



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE)
RULES

2010

East Anglia TWO Offshore Wind Farm

Appendix A16 to the Natural England Deadline 5 Submission

**Natural England's comments on Offshore Ornithology Cumulative and
In-Combination Collision Risk Update [REP4-042]**

For:

The construction and operation of East Anglia TWO Offshore Wind Farm, a 900MW wind farm which could consist of up to 75 turbines, generators and associated infrastructure, located 37km from Lowestoft and 32km from Southwold.

Planning Inspectorate Reference: EN010078

3rd February 2021



Natural England comments on Offshore Ornithology Cumulative and In-Combination Collision Risk Update [REP4-042]

This document is applicable to both the East Anglia ONE North and East Anglia TWO applications, and therefore is endorsed with the yellow and blue icon used to identify materially identical documentation in accordance with the Examining Authority's (ExA) procedural decisions on document management of 23rd December 2019. Whilst for completeness of the record this document has been submitted to both Examinations, if it is read for one project submission there is no need to read it again for the other project.

1. Summary

1. Overall, the updates presented do not alter Natural England's conclusions presented in our update on Offshore Ornithology submitted at Deadline 3 [REP3-117].

2. Collision modelling update (East Anglia One North alone)

2. Natural England notes that the predicted collision figures for East Anglia One North alone have been recalculated on the basis of the introduction of a 2km buffer between East Anglia One North and the Outer Thames Estuary SPA. As Natural England stated in our Deadline 4 response [REP4-087], we do not consider that a 2km buffer provides adequate mitigation. Therefore, we would anticipate further updates will be necessary.

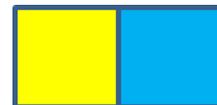
3. Updated cumulative and in-combination collisions

3. Kittiwake: We acknowledge that Hornsea Project Three has now been granted consent. We note that the Applicants have assumed that the compensation provided by Hornsea Project Three, for kittiwakes from the Flamborough and Filey Coast (FFC) SPA, fully compensates for the predicted collisions from this project, and hence zero kittiwake collisions are attributed to the FFC SPA from Hornsea Project Three. Natural England are still considering the implications of the Hornsea Project Three decision and hence our advice in relation to cumulative and in-combination figures when this project is included in the totals. However, it should be noted that the Hornsea Project Three decision does not change Natural England's conclusions in relation to in-combination collision effects of FFC SPA



kittiwakes for EA1N and EA2. We have advised that an adverse effect on integrity (AEol) could not be ruled out for in-combination collision risk to kittiwakes at the FFC SPA since Hornsea Project Two. Therefore, any additional mortality arising from further proposals would be considered adverse. Since Hornsea Project Two, further projects have been consented or waiting to be determined. Each project since Hornsea Two, including EA1N and EA2, makes a contribution to an in-combination total where AEol cannot be ruled out. Therefore, even assuming the kittiwake mortality for Hornsea Project Three will be fully compensated, it does not change the fact that in-combination impacts with other projects remain.

4. Hornsea Project 3 All species: We note for Hornsea Project 3 recognise that presently the numbers included for EIA cumulative for all species and for HRA in-combination, for all species except FFC SPA kittiwakes, do not take into account the mitigation and additional baseline data provided in Ørsted's post-examination submissions for Hornsea Project Three. Therefore, once these are available anticipate that all open applications will need to update their collision risk and displacement figures for the cumulative/in-combination assessment.
5. Headroom: We welcome that the figures included in REP4-042 (for EA3 and EA1) have reverted to those for the consented projects rather than the figures for the Non-Material Changes. We note that the figures now included for these two projects in REP4-042 reflect those submitted at the end of the Norfolk Boreas Examination for all species. With the exception of those for great black-backed gull for EA3, the annual total included in REP4-042 for EA3 is 34.4 GBBG collisions. However, the annual total included for the same project in the Norfolk Boreas cumulative assessment was 39 collisions. We recommend the Applicants double check these figures.
6. Hornsea Project 4: We welcome that figures from Hornsea Project Four are provided in the cumulative/in-combination assessments. However, we note that the figures included for this project are from the PEIR for the project and these represent the best available figures in the public domain for this project. These PEIR figures, and the methodologies to produce them, are subject to ongoing discussions through the evidence plan process and therefore have an element of uncertainty associated with them and a likelihood of being subject to change.



Therefore, we welcome that the Applicants have presented cumulative and in-combination totals for both including and excluding Hornsea Project Four. This inevitable uncertainty around the Hornsea Project Four figures means that Natural England is not in a position to advise that a significant adverse impact for cumulative impacts at EIA scale or that an AEoI for in-combination impacts at HRA can be ruled out for any relevant species or feature of an SPA when Hornsea Project Four is included in the totals.