driving of the 44/12a Slot 1 Well	0.29
Perenco - Leman South West Shallow well Explosive	2.62

Summary

To prevent breaching the 20% threshold, the daily contributions will be managed by the 2026 DCF SIMOPS meetings, such that the threshold will not be exceeded at any given day of the summer season. Perenco will have a condition on their screening directions such that this threshold is not exceeded. The seasonal average displacement is well below the 10% threshold

Conclusion: Appropriate Assessment - In-combination		
Pressure	Feature	Is an adverse effect possible
Underwater noise (impulsive: conductor driving-based)	Harbour porpoise (<i>Phocoena phocoena</i>)	No, provided the mitigation measures outlined are employed.

Conclusion of Habitats Regulations Assessment

An assessment has been undertaken to determine whether the conductor driving operations at Hoton could significantly impact the conservation objectives of any site within the UK National Site Network. The likelihood of a significant effect on the conservation objectives of the following site and features could not be ruled out:

Southern North Sea SAC – Harbour porpoise (*Phocoena phocoena*)

An appropriate assessment was undertaken to ascertain whether the project could adversely affect the site's integrity considering its conservation objectives:



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Conservation Objectives:

1. Harbour porpoise is a viable component of the site;
2. There is no significant disturbance of the species; and
3. The condition of supporting habitats and processes, and the availability of prey is maintained.

The appropriate assessment has determined that the project will have some effect on the SAC. However, it has been concluded that any effects will not be significant provided the appropriate mitigation measures are taken. These will be conditions in the screening directions to be issued to Perenco.

The Secretary of State, therefore, concludes that the proposed project will not adversely affect the integrity of the SAC, either alone or in-combination with other plans and projects.



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Annex

Application documents

DR/2638/0

Statutory Nature Conservation Body (SNCB) Consultation

JNCC Response received 18/03/2026 – No concerns and agree with conclusions

References

JNCC (2010). Statutory nature conservation agency protocol for minimising the risk of injury to marine mammals from piling noise.

JNCC (2020). Guidance for assessing the significance of noise disturbance against Conservation Objectives of harbour porpoise SACs.

JNCC (2025). Updated Effective Deterrent Ranges (EDRs) for assessing the significance of noise disturbance against Conservation Objectives of harbour porpoise Special Areas of Conservation (England, Wales & Northern Ireland)