

Date: 23 June 2016
Our ref: 186857
Your ref: EN010053



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BY EMAIL ONLY

Dear Giles

Planning Act 2008 and The Infrastructure Planning (Examination Procedure) Rules 2010 (as amended) – Application by SMart Wind Limited for an Order Granting Development Consent for the Hornsea Offshore Wind Farm (Zone 4) – Project Two.

Request for comments on the application for the proposed Hornsea Project Two Offshore Windfarm – EN010053

Thank you for your consultation dated 26 May 2016. The following constitutes Natural England's formal statutory response.

Fulmar Displacement Mortality

Natural England understands that the Secretary of State is seeking clarification on the Applicant's Habitat Regulation Assessment (HRA) report and in particular Natural England's conclusions, as referenced within the Applicant's HRA report, on the impact of fulmar displacement at the Forth Islands SPA, the Fowlsheugh SPA and Flamborough and Filey Coast pSPA.

Representation of Natural England's position with the Applicant's HRA Report

As stated in our Relevant Representations (paragraph 5.1.3.1), Natural England does not agree with the Applicant's representation of our position throughout the application documents that they initially submitted to the Planning Inspectorate (including the Applicant's HRA Report, dated January 2015). In several cases the Applicant has included "*Natural England's position*" sections in the HRA report which are an interpretation by the Applicant of Natural England's position, and not a statement provided by ourselves. The text included in the "*Natural England's position*" sections for fulmar displacement at Flamborough and Filey Coast pSPA, Fowlsheugh SPA and the Forth Islands SPA does not represent Natural England's assessment or conclusions in relation to fulmar displacement at these three SPAs.

Flamborough and Filey Coast pSPA (FFC pSPA)

Natural England considers that potential displacement impacts on fulmar from the Project alone and in combination with other plans and projects are unlikely to be significant, and would therefore not adversely affect the integrity of the breeding bird assemblage at FFC pSPA, of which fulmar is a named component. This is because the species has an extensive foraging range and low sensitivity to displacement. Fulmar have one of the largest foraging ranges of any seabird regularly found in UK waters (mean max foraging range 400km (Thaxter et al. 2012)). In addition, fulmar have been assessed as having low sensitivity to disturbance coupled with low habitat specialisation (i.e. they are generalists), so that displacement from Project areas and associated mortality is predicted to be very low (Furness et al 2013, Bradbury et al 2014).

Fowlsheugh SPA and the Forth Islands SPA

Scottish Natural Heritage (SNH) are responsible for providing conservation advice for Natura sites protected in Scotland and therefore these two SPAs fall outside Natural England's remit.

For any queries relating to the content of this letter please contact me using the details provided below.

Yours sincerely,

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References

Bradbury G, Trinder M, Furness B, Banks AN, Caldow RWG, et al. (2014) Mapping Seabird Sensitivity to Offshore Wind Farms. PLoS ONE 9(9): e106366. doi:10.1371/journal.pone.0106366

Furness R, Wade H, Masden E (2013) Assessing vulnerability of marine bird populations to offshore wind farms. Journal of Environmental Management 119: 56–66.

Thaxter, C. B., Lascelles, B., Sugar, K., Cook, A. S. C. P., Roos, S., Bolton, M., Langston, R. H. W. & Burton, N. H. K. 2012. Seabird foraging ranges as a preliminary tool for identifying candidate Marine Protected Areas. Biological Conservation, 156: 53-61.