

April 2019

By email only

Dear Sir/Madam

Re: East Anglia THREE Non-material Change Application

Thank you for consulting us regarding the non-material change application for East Anglia THREE. As you will be aware, the RSPB were an Interested Party to the examination of this project. During the examination, the RSPB and Scottish Power Renewables (SPR) discussed the potential to provide partial mitigation for collision risk impacts through increasing the draught height of the turbines, thus reducing the number of birds flying at a height at which they could potentially collide. The RSPB welcomed SPR's commitment to raise the minimum draught height of the turbines such that no more than 52 of the turbines would have a draught height of less than 24m. This was secured in requirements 2 (1) e and (2) of the Development Consent Order. The reason given for the need for some turbines to retain a lower draught height was that higher turbines in some parts of the site would interfere with military radar at Trimingham, Norfolk.

Our comments on the non-material change application relates to the proportions of turbines at draught heights of 22m and 24m. Table 2.1 in the Supporting Statement states that the minimum clearance of the turbines above sea level must not exceed 22m. Given that a number of the turbines will have a draught height of at least 24m (as discussed above), our view is that this should state that the minimum clearance *should not be less* than 22m (with no more than 52 turbines having a draught height of less than 24m). A similar statement has been made in the 'Methods' section of the 'Collision risk modelling for alternative turbines' report, which states that the calculations are based on a 'minimum of 52 turbines at the lower height'. Again, we consider that this should be a maximum of 52 turbines at the lower height.

As stated in the collision risk modelling report, the original consent made provision for 30% of the turbines to be at the lower height and 70% at the upper height. Given the reduced collision risk arising from turbines with a draught height of 24m, compared to those with a draught height of 22m (as can be inferred from Table 5 in the collision risk modelling note), we query why it has not been possible to retain similar proportions of turbines with a draught height of 24m in the new design. Whilst we acknowledge that the new design using the alternative turbines does not result in an increased collision risk, we consider it may have been possible to reduce collision risk further by retaining the 70:30 split of turbines with 24m/22m draught heights. We also query how, when the upper tip height has been increased by 66m for the new turbine models, the issue of interference with military radar has been resolved. If this issue has been resolved, we would welcome exploration of the possibility of raising the lower tip and hub height in order to reduce potential seabird mortality.

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The RSPB is part of BirdLife International,
a partnership of conservation organisations
working to give nature a home around the world.

Please do not hesitate to contact me should you require any clarification or further information.

Yours faithfully



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