

**Summary Written Representation  
for the  
Royal Society for the Protection of Birds**

**15 July 2015**

**Planning Act 2008 (as amended)**

**In the matter of:**

**Application by SMartWind for an Order granting Development Consent for the**

**Hornsea Offshore Wind Farm – Project Two**

**located 89km east of the East Riding of Yorkshire Coast**

**Planning Inspectorate Ref: EN010053  
Registration Identification Ref: 10031166**



## **1. Introduction**

The primary concerns of the RSPB are due to the wind farm footprint and surrounding area lying within the foraging range of the Flamborough Head and Bempton Cliffs Special Protection Area (the SPA) and the Flamborough and Filey Coast potential SPA (the pSPA) and their designation species. These include northern gannets, in respect of which the area is the only breeding colony in England, black legged kittiwakes particularly in light of its reduction from the 83,370 breeding pairs in 1993 to an average of 44,520 breeding pairs between 2008 and 2011, common guillemot, razorbill and Atlantic puffin.

## **2. Offshore Ornithology Concerns**

The RSPB is concerned about the robustness of the assessment of the offshore impacts of the proposed scheme. Due to deficiencies and uncertainties in the methodological information provided by the applicant, the RSPB considers that it cannot be concluded with certainty that the application, alone or in combination with other plans/projects will not have an adverse effect on the integrity of the SPA and pSPA and their species.

### ***Collision risk modelling***

A key concern is associated with the way in which the applicant has identified the proportion of birds at Potential Collision Height with the turbines, which differs considerably from the methods normally used to identify it. The manner in which the data was collected during survey, and subsequently manipulated for analysis, exacerbates potential errors in collision risk modelling exercises. For most key species the proportion of flights estimated to be at collision height is substantially lower than would be expected. This gives rise to concern that the risk of collision is consequently substantially underestimated in the outputs from the models.

In addition, the extended Band model has been used by the applicants in the absence of suitable data and an inappropriately elevated correction factor is then applied to the final outputs of the models, contrary to the recent avoidance rate review by the British Trust for Ornithology (BTO) and the Statutory Nature Conservation Bodies' (SNCB) guidance. Compounding this, no account is given in the applicant's assessment for uncertainty and variability in the model outputs, which is contrary to the guidance associated with the model, and the subsequent SNCB guidance.

Together these issues undermine confidence that the impacts have been properly evaluated. As a consequence the RSPB does not consider that the collision risk modelling undertaken for Hornsea Project Two is reliable or appropriate.

### ***Displacement***

The RSPB is also concerned about the potential displacement impacts of Hornsea Project Two. The population estimates derived from survey data appear unrealistic and cannot be relied upon for assessment, and uncertainty as to the extent of mortality from displacement has been inadequately expressed in the values that have been used within the model.

Due to these concerns it is impossible to assess whether there will be impacts upon the SPA and pSPA due to displacement.

### ***Assessment of population level effects***

The RSPB supports Natural England's advice that Population Viability Analysis (PVA) should be used to investigate population level impacts on the SPAs and their species of predicted additional mortality arising from the construction and operation of Hornsea Project Two.

The RSPB welcomes the inclusion of PVA in the applicant's HRA, but due to our concerns set out above we are unable to comment on this in detail as the workings underlying the calculations have not been included within the ornithological information submitted with the application.

And we note that the applicant has continued to partially rely on Potential Biological Removal to assess the impacts of the scheme.

We consider that further analysis is required, including the use of more up to date demographic rates, the modelling of displacement and collision mortality together, the correct apportioning of birds to the SPAs, and the use of the Counterfactual of Population Size as an output metric.

The RSPB is concerned due to the problems identified that the information currently provided in the HRA will not enable the Examining Authority to carry out a comprehensive in-combination assessment.

### **3. Alternative Solutions**

Due to the potential impacts upon the SPA and pSPA the RSPB considers that the Examining Authority will need to consider whether there are other alternative solutions available that would meet the need Hornsea Project Two is being promoted to meet.

This process should identify the needs for (or benefits of) the plan or project and decide which are genuine public needs, identify all potential and feasible alternative solutions to meet the public need, assess the impacts of these alternative solutions on Natura 2000 sites and their species/habitats and finally decide whether there are less damaging alternative solutions to Hornsea Project Two.

The RSPB considers that the appropriate reference point for this exercise is the Government's stated energy target of approximately 33 GW of new renewable energy capacity by 2025, set out in National Policy Statement EN-1, *Overarching National Policy Statement for Energy*. This is intended to meet targets set out in the European Union's Renewable Energy Directive 2009.

A significant amount of new renewable energy generation capacity has come on stream since EN-1 was published, which goes half way to meeting the 2025 target. There is a significant capacity of onshore schemes that are in the pipeline (having received necessary

consents and funding). Coupling this with known consented offshore renewable energy schemes that are under construction, have received funding and are preparing to start construction, other consented (but not yet funded) schemes and those either awaiting determination or expected to apply within the next 12 months, indicates that there are a significant number of schemes that could contribute to meeting EN-1's target.

The RSPB considers, based on publicly available information, that sufficient schemes are coming forward, or could be funded, to enable the Government to meet its 2025 target of 33 GW of renewable energy without needing to consent Hornsea Project Two. If the Examining Authority and Secretary of State agrees with the RSPB's concerns over the appropriate assessment of the scheme it would not be possible for the scheme to be consented.

#### **4. Onshore Ornithology Concerns**

The RSPB is also concerned about some of the potential impacts arising from the works in the intertidal area associated with the cable-laying process. The cable landfall is in the vicinity of the only substantial high tide wader roost in this part of the Humber Estuary. The uncertainty about the length of time over which cable operations of both Hornsea Project One and the present project will take place give the RSPB cause for concern that disturbance over the same time period in a number of sequential years may cause abandonment of the roosts and the associated feeding areas. Clarification of the timetable for cable laying may help to address our concerns on this issue.