

Date: 10 January 2020
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BY EMAIL ONLY

Dear Sir/Madam

Application for Non-Material Changes for Dogger Bank Teesside A Offshore Wind Farm

The Planning Inspectorate has consulted online on 27 November 2019 regarding the application by Doggerbank Offshore Wind Farm Project 3 Projco Limited to make a Non-Material Change (NMC) to the Dogger Bank Teesside A and B offshore wind farm order 2019.

The following constitutes Natural England's formal response.

Marine and coastal ornithology

Natural England agrees with the conclusions in the Environmental Report and Appendix I, namely that:

- For disturbance and displacement, barrier effects and habitat loss and change, the worst case scenario assessed in the Environmental Statement (ES) would remain unchanged by the proposed amendments.
- For gannet, kittiwake, lesser black backed gull and great black-backed gull, the collision risk modelling results demonstrate that the use of fewer, larger turbines whilst retaining the same air gap results in a reduction of collision risk for all four species examined based on Option 2 of the Band CRM model.

Flamborough & Filey Coast Special Protection Area (SPA)

For disturbance and displacement, barrier effects and habitat loss and change, Natural England advises that the worst-case scenario set out in the original ES as regards impacts on SPA guillemot and razorbill is unaffected by the NMC.

For collision mortality, it has been demonstrated by the applicant that no new, materially different, significant effects arise for SPA gannet and kittiwake, and that the worst case scenario in the original ES is unchanged.

Therefore, we advise that the NMC will not lead to an adverse effect on site integrity on the Flamborough & Filey Coast SPA when considered in-combination with other plans or projects.

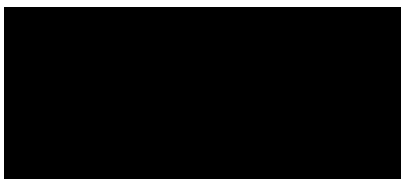
Use of Teesside A worst case scenarios for collision risk in EIA and HRA assessments

We note in the Applicant's covering letter that '*Whilst the NMC application would permit fewer, larger turbines, Teesside A would retain the ability to deliver up to 200 turbines with a 167m rotor diameter as assessed and currently consented under the DCO.*' Accordingly Natural England advises that the worst case scenarios for collision risk from the original Teesside A ES should continue to be used in the cumulative and in-combination assessments for proposed windfarms,

including those currently under examination, rather than the figures presented in the non-material change application.

If you have any queries or require further information, do not hesitate to contact me at martin.kerby@naturalengland.org.uk or on 0208-225-6829.

Yours sincerely



Martin Kerby
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cc. Emma Brown, Natural England; Sophy Allen, Natural England